DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

Alpine Community Plan Update
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LIST OF ABBREVIATIONS AND ACRONYMS

Acronym/ Term	Definition
°F	degrees Fahrenheit
µg/m^3	Micrograms per cubic meter
AB	Assembly Bill
ABM	Activity Base Model
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
Alpine CPU	Alpine Community Plan Update
AMSL	Above Mean Sea Level
APCD	San Diego Air Pollution Control District
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AST	Above Ground Storage Tank
ATP	San Diego County Active Transportation Plan
AUSD	Alpine Union School District
BMP	Best Management Practice
Board	Board of Supervisors
BOS	Board of Supervisors
BTU	British Thermal Unit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standard
CAJPA	California Association of Joint Powers Authorities
CalEEMod	California Emissions Estimator Model
Cal NAGPRA	California Native American Graves Protection and Repatriation Act
Caltrans	California Department of Transportation
CalGreen	Green Building Standards Code
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCA	Community Choice Aggregation
CCR	California Code of Regulations
CEC	California Education Code
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	California Fire Code
CGS	California Geologic Survey
CHHSL	California Human Health Screening Level
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CNF	Cleveland National Forest
CO	Carbon Monoxide

Acronym/ Term	Definition
Code	Code of Regulatory Ordinances
County	County of San Diego
CPA	Community Plan Area
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CSA	County Service Area
CWA	Clean Water Act
dB	Decibels
dBA	A-weighted Decibels
DCV	Design Capture Volume
diesel PM	Diesel Particulate Matter
DMA	Drainage Management Area
DTSC	Department of Toxic Substances Control
EDU	Equivalent Dwelling Unit
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning community Right-to-Know Act
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FCI	Forest Conservation Initiative
FHSZ	Fire Hazard Severity Zones
FPD	Fire Protection District
FMMP	Farmland Mapping and Monitoring Program
FPP	Fire Protection Plan
FRA	Federal Railroad Administration
FRA	Federal Responsibility Area
FSC	Fire Safe Council
FTA	Federal Transit Administration
FUD	Formerly Used Defense Site
GC	Government Code
GHG	Greenhouse Gas
GIS	Geographic Information System
GP	General Plan
GPA	General Plan Amendment
GUHSD	Grossmont Union High School District
HAPs	hazardous air pollutants
HCP	Habitat Conservation Plan
HPRD	high-performance renewable diesel
HRA	health risk assessment
HSC	Health & Safety Code
HU	Hydrologic Unit

Acronym/ Term	Definition
I-8	Interstate 8
IFC	International Fire Code
JEPA	Joint Exercise of Power Agreement
JPA	Joint Power Authority
JRMP	Jurisdictional Runoff Management Plan
LAFCO	Local Agency Formation Commission
LBP	Lead Based Paint
LDC	Land Development Code
LEA	Local Enforcement Agency
L_{EQ}	Equivalent Energy Level
LID	Low Impact Development
LMP	Cleveland National Forest Land Management Plan
LOS	Level of Service
LPC	Light Pollution Code
LPPA	Local Park Planning Area
LRA	Local Responsibility Area
LTPP	Long Term Procurement Plan
LUFT	Leaking Underground Fuel Tank
MCL	Maximum Contaminant Levels
ME	Mobility Element
MEP	Maximum Extent Practicable
MICR	maximum incremental cancer risk
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MS4	Regional Municipal Separate Storm Sewer System Permit
MSCP	Multiple Species Conservation Plan
MSR	Municipal Service Review
MTBE	Methyl Tertiary Butyl Ether
MTS	Metropolitan Transportation System
MWD	Municipal Water District
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Repatriation Act
NAHC	Native American Heritage Commission
NCTD	North County Transit District
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act
NO	Nitric oxide
NO_x	Nitrogen dioxide
NO_2	Oxides of nitrogen
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	Noise Sensitive Land Uses
OWTS	Onsite Wastewater Treatment Systems

Acronym/ Term	Definition
PAMA	Pre-Approved Mitigation Area
P-C	Production Consumption
PDP	Priority Development Projects
PDS	Planning & Development Services
PLDO	Park Lands Dedication Ordinance
Plug-in SD	Plug In San Diego
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Respirable Particulate Matter
PMP	Parks Master Plan
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PRG	Preliminary Remediation Goals
PUD	Public Utilities Department
RAQS	regional air quality strategy
RCA	Resource Conservation Area
RCRA	Resource Conservation and Recovery Act
RES	Regional Energy Strategy
RMS	Root Mean Square
RPA	Forest and Rangeland Renewable Resources Planning Area
RPO	Resource Protection Ordinance
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCMSCP	South County Plan of the Multiple Species Conservation Plan
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCL	San Diego County Library
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SDRWQCB	San Diego Regional Water Quality Control Board
SDSD	San Diego County Sheriff's Department
SEIR	Supplemental Environmental Impact Report
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SO_2	Sulfur Dioxide
SOI	Sphere of Influence
SR	State Route

Acronym/ Term	Definition
SRA	State Responsibility Area
SWIS	Solid Waste Inventory System
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Stormwater Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
T-BACT	Toxic Best Available Control Technology
TDA	Transportation Development Act
TDM	Transportation Demand Management
TDR	Transfer of Development Rights
TDS	Total Dissolved Solids
TIF	Transportation Impact Fee
TSG	Transportation Study Guide
USFS	United States Forest Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VCMU	Village Core Mixed Use
VIEJAS	Viejas Band of Kumeyaay Indians
VMT	Vehicle Miles Travelled
VOC	Volatile Organic Compound
WMA	Watershed Management Areas
WPO	Watershed Protection Ordinance
WRCC	Western Regional Climate Center
WSCP	Water Shortage Contingency Plan
WUI	Wildland Urban Interface

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SUMMARY

This chapter provides a summary of the Draft Supplemental Environmental Impact Report (Draft SEIR) prepared for the Alpine Community Plan Update (Alpine CPU), prepared in compliance with the California Environmental Quality Act (CEQA). The County of San Diego (County) is the Lead Agency for the SEIR, as defined by CEQA. This means the County has the primary responsibility for evaluating the environmental effects of the Alpine CPU and considering whether to approve the Alpine CPU.

This Draft SEIR analyzes and discloses the environmental impacts of the proposed project, which is the Alpine CPU. The Alpine CPU is a component of the General Plan. The proposed project refines the General Plan specifically to the Alpine Community Plan Area (CPA) by developing community-specific policies, updating the mobility network, and determining new land use designations. Subsequent actions that would be forthcoming as a result of the proposed project is a Rezone, Design Guidelines, Transfer of Development Rights , and Implementation Plan. As described further below, there are six alternatives with different land use designations and associated changes to the mobility network; however, the policies remain the same for the Alpine CPU.

This Draft SEIR tiers from the General Plan EIR (2011) and the Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (2016) (referred to throughout the rest of this section as "prior EIRs") for all topic areas except air quality, greenhouse gas (GHG), wildfire, and transportation and traffic, and evaluates the changes from the Alpine CPU in comparison to what was analyzed in the prior EIRs. For topic areas of air quality, GHG, wildfire, and transportation and traffic, see topic area for baseline and tiering off of prior EIRs. This SEIR is programmatic in nature in that it analyzes the reasonably foreseeable impacts of the changes to the existing Alpine Community Plan. It should be noted that the Alpine CPU itself does not propose any specific development project that would result in physical impacts on the environment. However, it is reasonably foreseeable that subsequent projects implemented after adoption of the Alpine CPU could result in physical impacts on the environment.

As a result of community input and staff analysis, six alternatives with different land use designations were developed for seven subareas within the Alpine CPA. These seven subareas are the only areas within Alpine that would experience a change in land use designations. The proposed project analyzed in this SEIR is the Village-Focused Alternative that proposes services and residential density close to existing or planned infrastructure. The Village-Focused Alternative was selected to be analyzed because it increases density in more highly developed areas in Alpine near existing infrastructure and commercial/retail options to reduce the number and length of car trips. The proposed project would increase the allowable residential development capacity in the Alpine CPA from 4,065 dwelling units (allowed by the current General Plan) to 6,078 dwelling units. It should be noted however, that six additional land use alternatives with varying densities are fully analyzed within Chapter 5 Alternatives, of this SEIR. The results of the alternatives analysis are summarized within this section (see Section S.3 below) and a brief description of each alternative is provided below.

The No Project Alternative, analyzes what would happen if the Alpine CPU were not to be adopted. Alternatives 1 through 3 propose less density than is currently proposed by the project and allowed by the current General Plan while Alternatives 4 and 5 propose more density. Table 4-2 in Chapter 4 of this document, summarizes the buildout assumptions for these alternatives compared to the proposed project and current General Plan.

S.1 Overview

S.1.1 Project Location

The proposed project is located in Alpine, an unincorporated community in the eastern portion of San Diego County, approximately 25 miles east of downtown San Diego. The Alpine CPA covers approximately 68,100 acres of land characterized by diverse geography, residential land use patterns, and an established town center. Distinguishable geographic features include the rugged peaks of the Viejas and El Cajon Mountains near El Capitan Reservoir in the northern portion of the community, as well as the hills and valleys around Loveland Reservoir in the southern portion.

The Alpine CPA is bisected by Interstate 8 (I-8). Most of the land in the eastern and northern portions are within the Cleveland National Forest (CNF). The Alpine CPA is bordered by the Central Mountain CPA to the north and east, the Jamul-Dulzura CPA to the south, and the Lakeside and Crest-Dehesa-Harbison Canyon-Granite Hills CPAs to the west. The Viejas Indian Reservation and Capitan Grande Reservation are also within the boundaries of the Alpine CPA; however, they are not under the County's jurisdiction. The project location is further discussed in Section 1.2 of this document.

S.1.2 Project Objectives

The County has identified the following objectives for the proposed project:

1. Provide community-specific policies and establish development guidance in pursuit of the County's GHG reduction targets.
2. Ensure new development is planned and designed in a manner that protects Alpine's natural setting and unique community character.
3. Require new development and encourage existing development to minimize impacts to public safety and provide adequate defensibility from wildfires.
4. Promote sustainability by focusing growth where services and infrastructure exist or can be reasonably built.
5. Encourage compact, mixed use development to support a vital Village core and advance the County's goals to reduce Vehicle Miles Travelled (VMTs).
6. Minimize the impacts from development on sensitive natural resources—such as Alpine Creek, Viejas Mountain, and CNF for the benefit of the community.
7. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
8. Reinforce the vitality, local economy, and character of Alpine while balancing housing, employment, and recreational opportunities.

S.1.3 Project Description

S.1.3.1 Proposed Land Use Designation Changes

The proposed project analyzed in this SEIR consists of the Village Focused Alternative. The proposed land uses would re-designate the land use designations within four of the seven subareas of the Alpine CPA.

Under the proposed project, no land use changes are proposed outside of the seven subareas. The proposed land use designations concentrate residential development adjacent to transit routes, community services, retail options and employment opportunities in order to reduce the total VMT for residents of Alpine. To accomplish this goal, land use designation changes would concentrate higher density uses closer to the Village, allow mixed use in the Village Core, and provide neighborhood commercial opportunities near established residential communities and freeway access.

The proposed land use changes would result in an increase in intensity, density and the number of potential dwelling units that could be developed within the CPA. The proposed land use changes would result in changes in density and the number of potential dwelling units that could be developed at buildout of the Community Plan, as further discussed in Section S.1.3.2, *Residential Yields Analysis*.

S.1.3.2 Residential Yields Analysis

To determine the number of dwelling units that could be expected to be developed under the proposed project, a residential yields analysis was completed. First, parcels that would experience land use changes were entered into a database along with their Assessor Parcel Numbers, General Plan designations, and proposed Alpine CPU designations. The parcels were then grouped into polygons based on their land use designations and processed through a geographic information system (GIS) based application that constrained potential yield based on the presence of built lands, rural lands, floodplains, wetlands, public lands, future roads, habitat preserve, Alquist-Priolo fault zones, airport noise, airport hazard zones, steep slope, habitat tier 1 and 2, and Pre-approved Mitigation Areas (PAMA). To be conservative, the County Groundwater Ordinance was removed as a constraint, which allowed for the maximum expected yield to be calculated under the assumption that water could be provided to the subareas either by extending the County Water Authority/Padre Dam Municipal Water District boundary or through potential financing options detailed in the Implementation Plan.

Under the current General Plan, 4,065 potential dwelling units could be developed within the seven subareas, while 6,078 potential dwelling units could be developed under the proposed project. Outside of the seven subareas, the maximum residential development potential is 2,365 for both the General Plan and the Alpine CPU. Therefore, the maximum residential development potential in the Alpine CPA is 6,430 dwelling units under the current General Plan and 8,443 dwelling units with the proposed project.

S.1.3.3 Community Plan Elements

The proposed project would update and refine the adopted Alpine Community Plan's goals and policies to reflect the character of Alpine and guide growth and development in the Alpine CPA. These updates are consistent with the goals, policies, and planning concepts of the General Plan and all other applicable County plans and programs. The proposed Alpine CPU consists of six elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety, and Noise.

Land Use

The Land Use Element provides the community's land use framework including the General Plan's regional categories related to the Community Plan's land use designations, existing land uses, infrastructure, and public services. This element provides goals and policies to provide a balance of land uses, promoting economic opportunities and scenic travel routes, and preservation of agricultural resources.

Mobility

The Mobility Element provides the community's mobility network including roads, transit, bike paths, and trails. Existing and planned roads are provided through a map and matrix, which is an appendix to the Community Plan. Goals and policies are provided to support multi-modal transportation systems.

The proposed project includes several proposed changes to the Mobility Element including roadway re-classifications, roadway re-configurations, as well as the removal and addition of roadway segments.

Conservation and Open Space

The Conservation and Open Space Element discusses open space and recreational resources that make Alpine unique and how these resources will be protected and maintained for their local and regional benefits. The goals and policies provided promote a balance of natural and man-made open space resources, as well promoting a balance between connectivity for the community and wildlife.

Housing

The Housing Element discusses the current housing supply in Alpine, the importance of creating "missing middle" housing, housing affordability, senior housing and housing programs and services. The goals and policies of the Housing Element are geared towards promoting a variety of housing types in all economic ranges; encouraging community involvement and keeping the rural character.

Safety

The Safety Element discusses natural and human-made hazards such as fire hazards, steep slopes, and flooding as well as the fire services and law enforcement resources in the Alpine community. The goals and policies of the Safety Element promote the establishment of emergency procedures and preventative measures to minimize hazards; and encourage improvements to the built environment to promote community safety.

Noise

The Noise Element explains how noise is measured and the generators of noise related to both transportation and non-transportation. The goal and policy of the Noise Element promote the minimization of noise in residential neighborhoods.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

This Draft SEIR examines the potential environmental effects of the proposed project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. The potential environmental effects of the proposed project were analyzed for the following areas.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- GHG Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

This SEIR evaluates the proposed project and five additional land use alternatives, as well as the No Project Alternative. The proposed project and alternatives represent a range of land uses and potential development intensities with similar types of environmental effects but with differing degrees of impact. Detailed evaluations of the differences between the proposed project and the alternatives are included in Chapter 4.0, *Alternatives*, of the SEIR.

Table S-1, presented at the end of this chapter, provides a summary of the environmental impacts that could result from implementation of the Alpine Community Plan Update and feasible mitigation measures that could reduce or avoid environmental impacts. For each impact, Table S-1 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures. Alpine CPU mitigation measures, beginning with "MM," are also listed in Chapter 6 of this SEIR. Prior EIR mitigation measures are included in Appendix B of this SEIR.

S.3 Project Alternatives

S.3.1 Summary of Alternatives

S.3.1.1 No Project Alternative

The No Project Alternative is provided to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative for the Alpine CPU would be the continuation of the current General Plan (adopted in 2011, amended in 2016) land use designations and zoning guiding development in the unincorporated areas of the County, including the seven subareas of the Alpine CPA, through the forecasted buildout year of 2050.

No expansion of the village boundary would occur under this alternative. Similar to the proposed project, the highest-density residential land use designations under this alternative would include high-density Village Core Mixed Use (C-5), which would allow up to 30 dwelling units per acre. However, only two areas with this designation—an area centered around the intersection of Alpine Boulevard and Arnold Way and an area east of the Viejas Casino and Resort, which are outside of the subarea boundaries. VR-10.9 and VR-15 designations, which would allow up to 10.9 or 15 dwelling units per acre, respectively, would also be allowed in a few pockets, primarily centered around Alpine Boulevard and Interstate (I) 8. All other land use designations within the seven subareas would include the lower- to moderate-density VR designations (VR-2 through VR-7.3) or Semi-Rural designations. The No Project Alternative would result in 4,065 allowable dwelling units in the seven subareas (2,013 fewer than the proposed project), and a

total forecasted population for the CPA of 35,918 and approximately 5,617 residents fewer than the proposed project[1].

S.3.1.2 Alternative 1: Former FCI Lands in Alpine

The Former FCI Lands in Alpine Alternative (Alternative 1) would reduce capacity in the CPA by reverting all former FCI lands in the Alpine CPA to RL-40 (one residential dwelling unit per 40 gross acres). The alternative applies to Subareas 3, 5, 6, and 7, which consists of areas south of I-8 roughly between the Alpine Boulevard/I-8 intersection and the East Willows Road/I-8 intersection and a number of parcels north of I-8 and in the southern areas of the Alpine CPA, including areas near Japatul Road, Japatul Valley Road, and Lyons Valley Road (see Figure 4-1). This is the only alternative that proposes a change in Subarea 7, which is currently designated for low-density RL-20 or SR-4 residential uses, and others are designated as Public Agency Lands or Tribal lands. This alternative was developed as a response to the FCI settlement and to evaluate the potential outcome of lowering density for former FCI lands. This alternative would result in a reduction of seven dwelling units in Subarea 3; 385 dwelling units in Subarea 5; and 2,703 dwelling units in Subarea 7 compared to the current General Plan. There are no changes in the dwelling units in Subarea 6 compared to the current General Plan. This alternative would result in fewer dwelling units in Subareas 2 through 7 when compared to the proposed project, and the same number of units in Subarea 1.

One new roadway is proposed in Subarea 5 (New Road 26), which is a minor collector road from Alpine Boulevard to Via Dieguenos via Viejas Creek Trail (see Figures 4-2a and 2b). The new road would provide a secondary access to Palo Verde Estates, which currently only has one way in and one way out. No other new or expanded Mobility Element roads would be constructed under this alternative as the proposed density does not necessitate any additional new or expanded roadways. In addition, this alternative would not amend the village boundary.

As shown in Table 4-3, this alternative would result in approximately 970 future allowable dwelling units in the seven subareas, which is 3,095 fewer units than the current General Plan and 5,108 fewer units than the proposed project. This alternative has a total forecasted population for the CPA of approximately 27,283 residents, which is 8,635 fewer residents than the current General Plan and 14,252 fewer residents than the proposed project.

S.3.1.3 Alternative 2: Former FCI Lands In Eastern Alpine

The Former FCI Lands in Eastern Alpine Alternative (Alternative 2) would reduce capacity in the CPA by reverting areas within former FCI study areas in Subarea 5 to their former land use designation of RL-40 (one dwelling unit per 40 gross acres). This alternative would involve land use designation changes in the area south of I-8 roughly between the Alpine Boulevard/I-8 intersection and the East Willows Road/I-8 intersection (see Figure 4-3). Like Alternative 1, this alternative was developed as a response to the FCI settlement.

This alternative would change some areas in Subarea 5 from their current General Plan designations of Rural Commercial (C-4), Village Residential 2 (VR-2), and Semi-Rural 4 (SR-4) to Rural Lands 40 (RL-40). Under this alternative, 75 dwelling units could be constructed within these areas instead of the 460 units allowed by the current General Plan. No land use changes to any other subareas would be proposed with this alternative when compared to the current General Plan. This alternative would result in fewer

[1] Population increase based on SANDAG's forecasted persons per household rate (2.79). Increase in dwelling units multiplied by average persons per household.

dwelling units in Subareas 1 through 6 when compared to the proposed project, and the same number of units in Subarea 7.

One new roadway is proposed in Subarea 5 (New Road 26), which is a minor collector road running from Alpine Boulevard to Via Dieguenos via Viejas Creek Trail (see Figures 4-4a and 4b). The new road would provide a secondary access to Palo Verde Estates, which currently only has one way in and one way out. No other new or expanded Mobility Element roads would be constructed under this alternative as the proposed density does not necessitate any additional new or expanded roadways. In addition, this alternative would not amend the village boundary.

As shown in Table 4-3, this alternative would result in approximately 3,680 allowable dwelling units in the seven subareas, which is 385 fewer units than the current General Plan and 2,398 fewer units than the proposed project. This alternative has a total forecasted population for the CPA of approximately 34,844, which is 1,074 fewer residents than the current General Plan and 6,691 fewer residents than the proposed project.

S.3.1.4 Alternative 3: Low Alternative

The Low Alternative (Alternative 3) would re-designate residential land uses in Subarea 5 only (see Figure 4-5) to create a gradual increase in residential density near Alpine Boulevard while maintaining a residential buffer for the CNF. Under the current General Plan, 460 dwelling units could be built in Subarea 5 while the alternative reduces capacity to a proposed 429 dwelling units. Under Alternative 3, several parcels within Subarea 5 would be re-designated from an existing SR-4 designation, which allows for up to one dwelling unit per 4, 8, or 16 acres depending on slope, to the lower-density RL-20 or RL-40 designation, which allows for one dwelling unit per 20 acres. In addition, an area within the northeastern portion of this subarea, abutting the I-8 corridor, would be re-designated from SR-4 to SR-1 and General Commercial uses. This alternative was proposed as an option for eastern Alpine during the FCI environmental review process. This alternative would result in fewer dwelling units in Subareas 1 through 6 when compared to the proposed project, and the same number of units in Subarea 7.

One new roadway is proposed in Subarea 5 (New Road 26), which is a minor collector road from Alpine Boulevard to Via Dieguenos via Viejas Creek Trail (see Figures 4-6a and 6b). The new road would provide a secondary access to Palo Verde Estates, which currently only has one way in and one way out. No other new or expanded Mobility Element roads would be constructed under this alternative because the proposed density does not necessitate any additional new or expanded roadways. In addition, this alternative would not amend the village boundary.

This alternative would result in approximately 4,034 allowable dwelling units in the seven subareas, which is 31 units fewer than the current General Plan and 2,044 fewer units than the proposed project. This alternative has a total forecasted population for the CPA of approximately 35,832 residents, which is 86 fewer residents than the current General Plan and 5,703 fewer residents than the proposed project.

S.3.1.5 Alternative 4: Moderate Alternative

The Moderate Alternative (Alternative 4) would re-designate land uses in Subareas 1 through 5. Subareas 6 and 7 would retain the land use designations assigned in the current General Plan. The Moderate Alternative proposes an increase in density around areas where services, amenities, underutilized land, and freeway access already exist and where planned Mobility Element roads will be developed primarily by Otto Avenue, Tavern Road, and Chocolate Summit. This alternative only proposes residential land use designations and does not include any commercial land use designations. In addition, this alternative

would extend the village boundary to the east in portions of Subarea 5 as a result of the proposed village land uses. This alternative would result in fewer dwelling units in Subareas 4 and 6 and a greater number of dwelling units in Subareas 1 through 3 and 5 when compared to the proposed project, and the same number of units in Subarea 7.

Land use designation changes would occur as follows (see Figure 4-7) as compared to the current General Plan:

- Subarea 1: A portion of this subarea currently designated Limited Impact Industrial (I-1) would be re-designated to VR-7.3 to match existing VR-7.3 land uses to the east.
- Subarea 2: Land use designations in this subarea would change from existing designations of VR-2, VR-2.9, VR-4.3, and SR-1 to VR-7.3 and VR-10.9. In addition, a new light collector roadway (New Road 25) is proposed to abut Wright's Field to the north (see Figures 4-8a and 8b).
- Subarea 3: Land use designation changes in this area would increase density slightly from SR-1 to SR-0.5. However, the easternmost portion of this subarea with severe slope constraints would change from SR-1 to the lower-density SR-2.
- Subarea 4: The northern and eastern portions of this subarea would be re-designated to SR-1 from SR-2.
- Subarea 5: Several land use changes would occur in this subarea. Some parcels adjacent to the I-8 corridor would change from VR-2 and SR-4 designations to VR-4.3 and SR-1. Parcels farther south would be re-designated from SR-4 and RL-40 to SR-1, SR-2, and RL-20. A small area in the northeastern area of this subarea would be re-designated General Commercial and SR-0.5 from SR-4. While a transfer request has not been submitted nor is it the County's intent to submit a request, the alternative includes evaluating the possibility of a land transfer with the CNF. Three new roadways are proposed in this subarea, New Roads 26, 27, and 29. New Road 26 is a minor collector road from Alpine Boulevard to Via Dieguenos via Viejas Creek and would provide a secondary access to Palo Verde Estates. New Roads 27 and 29 are minor collector roads. New Road 27 runs from Alpine Boulevard to cul-de-sac #2 and New Road 29 runs from Alpine Boulevard to New Road 28 (see Figures 4-8a and 8b). These two new roads would accommodate increased capacity resulting from higher density in the subarea.

This alternative would result in approximately 5,691 allowable dwelling units in the seven subareas, which would result in 1,626 more units than the current General Plan and 387 fewer units than the proposed project. This alternative has a total forecasted population for the CPA of approximately 40,455 residents, which is 4,537 more residents than the current General Plan and 1,080 fewer residents than the proposed project.

S.3.1.6 Alternative 5: High Alternative

The High Alternative (Alternative 5) would re-designate land uses in Subareas 1 through 6. The High Alternative proposes land use changes that could connect parks, schools, and open space to high-density residential in the Tavern Road community and increase opportunities for high-density residential and new commercial in the Village. In addition, this alternative would extend the village boundary to include Subarea 3 and portions of Subarea 5 as a result of the proposed village land uses. This alternative would result in fewer dwelling units in Subarea 4 and a greater number of dwelling units in Subareas 1 through 3 and 5 when compared to the proposed project, and the same number of units in Subareas 6 and 7.

Land use designation changes would occur as follows (see Figure 4-9) as compared to the current General Plan:

- Subarea 1: The subarea would be re-designated from VR-7.3 and I-1 to VR-15, similar to the land uses to the south.
- Subarea 2: Land use designations in this subarea would change from existing designations of VR-2, VR-2.9, VR-4.3, and SR-1 to VR-10.9, VR-20, and VR-24. In addition, a new light collector roadway (New Road 25) is proposed to abut Wright's Field to the north (see Figures 4-10a and 10b).
- Subarea 3: Existing SR-1 land uses would change to VR-7.3 and VR-10.9.
- Subarea 4: The subarea would change from SR-1, SR-2, and VR-2 to SR-0.5.
- Subarea 5: Several land use changes would occur in this subarea. Parcels adjacent to the I-8 corridor would be changed from VR-2 and SR-4 designations to VR-4.3, VR-7.3, VR-10.9, and VR-2.9. Parcels farther south would be re-designated from SR-4 and RL-40 to SR-1, SR-10, and RL-20. A small area in the northeastern area of this subarea would be re-designated General Commercial and VR-7.3. While a transfer request has not been submitted nor is it the County's intent to submit a request, the alternative would include evaluating the possibility of land exchanges with the CNF for Public Agency Lands located in the southwest portion of the subarea.
    - Eight new roadways are proposed in this subarea, New Roads 26 through 33. New Road 26 is a minor collector road from Alpine Boulevard to Via Dieguenos via Viejas Creek and would provide a secondary access to Palo Verde Estates. New Roads 27 through 33 are minor collector roads off of Alpine Boulevard in this subarea (see Figures 4-10a and 10b). These roads would accommodate increased capacity resulting from higher density in the subarea.
- Subarea 6: The subarea would be re-designated from VR-15, SR-1, C-1, C-4, and P/SP to C-5 to provide high-density residential options and flexibility in commercial options.

This alternative would result in approximately 11,498 allowable dwelling units in the seven subareas, which would result in 7,433 more units current General Plan and 5,420 more units than the proposed project. This alternative has a total forecasted population for the CPA of approximately 56,657 residents, which is 20,739 more residents than the current General Plan and 15,122 more residents than the proposed project.

S.3.2 Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. The alternative that would reduce the greatest number of impacts compared to the proposed project would be the Former FCI Lands Alternative (Alternative 1). The reduced impacts associated with Alternative 1 are the result of the significant reduction in allowable dwelling units compared to the proposed project; specifically, Alternative 1 would allow 5,108 fewer dwelling units than the proposed project throughout Subareas 1 through 7. Therefore, Alternative 1 is considered the environmentally superior alternative because it would reduce the greatest number of impacts. However, this alternative would not achieve most of the project objectives.

S.3.3 Areas of Controversy and Issues to be Resolved by the Decision Making Body

S.3.3.1 Areas of Controversy Known to the Lead Agency

CEQA Guidelines Section 15123(b)(2) requires that an EIR identify areas of controversy, including issues raised by other agencies and the public. Areas of known controversy associated with the Alpine CPU that are relevant to the SEIR are listed below:

- Evacuation of people from remote development when wildland fires occur in CNF
- Increased wildfire risk from increased density and number of homes
- Secondary effects of wildfires on ecosystems, wildlife, waterways and water quality, air quality, geology and soils, and GHG
- Future incompatible development and utility/water supply needs
- Lowering of the groundwater table from the installation of household wells
- The need to bring water and sewage services to East Willows Road
- Effects of future development on downstream water supply sources such as Loveland Reservoir
- Discourage the use of septic systems and promote annexation to sanitation districts
- Preservation of cultural resources
- Impacts on the draft East County Multiple Species Conservation Program and PAMAs
- Impacts to wetlands and riparian habitat; listed and other sensitive plant and wildlife species, including nesting birds; effects of lighting, noise, human activity, exotic species, and drainage; wildlife corridor and movement areas; conflicts between human and wildlife interface; habitat degradation, loss, and fragmentation; effects on Critical Biological Areas of the CNF; and effects on ecosystem services such as filtration of runoff
- Visual impacts relate to increased development adjacent to Cleveland National Forest

S.3.3.2 Issues to be Resolved by the Decision Making Body

The County of San Diego Board Of Supervisors (BOS) serves as the decision-making body for the Alpine Community Plan Update. The following is a description of issues related to the Alpine Community Plan Update that must be resolved by the BOS prior to or at the time of project approval and SEIR certification. Prior to the BOS taking final action on these issues, Planning & Development Services and the Planning Commission will develop recommendations. In developing these recommendations and rendering a decision, the County will consider input provided by the public, other agencies, and the Alpine community planning group. Additionally, the decisions of the Planning Commission and BOS are made in public hearings at which public comment is invited.

- **Final Composition of the Alpine Community Plan Update Land Use Map.** The BOS must decide on the final composition of the Alpine Community Plan Update land use map, specifically addressing which land use designations will be assigned to specific properties. This SEIR evaluates the Village Focused alternative as the proposed project, along with five alternatives: Alternative 1 - Former FCI Lands in Alpine, Alternative 2 - Former FCI Land in Eastern Alpine, Alternative 3 – Low, Alternative 4 – Moderate, and Alternative 5 - High. In addition, the No Project

Alternative (General Plan) was analyzed. The proposed project and alternatives represent a range of development intensities with similar types of environmental effects but with differing degrees of impact. Detailed evaluations of the differences between the proposed project and the alternatives are included in Chapter 4.0 of this SEIR, *Project Alternatives*. It is possible that the BOS may approve a land use map that represents a combination of the alternatives where a designation on a particular property is the same as on one of the alternatives or within the range that is evaluated in the SEIR. Should the BOS decide to approve a designation that is beyond the range that is considered in this SEIR, additional analysis may be necessary prior to certification of the SEIR.

- **Alpine Community Plan Update Text, Roadway Network, and Other Components.** The BOS must decide on the final composition of the Alpine Community Plan elements, circulation maps, and other components of the project. During the course of the project, the County has compiled numerous comments and recommendations from community groups, agencies, and other stakeholders. Planning & Development Services has continually sought consensus but a variety of opposing opinions remain. The BOS will make a final ruling in these areas of differing opinion, which will be reflected in the text or maps of the Alpine Community Plan or in the documents of other components of the project. Specifically, items that will likely be considered include the wording of Alpine Community Plan narrative, goals, and policies; the circulation network and road classifications; the land use maps; content of the Alpine Community Plan Implementation Plan; and other related components. Any modification made by the BOS to these elements that are outside of the analysis contained in this SEIR will require additional analysis prior to approval and certification of the EIR.
- **Proposed Mitigation.** The BOS will evaluate the full array of mitigation measures described in this SEIR and determine whether they represent all feasible measures to substantially lessen the significant environmental effects identified in this SEIR. The BOS may decide to add, remove, or alter measures to improve effectiveness in lessening significant environmental effects. Additionally, the BOS may decide that certain measures are inappropriate or infeasible. The BOS would prepare and adopt detailed findings on the feasibility of mitigation measures to substantially lessen or avoid the significant effects on the environment.
- **Consideration of Project Alternatives.** The BOS will evaluate the alternatives as summarized in Section S.3 above. A full discussion of the alternatives analyzed is provided in Chapter 4 of this SEIR. For those alternatives that would substantially lessen the significant environmental effects identified in this SEIR, the BOS must either adopt the alternative or find it to be infeasible.
- **Benefits of the Project Compared to Environmental Effects.** This SEIR has identified adverse environmental effects that are unavoidable. The BOS must determine if the adverse environmental effects are considered acceptable with consideration of economic, legal, social, technological, and other relevant benefits of the Alpine CPU. In making this determination, it is relevant for the BOS to consider the existing General Plan in comparison to the proposed project. The BOS would prepare and adopt a statement of overriding considerations, as described in CEQA Section 15093 to reflect the balancing of competing public objectives, if the BOS decides to approve the proposed project or one of the alternatives which have the potential to cause one or more significant effects on the environment.
- **Project Approval.** The BOS must decide whether or how to approve or carry out the proposed land use changes to any or all of the Alpine CPU subareas.

Table S-1. Summary of Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
2.1 Aesthetics and Visual Resources				
Project Impacts				
Scenic Vistas	**Impact-AES-1: Have a Substantial Adverse Effect on a Scenic Vista**. The proposed project has the potential to create more severe impacts to scenic resources associated with increased building height and scale as compared to the prior EIRs. This would be considered a significant impact.	PS	**Aes-1.2:** Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and CEQA Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas. **Aes-1.4:** Revise the Design Review process to streamline the process, improve consistency in implementation, and update design criteria as necessary. Current components of that process include Special Area Designators, Design Review Guidelines, and the Site Plan review and approval process. **Aes-1.5:** Create a Conservation Subdivision Program that facilitates conservation-oriented project design. **Aes-1.6:** Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Aes-1.7: Develop and implement programs and regulations that preserve agricultural lands (such as the County's CEQA guidelines and the Farm Program). Most existing agricultural lands are key components of scenic vistas and community character and the preservation of these resources is critical to minimizing impacts to these resources. **Aes-1.8:** Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines. **Aes-1.9:** Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas.	
	Impact-C-AES-1: Result in a Cumulatively Considerable Contribution to Having a Substantial Adverse Effect on a Scenic Vista. The proposed project would cause a similar impact related to impacts to scenic resources with increased building height and scale compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR mitigation measures Aes-1.2, and Aes-1.4 through Aes-1.9, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Scenic Resources	No New or More Severe Impacts than Previously Identified in prior EIRs. The proposed project would not result in any new or more severe impacts on scenic resources and impacts are less than significant.	LS	Implement 2011 General Plan Update PEIR mitigation measures Aes-1.2, and Aes-1.4 through Aes-1.9, as described above.	LS
	No New or More Severe Cumulative Impacts than Previously Identified in prior EIRs	LS	Implement 2011 General Plan Update PEIR mitigation measures Aes-1.2, and Aes-1.4 through Aes-1.9, as described above.	LS
Visual Character or Quality	**Impact-AES-2: In Non-urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public View of the Site and Its Surrounding**. The land use designation changes occurring as part of the proposed project would allow for an increase in density of residential development within three subareas, and mobility network changes, the implementation of which would result in considerable alteration of the visual character and quality of the subareas as compared to the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 General Plan Update PEIR mitigation measures Aes-1.2, and Aes-1.4 through Aes-1.9, as described above. **Aes-3.1:** Improve upon the County road standards or other right of way design guidelines to provide standards related to road design, parking, landscaping, and elements of the public realm that to are critical to the character of a community. **Aes-3.2:** Implement existing and prepare new community right-of-way development standards, as appropriate, that supplement the County road standards in order to recognize the unique constraints and character of different communities.	SU
	Impact-C-AES-2: Result in a Cumulatively Considerable Contribution in Non-urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public View of the Site and Its Surrounding. The proposed project	PS	Implement 2011 General Plan Update PEIR mitigation measures Aes-1.2, and Aes-1.4 through Aes-1.9, Aes-3.1, and Aes-3.2, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	would cause a similar impact to dark skies as compared to prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable			
Light or Glare	**Impact-AES-3: Create a New Source of Substantial Light or Glare that would Adversely Affect Day or Nighttime Views in the Area**. Given the magnitude of the potential project development, impacts to dark skies would be more severe than those identified in the prior EIRs. This would be considered a significant impact.	PS	**Aes-4.1:** Coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. **Aes-4.2:** Maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines.	SU
	Impact-C-AES-3: Result in a Cumulatively Considerable Contribution by Creating a New Source of Substantial Light or Glare that would Adversely Affect Day or Nighttime Views in the Area. The proposed project would cause a similar impact to visual character and quality as compared to prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR mitigation measures Aes-4.1 and Aes-4.2, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
2.2 Agriculture and Forestry Resources				
Project Impacts				
Convert Agricultural Resources	**Impact-AG-1: Convert Agricultural Resources.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the direct conversion of agricultural resources compared to the prior EIRs. This would be considered a significant impact.	PS	**Agr-1.1:** Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations. **Agr-1.2:** Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA guidelines, Zoning Ordinance, and Subdivision Ordinance). **Agr-1.3:** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. **Agr-1.4:** Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Agr-1.5: Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments). **MM-AG-1:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, applicants shall be required to demonstrate that the project would not convert agricultural resources that meet the Prime and Statewide soil criteria, as defined by the FMMP, and as determined by the Agricultural Guidelines, to a non-agricultural use or appropriate project-specific mitigation shall be required. Applicants may be subject to subsequent project-level analysis pursuant to the County LARA model and/or submit an agricultural resource report to determine the importance, and mitigation (if required) of said agricultural resources. This shall occur on a project-by-project basis and would be required through conformance with the Guidelines for Determining Significance for Agricultural Resources.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact-C-AG-1: Result in Cumulative Conversion of Agricultural Resources. The proposed project would cause a more severe potentially significant impact related to the direct conversion of agricultural resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Agr-1.1, Agr-1.2, and Agr-1.5; and Bio-1.1, 1.3, and 1.6; and Alpine CPU Mitigation Measure MM-AG-1.	SU
Conflict with Agricultural Zoning or Williamson Act Contract	**Impact-AG-2: Conflict with Agricultural Zoning or a Williamson Act Contract.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to conflict with agricultural zoning or Williamson Act contract compared to the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 Alpine CPU Mitigation Measure MM-AG-1. **Agr-2.1:** Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an "A" designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands.	LS
	Impact-C-AG-2: Result in a Cumulative Conflict with Agricultural Zoning or a Williamson Act Contract. The proposed project would cause a more severe potentially significant impact related to the conflict with agricultural zoning or Williamson Act contract compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measure Agr-2.1 and Alpine CPU Mitigation Measure MM-AG-1.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Result in the Loss or Conversion of Forestry or Timberland Resources	**Impact-AG-4**: **Cause the Direct or Indirect Conversion of Forestry Resources.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the direct and indirect conversion of agricultural resources compared to the FCI EIR. This would be considered a significant impact.	PS	**Bio-1.1:** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval. **Bio-1.3:** Implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County MSCP Subarea Plan. **Bio-1.6:** Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. **MM AG-3:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, applicants shall be required to demonstrate that the project would not convert forestry resources as determined by CEQA, to a non-forestry use or appropriate project-specific mitigation shall be required. Applicants may be subject to subsequent	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			project-level analysis that may require an agricultural resources report to determine the resource importance, impacts and mitigation (if required). This shall occur on a project-by-project basis and would be required pursuant to CEQA.	
	Impact-C-AG-4: Result in a Cumulatively Considerable Contribution to the Direct or Indirect Conversion of Forestry Resources. The proposed project would cause a more severe potentially significant impact related to the direct and indirect conversion of forestry resources compared to the FCI EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measure Bio-1.1, Bio-1.3, and Bio-1.6 and Alpine CPU Mitigation Measure MM-AG-3.	SU
Cause Indirect Conversion of Agriculture or Forestry Resources	**Impact-AG-3: Cause an Indirect Conversion of Agricultural or Forestry Resources.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the indirect conversion of agricultural resources compared to the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Agr-1.1 through Agr-1.5. **MM AG-2:** As a part of the discretionary review of subsequent projects located within a one-mile radius of an existing agricultural operation, Williamson Act Contract or County Agricultural Preserve, shall be required to demonstrate that the project would not indirectly impact said resources or appropriate project-specific mitigation shall be required. Subsequent projects may be assessed pursuant to the County LARA model and/or prepare an agricultural resources report to determine impacts and mitigation (if required) to reduce indirect impacts to said resource. This shall occur on a project-by-project basis and would be required through conformance with the	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Guidelines for Determining Significance for Agricultural Resources.	
	Impact-C-AG-3: **Result in a Cumulative Indirect Impact on Agricultural or Forestry Resources.** The proposed project would cause a more severe potentially significant impact related to the indirect conversion of agricultural resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Agr-1.1 through Agr-1.5 and MM AG-2.	SU
2.3 Air Quality and Health Risk				
Project Impacts				
Conflict with Applicable Air Quality Plan	**Impact-AQ-1: Conflict with Air Quality Plans.** Due to increased development densities proposed in the Alpine CPA which are not consistent with the RAQS and SIP, the proposed project would cause a more severe potentially significant impact related to plan consistency compared to the prior EIR. This would be considered a significant impact.	PS	**Air-2.1:** Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles. **Air-2.2:** Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. **Air-2.3:** Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. **Air-2.4:** Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			cell technologies, renewable energy sources, and hydrogen fuel. **Air-2.5:** Require that the following measures be implemented on all construction projects where project emissions are above the SLTs: • Multiple applications of water during grading between dozer/scraper passes • Paving, chip sealing or chemical stabilization of internal roadways after completion of grading • Use of sweepers or water trucks to remove "track-out" at any point of public street access • Termination of grading if winds exceed 25 miles per hour • Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control • Use of low-sulfur fuels in construction equipment • Use of low-VOC paints • Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV. **Air-2.6:** Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality. **Air-2.7:** Implement County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction. **Air-2.8:** Require NSRs to prevent permitting projects that are "major sources." **Air-2.9:** Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures. **Air-2.10:** Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. **Air-2.11:** Implement County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O3. **Air-2.12:** Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			and Environmental Design (LEED) standards or other equivalent Green Building rating systems. **Air-2.13:** Revise Board Policy G-16 to require the County to: • Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and • Require government contractors to use low emission construction vehicles and equipment. **Air-4.1:** Use the policies set forth in the CARB's Land Use and Air Quality Handbook (CARB 2005) as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.	
	Impact-C-AQ-1: Result in a Cumulatively Considerable Conflict with Air Quality Plans. Result in a Cumulatively Considerable Conflict with Air Quality Plans. The proposed project would cause a more severe potentially significant cumulative impact related to air quality plan consistency compared to the prior EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Air-2.1** through **Air-2.13,** and **Air-4.1**as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Violate an Air Quality Standard	**Impact-AQ-2: Result in a Cumulatively Considerable Increase in Nonattainment Pollutant.** Due to the increase in construction and operation emissions from increased development proposed by the Alpine CPU the project would cause a potentially significant impact related to nonattainment criteria air pollutants. Due to the increased density proposed, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Air-2.1** through **Air-2.13,** and **Air-4.1**as described above. ***Construction Mitigation Measures*** **MM-AQ-1.** Require construction contractors to use high-performance renewable diesel (HPRD) fuel for diesel-powered construction equipment. Exemptions can be made for where HPRD is not commercially available within 200 miles of the Alpine CPA, or where the use of HPRD would not be economically feasible for use in project construction. The construction contract must document their unavailability or demonstrate economic burden to receive exemption from this requirement. Any HPRD product that is considered for use by the construction contractor shall comply with California's Low Carbon Fuel Standards. HPRD fuel must meet the following criteria: • Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., nonpetroleum sources), such as animal fats and vegetables, • contain no fatty acids or functionalized fatty acid esters, and • have a chemical structure that is identical to petroleum-based diesel which ensures HPRD will be compatible with all existing diesel engines; it must comply with American Society for Testing and Materials D975 requirements for diesel fuels. **MM-AQ-2.** Require construction contractors to minimize idling time either by shutting equipment off	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. **MM-AQ-3.** Require construction contractors to stagger the scheduling of construction activities to avoid the simultaneous operation of construction equipment to minimize criteria pollutant levels resulting from operation of several pieces of emissions-intensive equipment, to the extent feasible. **MM-AQ-4.** Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the Alpine CPA. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine. **MM-AQ-5.** Require construction contractors to maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			MM-AQ-6. Require construction contractors to implement and comply with the following fugitive dust control practices. • Reduce fugitive dust from disturbed soil areas by: watering exposed soil with adequate frequency for continued moist soil (without overwatering to the extent that sediment flows off the site); suspending excavation, grading, and/or demolition activity when wind speeds exceed 20 miles per hour; installing wind breaks (e.g., trees or solid fencing) on windward side(s) of construction areas; and planting vegetative ground cover (fast-germinating native grass seed) in disturbed areas. • Reduce fugitive dust from unpaved roads by: installing wheel washers for all existing trucks, or washing off all trucks and equipment leaving the site; treating site access to a distance of 100 feet from the paved road with a six- to 12-inch layer of wood chips, mulch, or gravel; and posting a publicly visible sign with the telephone number and a person to contact at the lead agency regarding dust complaints. **MM-AQ-7.** Require construction contractors to reduce construction-related fugitive VOC emissions by ensuring that low-VOC coatings that have a VOC content of 10 grams/liter (g/L) or less are used during construction. The construction contract must demonstrate of the use of low-VOC coatings and be submitted to SDAPCD prior to the start of construction.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Operation Mitigation Measures	
			MM-AQ-8. Prohibit the installation of wood burning stoves or fireplaces in discretionary residential developments. All stoves and fireplaces installed in proposed discretionary residential developments must be natural gas or electric.	
			MM-AQ-9. Require all new residential and commercial developments to include accessible outdoor outlets in the project design to facilitate the use of electricity-powered landscaping equipment.	
			MM-AQ-10. Require the provision of educational materials for residential and commercial tenants concerning green consumer products and electric powered landscaping equipment. Prior to receipt of any certificate of final occupancy, the project sponsors shall work with the County to develop electronic correspondence to be distributed by email to new residential and commercial tenants that encourages the purchase of consumer products that generate lower than typical VOC emissions. Examples of green products may include low-VOC architectural coatings, cleaning supplies, and consumer products, as well as alternatively fueled landscaping equipment. The correspondence will also discuss the air quality and public health benefits of using electric powered landscaping equipment over conventional gasoline-powered equipment.	
			MM-AQ-11. Encourage water heaters in new residential developments to be either solar, electrically powered, or tankless gas.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			MM-AQ-12. Require all non-residential projects to prepare a Transportation Demand Management (TDM) plan that focuses on reducing vehicle trips during commute hours. Project applicants shall coordinate with the County on project-specific requirements for a TDM plan related to a County TDM Ordinance, if adopted, or similar requirement. In lieu of an adopted TDM Ordinance at the county-level, projects should develop a TDM program that includes trip reduction policies supported by the SANDAG *Mobility Management Guidebook* (SANDAG 2019) or the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). Any TDM plans that developed outside of compliance with a County-adopted ordinance will be reviewed and approved by the County. **MM-AQ-13.** Require all new County-owned and -operated buildings proposed within the Alpine CPA to achieve zero net energy. Additionally, all landscaping equipment used at County owned and operated buildings and managed landscaped areas would be all electric.	
	Impact-C-AQ-2: Result in a Cumulatively Considerable Increase in Nonattainment Pollutant from Cumulative Projects. Similar to the 2011 General Plan, the proposed project would cause a potentially significant cumulative impact related to nonattainment criteria air pollutants. Due to the increased	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Air-2.1** through **Air-2.13,** and **Air-4.1, and MM-AQ-1 through MM-AQ-13** as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	density proposed, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.			
Expose Sensitive Receptors to Substantial Pollutant Concentrations	**Impact-AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations.** Due to project specific construction and operation details being unknown, the proposed project would cause a potentially significant impact related to sensitive receptors. Due to the potential for exacerbated pollutant exposure, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Air-2.1** through **Air-2.13,** and **Air-4.1,** and **MM-AQ-13** as described above..	SU
	Impact-C-AQ-3: Result in a Cumulatively Considerable Exposure of Sensitive Receptors to Substantial Pollutant Concentrations. Similar to the 2011 General Plan, the proposed project would cause a potentially significant cumulative impact related to sensitive receptors. This would be considered a significant impact. Due to the potential for exacerbated pollutant exposure, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.		Implement 2011 General Plan Update PEIR Mitigation Measures **Air-2.1** through **Air-2.13,** and **Air-4.1,** and **MM-AQ-13** as described above.	SU
Create Objectionable Odors	Direct and cumulative impacts related to emissions of odors are less than significant	LS	No New Mitigation Measures are Required.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
2.4 Biological Resources				
Project Impacts				
Substantial Adverse Effect on any Candidate, Sensitive, or Special-Status Species in Local or Regional Plans, Policies or Regulations	**Impact-BIO-1: Adversely Affect Special-Status Plant and Wildlife Species**. Increased density and intensity associated with the proposed project would result in a more severe loss of sensitive habitat and the special-status plant and wildlife species it supports compared to the prior EIRs. This would be considered a significant impact.	PS	**Bio-1.1:** Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval. **Bio-1.2:** Implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space. In addition, continue preparation of MSCP Plans for North County and East County. **Bio-1.3:** Implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County MSCP Subarea Plan. **Bio-1.4:** Coordinate with nonprofit groups and other agencies to acquire preserve lands. **Bio-1.5:** Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			locate special status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate. **Bio-1.6:** Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. **Bio-1.7:** Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. **MM-Bio-1:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially significant biological resource is present on site. If it is determined that potentially significant biological resources are present on site, compliance with the County's Guidelines for Determining Significance – Biological Resources, shall be required. This may require, pursuant to PDS staff determination, the preparation of a technical report or memorandum that would evaluate the biological of the resource and identify appropriate mitigation measures, as required	
	Impact-C-BIO-1: Cumulatively Considerable Contribution to Adverse Effects on Special-Status	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1 through Bio-1.7 and MM-BIO-1.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Plant and Wildlife Species. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase habitat loss and potential impacts on special-status species. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.			
Substantial Adverse Effect on any Riparian Habitat or Other Sensitive Natural Community Identified in Local or Regional Plans, Policies, Regulations or by CDFW, NMFS, or USFWS	**Impact-BIO-2: Adversely Affect Riparian Habitat and Other Sensitive Natural Communities.** Increased density and intensity associated with the proposed project would result in a more severe loss of riparian habitat and other sensitive natural communities compared to the prior EIRs. This would be considered a significant impact.	PS	**Bio-2.1:** Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. **Bio-2.2:** Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. Also continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			from the California Department of Fish and Game for all project-related disturbances of streambeds. **Bio-2.3:** Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. **Bio-2.4:** Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1 through Bio-1.7 and MM-Bio-1, as described above.	
	Impact-C-BIO-2: Cumulatively Considerable Contribution to Adverse Effects on Riparian Habitat and Other Sensitive Natural Communities. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase riparian habitat loss. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1 through Bio-1.7 and Bio-2.1 through Bio-2.4, and MM-Bio-1.	SU
Substantial Adverse Effect on Federally Protected Wetlands as Defined by	**Impact-BIO-3: Adversely Affect Federally Protected Wetlands.** Increased density and intensity associated with the proposed project would result in a more severe direct loss of federally protected and County	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1, Bio-1.5 through Bio-1.7, and Bio-2.2 through Bio-2.4, and MM-Bio-1.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Section 404 of the Clean Water Act	RPO wetlands compared to the prior EIRs. This would be considered a significant impact.			
Substantial Interference with the Movement of any Native Resident or Migratory Fish or Wildlife Species	**Impact-BIO-4: Adversely Affect Wildlife Movement Corridors and Nursery Sites.** Increased density and intensity associated with the proposed project would have the potential to result in greater impacts on sensitive habitats, some of which have the potential to include nursery sites. As such, direct and indirect impacts on wildlife nursery sites associated with the Alpine CPU would be more severe than those identified in the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1 through Bio-1.7 and Bio-2.3, and MM-Bio-1.	SU
	Impact-C-BIO-3: Cumulatively Considerable Contribution to Adverse Effects on Wildlife Corridors and Nursery Sites. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would result in a greater loss of nursery sites. Therefore, the proposed project's contribution to this impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Bio-1.1 through Bio-1.7 and Bio-2.3, and MM-Bio-1.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Conflict with any Applicable Local Policies or Ordinances	No New or More Severe Impacts Than Previously Identified in the Prior EIRs. Because development associated with the proposed project would be required to comply with the aforementioned ordinances and policies protecting biological resources, potential impacts would be less than significant. Therefore, potential impacts would be similar to those identified in the prior EIRs.	LS	No mitigation is required.	LS
	No New or More Severe Cumulative Impacts Than Previously Identified in the Prior EIRs. Potential project-level impacts would be less than significant and would be similar to those identified in the prior EIRs. Additionally, implementation of General Plan policies would further reduce the potential for development to conflict with local policies and ordinances protecting biological resources. Because cumulative projects would also be required to comply with these policies and ordinances, the proposed project's contribution to cumulative impacts would be less than significant and similar to the contribution identified in the prior EIRs and would not be cumulatively considerable.	LS	No mitigation is required.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Habitat Conservation Plans	No New or More Severe Impacts Than Previously Identified in the Prior EIRs. Because future development within the SCMSCP would be required to comply with the BMO and make MSCP Conformance Findings, impacts would be less than significant.	LS	No mitigation is required.	LS
	No New or More Severe Cumulative Impacts Than Previously Identified in the Prior EIRs. Future development associated with the proposed project would be required to comply with the applicable HCPs and NCCPs, as well as the local policies and ordinances that support them, and the proposed project would result in less than significant project-level impacts associated with conflicts with adopted HCPs and NCCPs, similar to the prior EIRs. Additionally, implementation of General Plan policies identified in policies identified in Section 2.4.2.1 would further reduce the potential for proposed project-related development to conflict with adopted HCPs and NCCPs.	LS	No mitigation is required.	LS
2.5 Cultural Resources				
Project Impacts				
Substantial Adverse Change in the Significance of a	**Impact-CUL-1: Change the Significance of a Historical Resource**. Due to increased development densities proposed in	PS	**Cul-1.1:** Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Historical Resource as Defined in Section 15064.5	the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. This would be considered a significant impact.		reviews and applying mitigation when impacts are significant. **Cul-1.2:** Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. **Cul-1.3**: Initiate a new effort to identify and catalog historic and potentially historic resources within unincorporated San Diego County. This process will require public participation and evaluation by County staff and the Historic Site Board. The anticipated result of this effort is: 1) at minimum, landowners will be better informed of potential resources on their properties as well as the options available to them under the State/National Register or the Mills Act; and 2) in some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board. **Cul-1.4**: Support the Historic Site Board in their efforts to provide oversight for historic resources. **CUL-1.5**: Ensure landmarking and historical listing of County owned historic sites **Cul-1.6**: Implement, and update as necessary, the County Guidelines for Determining Significance for Cultural Resources to identify and minimize adverse impacts to historic and archaeological resources **Cul-1.7**: Identify potentially historic structures within the County and enter the information in the Department of Planning and Land Use property	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			database. Identification will occur by compiling information from all available sources (e.g., County surveys, Historic Site Board, information received from SOHO and community planning groups, information from other jurisdictions, etc.) and shall be updated at least every five years. **Cul-1.8**: Revise the Resource Protection Ordinance (RPO) to apply to the demolition or alteration of identified significant historic structures. **MM-CUL-1:** Important historic resources in the Alpine Plan area shall be protected through utilization of dedicated open space. **MM-CUL-2:** Support the preparation of an inventory of significant historical landmarks in Alpine **MM-CUL-3:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially historical significant resource is present on site. If it is determined that potentially significant historical resources are present on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County Planning & Development Services (PDS) staff determination, the preparation of a technical report or memorandum that would evaluate the historical significance of the resource and identify appropriate mitigation measures, as required.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact-C-CUL-1: The proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Cul-1.1 through Cul-1.8, and MM-CUL-1 through MM-CUL-3.	LS
Substantial Adverse Change in the Significance of an Archaeological Resource as Defined in Section 15064.5	**Impact-CUL-2: Change the Significance of an Archaeological Resource**. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to archaeological resources compared to the prior EIRs. This would be considered a significant impact.	PS	**Cul-2.1**: Develop management and restoration plans for identified and acquired properties with cultural resources. **Cul-2.2**: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information **Cul-2.3**: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations **Cul-2.4**: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review **Cul-2.5**: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys **Cul-2.6**: Protect significant cultural resources by facilitating the identification and acquisition of	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information. **MM-CUL-4:** Important archaeological resources in the Alpine Plan area shall be protected through utilization of dedicated open space. **MM-CUL-5:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a), and the RPO has the potential to be located on site. If it is determined that an archaeological resource has the potential to be located on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County PDS staff determination, the preparation of a technical report or memorandum that would evaluate the significance of the resource and identify appropriate mitigation measures.	
	Impact-C-CUL-2: The proposed project would cause a more severe potentially significant impact related to archaeological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Cul-2.1 through Cul-2.6, and MM-CUL-4, and MM-CUL-5.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	impact would be cumulatively considerable.			
Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature	**Impact-CUL-3: Destroy a Unique Paleontological Resource.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to paleontological resources and unique geology compared to the prior EIRs. This would be considered a significant impact.	PS	**Cul-3.1**: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological resources monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant. **Cul-3.2:** Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources. **MM-CUL-6**: Paleontological monitoring programs will be implemented for projects that are located within paleontological sensitive areas that include Subarea 2. The monitoring program will be implemented on a project-by-project basis and conform to all applicable federal, state, and local regulations and the County's Guidelines for Determining Significance - Paleontological Resources. **MM-CUL-7:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any unique geology is present on site. If it is determined that unique geology is present on site, compliance with the County's Guidelines for Determining Significance – Unique Geology, shall be required. This may require, pursuant to County PDS staff determination, incorporation of project design features and mitigation measures to reduce impacts.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact-C-CUL-3: The proposed project would cause a more severe potentially significant impact related to paleontological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Cul-3.1 and Cul-3.2, and MM-Cul-6 and MM-Cul-7.	LS
Disturb any Human Remains, Including Those Interred Outside of Formal Cemeteries	**Impact-CUL-4: Disturb Human Remains.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to human remains compared to the prior EIRs. This would be considered a significant impact.	PS	**Cul-4.1**: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.	LS
	Impact-C-CUL-4: The proposed project would cause a more severe potentially significant impact related to human remains compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Cul-4.1.	LS
2.6 Greenhouse Gas Emissions and Climate Change				
Project Impacts				
Generation of GHG Emissions in 2030 and 2050	**Impact-GHG-1 and Impact-C-GHG-1: Result in a Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment in 2030.** The proposed project would result in emissions of GHGs as a result of	PS	**CC-1.1:** Update the County Green Building Program to increase effectiveness of encouraging incentives for development that is energy efficient and conserves resources through incentives and education **CC-1.2** Prepare a County Climate Change Action Plan with an update baseline inventory of greenhouse gas	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	construction and operation of development in the Alpine CPA. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan to achieve the State's 2030 GHG emissions reduction target. In addition, the proposed project would not achieve VMT reductions consistent with State climate goals. This would be considered a significant impact and would be cumulatively considerable. **Impact-GHG-2 and Impact-C-GHG-2: Result in Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment in 2050.** The proposed project would result in emissions of GHGs as a result of construction and operation of development in the Alpine CPA. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan. Further, the 2017 Scoping Plan identifies that existing technologies and feasible measures would not be adequate to achieve the State's 2050 GHG reduction goal. In addition, the		emissions from all sources, more detailed greenhouse gas emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis **CC-1.3** Work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation. **CC-1.4** Review traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time **CC-1.5** Coordinate with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. Also support water conservation pricing (e.g., tiered rate structures) to encourage efficient water use **CC-1.6** Implement and expand County-wide recycling and composting programs for residents and businesses. Require commercial and industrial recycling **CC-1.7** Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable.		Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner, the County will prepare its own threshold. **CC-1.8** Revise County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. **CC-1.9** Coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency to reduce GHG emissions. **CC-10** Continue to implement the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), MSCP and prepare MSCP Plans for North and East County in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits and to restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			runoff on-site can drastically reduce the need for energy-intensive imported water at the site.). **CC-1.11** Revise the Ordinance Relating to Water Conservation for Landscaping to further water conservation to: • Create water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. • Use reclaimed water for landscape irrigation. • Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff. • Provide education about water conservation and available programs and incentives. **CC-1.12** Continue to coordinate with resource agencies, CALFIRE, and fire districts to minimize potential wildfire risks in the County and to plan for the potential increase in future risk that may result from Climate Change. **CC-1.13:** Continue to implement and revise as necessary the Regional Trails Plan as well as the Community Trails Master Plan to connect parks and publicly accessible open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. **CC-1.14:** Provide public education and information about options for reducing greenhouse gas emissions. In addition to addressing land development, education	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			should also address purchasing, conservation, and recycling. **CC-1.15:** Reduce VMT and encourage alternative modes of transportation by implementing the following measures: • During Community Plan updates, establish policies and design guidelines that: encourage commercial centers in compact walkable configurations and discourage "strip" commercial development • Expand community bicycle infrastructure. • Revise the Off-Street Parking Design Manual to include parking placement concepts that encourage pedestrian activity and concepts for providing shared parking facilities. • Establish comprehensive planning principles for transit nodes such as the Sprinter Station located in North County Metro. • Continue to locate County facilities near transit facilities whenever feasible. • Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities. • Continue to coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			• Update the Zoning Ordinance to require commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles, and flex cars. **CC-1.16** Develop and implement a Strategic Energy Plan to increase energy efficiency in existing County buildings and set standards for any new County facilities that will ultimately reduce GHG emissions. This will include implementation of the following measures as will be detailed within the Plan: • Improve energy efficiency within existing operations through retrofit projects, updated purchasing policies, updated maintenance/operations standards, and education. • Improve energy efficiency of new construction and major renovations by applying design criteria and participating in incentive programs. • Provide energy in a reliable and cost-effective manner and utilize renewable energy systems where feasible. • Monitor and reduce energy demand through metering, building controls, and energy monitoring systems. • Increase County fleet fuel efficiency by acquiring more hybrid vehicles, using alternative fuels, and by maintaining performance standards for all fleet vehicles. **CC-1.17** Develop and implement a County Operations Recycling Program. This will include implementation	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			of the following measures as will be detailed within the Program: • Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). • Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas. • Recover by-product methane to generate electricity. • Provide education and publicity about reducing waste and available recycling services. **CC-1.18** Develop and implement a County Operations Water Conservation Program. **CC-1.19** Revise the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock. **MM-GHG-1**: Require all development in the Alpine CPA to demonstrate consistency with the 2017 Scoping Plan through the implementation of all applicable BMPs. All development subject to the discretionary review process will identify which BMPs are applicable to the project and provide supporting evidence through CEQA review. This determination shall be provided through a BMP Consistency Review Checklist, developed by the County, to determine whether an individual project would be consistent with required measures.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Conflict with Applicable Plan(s) in 2030 and 2050	**Impact-GHG-3 and Impact-C-GHG-3: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing Emissions of GHGs by 2030.** The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan, which identifies measures to achieve the State's 2030 GHG reduction target. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable. **Impact GHG-4 and C-GHG-4: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing Emissions of GHGs by 2050.** The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan, which identifies measures to achieve the State's 2030	PS	Implement 2011 General Plan Update Mitigation Measures CC-1.1 through CC-1.19, and **MM-GHG-1** as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	GHG reduction target. The 2017 Scoping Plan identifies that existing technologies and feasible measures would not be adequate to achieve the State's 2050 GHG reduction goal. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable.			
2.7 Wildfire				
Project Impacts				
Adopted Emergency Response or Emergency Evacuation Plan	**Impact-WILD-1: Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan.** There is the potential that emergency response and evacuation would be insufficient during wildfires due to the substantial potential growth that could occur under the Alpine CPU. Consequently, this growth could substantially impair existing emergency response and evacuation plans, potentially increasing the risk to loss of life and property in the event of a wildfire. This would be considered a significant impact.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures MM-Haz-3.1 through MM-Haz-3.3, MM-Haz-4.4, MM-Pub-1.5, and Alpine CPU Measures MM-Tra-4.1 through MM-Tra-4.3 (see Appendix B, General Plan EIR Mitigation Measures, or corresponding section in this table). **MM-WILD-1:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if subsequent projects are located within a High or Very High FHSZ. Subsequent projects within these zones would be required to prepare an FPP that is subject to the review and approval of the Alpine Fire Protection District and the San Diego County Fire Authority. Prior to preparation of an FPP, subsequent projects shall coordinate with appropriate fire agencies to ensure that modeling of the FPP and design of the project is appropriate to meet the Fire Adapted Communities Strategy. The FPP shall assess a project's compliance with current regulatory codes and ensure that impacts resulting from wildland fire hazards have	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			been adequately mitigated. The FPP shall identify evacuation routes within the vicinity of the project site and those routes shall not impair the ability of surrounding development to evacuate. Prepared FPPs for projects within 1 mile of the CNF, shall be provided to CNF for review. **MM-WILD-2:** As a part of the discretionary review of subsequent projects that have an occupancy of 200 or more, proposed under the Alpine CPU, an Evacuation Plan would be required. The Evacuation Plan shall not be in conflict with the community-wide evacuation plans that are part of the Alpine Community Wildfire Protection Plan that has been prepared by the Alpine Fire Safe Council. Evacuation Plans shall include analysis regarding the evacuation capabilities, improving on- and off-site roadways, and any improvements necessary to handle the egress and ingress during an evacuation. **MM-WILD-3:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, identify the adequacy of the access and evacuation routes relative to the degree of development or use (including but not limited to road width, road type, length of dead-end roads, and turnouts). If the routes are determined to be inadequate as part of this review, the Fire Authority Having Jurisdiction (FAHJ) will identify the required improvements to be made.	
	Impact-C-WILD-1: Result in a Cumulatively Considerable Contribution to the Impairment of an Adopted Emergency Response or Evacuation Plans.	PS	Implement 2011 General Plan EIR mitigation measures MM-Haz-3.1 through MM-Haz-3.3, MM-Haz-4.4, MM-Pub-1.5, and MM-Tra-4.1 through MM-Tra-4.3 and MM-WILD-1 through MM-WILD-3.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	The proposed project would cause a greater impact related to the impairment of Adopted Emergency Response or Evacuation Plans compared to existing conditions and the impact identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.			
Expose Receptors to Pollutants from Wildfire	**Impact-WILD-2: Expose Receptors to Pollutants from Wildfire.** Future development associated with the Alpine CPU would have the potential to exacerbate wildfire risk by introducing a substantial number of new residents to less developed areas of the community, who in turn could be exposed to pollutant concentrations in the event of a wildfire. This would be considered a significant impact.	PS	Implement 2011 General Plan EIR mitigation measures MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Hyd-3.2, MM-Pub-1.4, MM-Pub-1.7, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures or corresponding section in this table) , and MM-WILD-1 through MM-WILD-3 described above.	SU
	Impact-C-WILD-2: Result in a Cumulatively Considerable Contribution to the Exposure of Receptors to Pollutants from Wildfire. The proposed project would cause a greater impact related to the exposure of receptors to pollutants from wildfire compared to existing conditions and the impacts identified in the 2011 General Plan EIR. Therefore, the proposed project's	PS	Implement MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Hyd-3.2, MM-Pub-1.4, MM-Pub-1.7, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures) and MM-WILD-1 through MM-WILD-3.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	contribution to this impact would be cumulatively considerable.			
Exacerbate Wildfire Risk from New Infrastructure	**Impact-WILD-3: Exacerbate Wildfire Risk from New Infrastructure.** Future development associated with the Alpine CPU within the less developed subareas would likely require paving of new roads to improve emergency services and evacuation access or paving over existing dirt roads and the extension of utilities such as electrical power lines. Areas of increased density and land use intensity are located within the village boundary (Subareas 2 and 6), directly south of a new fire station, and an area adjacent to the current primary evacuation route (Subarea 4). However, most wildfires are started near developed areas and roadways, so future development and associated infrastructure within these areas would have the potential to exacerbate wildfire risk, which would be a potentially significant impact.	PS	Implement MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Lan-1.2, MM-Pub-1.3 through MM-Pub-1.6, MM-Pub-1.8, MM-Tra-1..4, and MM-Tra-4.3 (see Appendix B, General Plan EIR Mitigation Measures or corresponding section of this table), and MM-WILD-1 through MM_WILD-3.	SU
	Impact-C-WILD-3: Result in a Cumulatively Considerable Contribution the Exacerbation of Wildfire Risk from New Infrastructure. The proposed project would cause a greater impact related to the exacerbation of wildfire risk from new infrastructure compared to existing conditions and the impacts	PS	Implement MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Lan-1.2, MM-Pub-1.3 through MM-Pub-1.6, MM-Pub-1.8, MM-Tra-1..4, and MM-Tra-4.3 (see Appendix B, General Plan EIR Mitigation Measures or corresponding section of this table), and MM-WILD-1 through MM_WILD-3.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.			
Expose People or Structures to Significant Risks from Post-Wildfire Hazards	**Impact-WILD-4: Expose People or Structures to Significant Risks from Post-Wildfire Hazards.** The proposed project would both potentially exacerbate wildfire risk and increase risks to life and property by placing a substantial number of new housing units and residents in an area prone to wildfire and susceptible to post-fire hazards. Consequently, the proposed project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes. This would be considered a significant impact.	PS	Implement MM-Haz-4.4, MM-Hyd-3.1, MM-Hyd-3.2, MM-Hyd-3.3, MM-Hyd-6.1, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures or corresponding section of this table), and MM-WILD-1 through MM-WILD-3.	SU
	Impact-C-WILD-4: Result in a Cumulatively Considerable Contribution to On- or Off-site Flooding. The proposed project would cause a greater impact related to the exposure of receptors to pollutants from wildfire compared to existing conditions and the impacts identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement MM-Haz-4.4, MM-Hyd-3.1, MM-Hyd-3.2, MM-Hyd-3.3, MM-Hyd-6.1, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures or corresponding section of this table), and MM-WILD-1 through MM-WILD-3	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
2.8 Hydrology and Water Quality				
Project Impacts				
Violate any Water Quality Standards	**Impact-HYD-1: Violate Surface Water Quality Standards and Requirements during Construction Activities.** Due to increased development densities in the proposed project, construction of the proposed project would cause a more severe impact related to surface water quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	**Hyd-1.2:** Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems. **Hyd-1.3:** Establish and implement LID standards for new development to minimize runoff and maximize infiltration. **Hyd-1.4:** Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources. **Hyd-1.5:** Utilize the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. **Hyd-1.6:** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water and sanitation districts. **Hyd-1.7:** Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans. **Hyd-1.8:** Allow wastewater facilities contingent upon approval of Major Use Permit to ensure facilities are adequately sized.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Hyd-1.9: Review septic system design, construction, and maintenance in cooperation with the Regional Water Quality Control Board through the Septic Tank Permit Process. **Hyd-1.10:** Coordinate with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative On-site Wastewater Treatment Systems.	
	Impact-HYD-2: Violate Surface Water Quality Standards and Requirements during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed project would cause a more severe impact related to surface water quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.10, as described above.	LS
	Impact-HYD-3: Violate Groundwater Quality Standards and Requirements during Construction Activities. Due to increased development densities in the proposed project, construction of the proposed project would cause a more severe potentially significant impact related to groundwater quality standards and requirements compared to the impact identified in the prior EIRs. This would be	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.10, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	considered a significant impact prior to mitigation.			
	Impact-HYD-4: Violate Groundwater Quality Standards and Requirements during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed project would cause a more severe potentially significant impact related to groundwater quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.10, as described above.	SU
	Impact-C-HYD-1: Result in a Cumulatively Considerable Contribution to Violating Water Quality Standards and Requirements. The proposed project would cause a similar impact related to violating water quality standards and requirements compared to the impact identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.10, as described above.	SU
Deplete Groundwater Supplies	**Impact-HYD-5: Substantially Deplete Groundwater Supplies or Interfere Substantially with Groundwater Recharge.** Due to increased development densities in the proposed project, the proposed	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.5, as described above. **Hyd-2.1:** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	project would cause more severe potentially significant impact related to depleting groundwater supplies and interfering with recharge compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.		applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities. **Hyd-2.2:** Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water. **Hyd-2.4:** Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs. **Hyd-2.5:** Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains/floodways.	
	Impact-C-HYD-2: Result in a Cumulatively Considerable Contribution to Substantially Depleting Groundwater Supplies or Interfering Substantially with Groundwater Recharge. The proposed project would cause a similar impact related to depleting groundwater supplies and interfering with groundwater recharge compared to the impacts identified in the prior EIRs. Therefore, the proposed	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.1 through Hyd-1.5, Hyd-2.1, Hyd-2.2, Hyd-2.4, and Hyd-2.5, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	project's contribution to this impact would be cumulatively considerable.			
Erosion or Siltation	**Impact-HYD-6: Result in Substantial Erosion or Siltation On or Off Site during Construction Activities.** Due to increased development densities in the proposed project, construction of the proposed project would cause more severe impacts related to erosion or siltation on or off site compared to impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2, Hyd-1.3, and Hyd-1.5, as described above. **Hyd-3.1:** Implement and revise, as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying storm water. **Hyd-3.2:** Implement and revise as necessary the RPO to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the RPO to the extent that it will allow for one comprehensive approach to steep slope protections. **Hyd-3.3:** Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.	LS
	Impact-HYD-7: Result in Substantial Erosion or Siltation On or Off Site during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed project would cause more severe impacts related to erosion or siltation on or off site compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.1 through Hyd-3.3.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact-C-HYD-3: Result in a Cumulatively Considerable Contribution to Erosion or Siltation. Increases in impervious surfaces from individual projects associated with the proposed project could result in erosion and siltation that would be individually limited, but cumulatively considerable when taken into account together. As such, there is a potential that buildout of the proposed project as a whole could include impervious surfaces that, when combined with cumulative growth and development, would result in erosion and siltation and a cumulatively considerable impact. Consequently, the proposed project's contribution to cumulative impacts associated with erosion and siltation would be more severe than that identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.1 through Hyd-3.3.	LS
Flooding	**Impact-HYD-8: Result in Flooding On or Off Site during Construction Activities.** Due to increased development densities in the proposed project, construction of the proposed project would cause more severe potentially significant impacts related to flooding on or off site compared to the impacts identified in the prior EIRs. This would be	PS	Implement 2011 General Plan Update Mitigation Measures MM-Hyd-1.2 through MM-Hyd-1.5, and MM-Hyd-2.5, as described above. **MM-Hyd-4.1:** Implement the Flood Damage Prevention Ordinance to reduce flood losses in specified areas. **MM-Hyd-4.2:** Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	considered a significant impact prior to mitigation.		**MM-Hyd-4.3:** Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit.	
	Impact-HYD-9: Result in Flooding On or Off Site during Operational Activities. Due to increased development in the proposed project, operation of the proposed project would cause more severe potentially significant impacts related to flooding on or off site compared to the impacts identified in the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3.	LS
	Impact-C-HYD-4: Result in a Cumulatively Considerable Contribution to On- or Offsite Flooding. Increases in impervious surfaces from individual projects associated with the proposed project could result in on- or off-site flooding that would be individually limited, and cumulatively considerable when taken into account together. There is a potential that buildout of the proposed project could include impervious surfaces that, when combined with cumulative growth and development,	PS	Implement 2011 General Plan Update Mitigation Measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	would result in on- or off-site flooding and a cumulatively considerable impact. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.			
Exceed Capacity of Stormwater Systems	**Impact-HYD-10: Exceed Capacity of Existing Stormwater Drainage Facilities.** Due to increased development densities in the proposed project, the proposed project would cause more severe impacts related to exceeding existing stormwater drainage facilities compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update mitigation measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-3.1, and Hyd-4.1 through Hyd-4.3, as described above.	LS
Housing within a 100-year Flood Hazard Area	**Impact-HYD-11: Place Housing within a 100-Year Flood Hazard Area.** Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impacts related to placing housing within a 100-year flood hazard area compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, and Hyd-4.2, as described above. **MM-Hyd-6.1:** Implement the RPO to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems.	LS
Impeding or Redirecting Flood Flows	**Impact-HYD-12: Impede or Redirect Flood Flows.** Due to increased development densities in the proposed project, the proposed project would cause more severe	PS	Implement 2011 General Plan Update mitigation measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-4.1 through Hyd-4.3, and Hyd-6.1, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	potentially significant impacts related to impeding or redirecting flood flows compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.			
Dam Inundation and Flood Hazards	No New or More Severe Impacts than Previously Identified in the 2011 General Plan Update PEIR. There are no dam inundation zones within the Village Boundary, and none of the subareas are located within dam inundation areas. Therefore, direct impacts of the proposed project with regard to the risk of loss, injury, or death involving flooding from the failure of a levee or dam would be less than significant.	LS	No New Mitigation Measures are Required	LS
Seiche, Tsunami, and Mudflow Hazards	**Impact-HYD-13: Expose People to Inundation by Mudflow.** Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impacts related to inundation by mudflow compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.	PS	Implement 2011 General Plan Update mitigation measures Hyd-3.1 through Hyd-3.3, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
2.10 Mineral Resources				
Project Impacts				
Mineral Resource Availability	**Impact-MIN-1: Reduce Mineral Resource Availability.** Due to the increase of land uses incompatible with mining operations allowed by the proposed project, the proposed project would result in a more severe potentially significant impact related to reducing mineral resource availability than determined in the prior EIRs. This would be considered a significant impact.	PS	**Min-1.1:** Assess the impact of new development on mineral resources as required by the County Guidelines for Determining Significance for Mineral Resources. Update the CEQA Guidelines for Determining Significance (Mineral Resources) to include the requirement to evaluate whether access is being maintained to existing mining sites.	SU
	Impact-C-MIN-1: Reduce Mineral Resource Availability. The proposed project, in combination with other growth in the San Diego region, would result in a more severe potentially significant impact related to reducing mineral resource availability than determined in the prior EIRs. Therefore, impacts associated with the loss of available mineral resources would be significant	PS	Implement 2011 General Plan Update PEIR Mitigation Measure Min-1.1.	SU
Mineral Resource Recovery Sites	**Impact-MIN-2: Preclude Future Mineral Resource Recovery Sites.** Due to the higher density development and encroachment of incompatible uses on potential or likely mineral resource deposits in land categorized as MRZ-3, the proposed project would result in more severe impacts on mineral resource recovery sites	PS	Implement 2011 General Plan Update PEIR Mitigation Measure Min-1.1.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	compared to the prior EIRs. This would be considered a significant impact.			
	Impact-C-MIN-2: Preclude Future Mineral Resource Recovery Sites. The proposed project, in combination with other growth in the San Diego region, would result in more severe impacts on mineral resource recovery sites compared to the prior EIRs. Therefore, impacts associated with mineral resources recovery sites would be significant.	PS	Implement 2011 General Plan Update PEIR Mitigation Measure Min-1.1.	SU
2.11 Noise and Vibration				
Project Impacts				
Expose Persons to or Generate Noise Levels in Excess of Established Standards	**Impact-NOI-1: Generate Excessive Noise Levels.** Due to increased development densities proposed in the Alpine CPA, as well as proposed new roadway connections, the proposed project would cause a more severe potentially significant impact related to excessive transportation noise levels from roadways compared to the prior EIRs. This would be considered a significant impact**.**	PS	**Noi-1.1:** Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element). **Noi-1.2:** Revise the Guidelines for Determining Significance for new developments where exterior noise level on patios or balconies for multi-family residences or mixed-use development exceeds 65 dBA (CNEL), a solid noise barrier is incorporated into the building design of balconies and patios for units that exceed 65 dBA (CNEL) while still maintaining the openness of the patio or balcony. **Noi-1.3:** Require an acoustical study for projects proposing amendments to the County General Plan	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Land Use Element and/or Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan. **Noi-1.4:** Edit the Guidelines for Determining Significance standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise. **Noi-1.5:** Coordinate with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County. **Noi-1.8:** Implement and/or establish procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County. **Noi-1.9:** Coordinate with Caltrans and the DPLU Landscape Architect, and receive input from community representatives as appropriate (e.g., Planning or Sponsor Group) to determine the appropriate noise mitigation measure (planted berms, noise attenuation barriers or a combination of the two) to be required as a part of the proposals for roadway improvement projects and ensure that the County's Five Year Capital Improvement Program and	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Preliminary Engineering Reports address noise impacts and appropriate mitigation measures for road improvement projects within or affecting the unincorporated area of the County. **MM-NOI-1:** For any new multi-family residences or mixed-use development proposed subsequent to the adoption of the Alpine CPU, private residential patios or balconies will not be required to comply with the 65 dBA (CNEL), provided that all of the following criteria are met: a) A barrier required around the patio/balcony per applicable building codes (i.e., for safety), if any, will be of solid construction with a minimum surface density of 4 pounds per square foot (e.g., concrete block, stucco, Plexiglas, or other solid material of appropriate thickness). Additional height beyond the minimum code requirement is not required. b) The remainder of the building will be designed and constructed to limit interior noise levels to 45 dBA (CNEL) or less within private living spaces. c) Owners of units with balconies that do not meet the 65 dBA (CNEL) limit will provide occupancy disclosure notices to all future tenants/owners regarding potential noise impacts.	
	Impact-C-NOI-1: Generate Excessive Noise Levels. The proposed project would cause more severe potentially significant impacts related to	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Noi-1.1, Noi-1.2, Noi-1.3, Noi-1.4, Noi-1.5,**	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	excessive noise levels from roadways compared to the prior EIRs. Consequently, the proposed project's contribution to cumulative impacts associated with excessive noise levels would be more severe than those identified in the prior EIRs and would be cumulatively considerable.		**Noi-1.8,** and **Noi-1.9,** as well as Alpine CPU **MM-NOI-1**, as described above.	
Expose Persons to or Generate Excessive Groundborne Vibration or Groundborne Noise Levels	**Impact-NOI-2: Generate Excessive Groundborne Vibration.** Due to increased development densities proposed in the Alpine CPA, as well as proposed new roadway connections, the proposed project would cause more severe potentially significant impacts related to excessive groundborne vibration or groundborne noise levels from construction activity compared to the prior EIRs. This would be considered a significant impact.	PS	**Noi-2.2:** Revise the County CEQA determinations of significance to reflect limits in the Noise Compatibility Guidelines and Noise Standards [Policy N-3.1]. Periodically review the Guidelines for Determining Significance to incorporate standards for minimizing effects of groundborne vibration during project operation or construction. **Noi-2.3:** Review project applications for industrial facilities to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. Revise CEQA Guidelines for Determining Significance to incorporate appropriate noise attenuation measures for minimizing industrial-related noise. **Noi-2.4:** Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a "buffer zone" to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Permanent Increase in Ambient Noise Levels	**Impact-NOI-3: Result in a Permanent Increase in Ambient Noise Levels.** Due to increased development densities proposed in the Alpine CPA, potential new commercial uses, and proposed new roadway connections, the proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways and commercial land uses compared to the prior EIRs. This would be considered a significant impact.	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3,** and **Noi-2.4,** as described above. **Noi-3.1:** Ensure that for new County road improvement projects either the County's Noise Standards are used to evaluate noise impacts or the project does not exceed 3 decibels over existing noise levels [Policy N-4.6]. **Noi-3.2**: Work with the project applicant during the review of either the building permit or discretionary action (whichever is applicable) to determine appropriate noise reduction site design techniques that include: • Orientation of loading/unloading docks away from noise sensitive land uses. • Setbacks or buffers to separate noise generating activities from noise sensitive land uses. • Design on-site ingress and egress access away from noise sensitive land uses [Policy N-5.1].	SU
	Impact-C-NOI-2: Result in a Permanent Increase in Ambient Noise Levels. The proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways, industrial, commercial, and agricultural land uses compared to the prior EIRs. Consequently, the proposed project's contribution to cumulative impacts associated with a permanent increase	PS	Implement 2011 General Plan Update PEIR Mitigation Measures **Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3, Noi-2.4, Noi-3.1,** and **Noi-3.2,** as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	in ambient noise levels would be similar to those identified in the prior EIRs and would be cumulatively considerable.			
Temporary or Periodic Increase in Ambient Noise Levels	**Impact-NOI-4: Cause a Temporary Increase in Ambient Noise Levels.** Due to increased development densities proposed in the Alpine CPA, as well as new roadway connections, the proposed project would cause more severe potentially significant impacts related to temporary increases in noise levels from construction activities and intermittent nuisance noise compared to the prior EIRs. This would be considered a significant impact.	PS	**Noi-4.1:** Periodically review and revise the Noise Ordinance and Section 6300 of the Zoning Ordinance as necessary to ensure appropriate restrictions for intermittent, short-term, or other nuisance noise sources. **Noi-4.2:** Augment staff and equipment as appropriate to facilitate enforcement of the Noise Ordinance. **MM-NOI-2:** Future discretionary projects within the Alpine CPA area shall implement best practices to reduce construction noise at nearby sensitive receptors to an average sound level of 75 dBA Leq or less for an 8-hour period, between 7 a.m. and 7 p.m. Measures to reduce construction noise shall be included in the contractor specifications and may include, but are not limited to, the following: • Limit construction activities to between 7:00 a.m. and 7:00 p.m. Monday through Saturday; no construction activities should occur at any time on Sunday or holidays (January 1, the last Monday in May, July 4, the first Monday in September, the fourth Thursday in November, and December 25). Personnel should not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours. • Equip construction equipment with noise-reduction features such as intake silencers,	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			mufflers, and engine shrouds that are no less effective than those originally installed by the manufacturer. • Switch off construction equipment when it is not in use. • Locate stationary noise-generating equipment (e.g., compressors, generators, etc.), staging areas, and laydown areas as far as possible from adjacent residential receivers. • Prohibit haul trucks from idling on site or in the project vicinity for periods greater than 5 minutes, except as needed to perform a specified function (e.g., concrete mixing). • Schedule high noise-producing construction activities during periods that are least sensitive, such as during daytime hours when neighboring residents are generally away at work. • Acoustically shield stationary equipment located near residential receivers with temporary noise barriers. • Limit on-site vehicle speeds to 15 miles per hour (mph) or less. • Route construction-related truck traffic away from noise-sensitive areas to the extent feasible. • Utilize "quiet" air compressors and other stationary noise sources where technology exists.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			• Prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who will be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler) and will require that reasonable measures be implemented to correct the problem.	
Excessive Noise Exposure from a Private Airstrip	No New or More Severe Impacts Than Previously Identified. None of the land use changes proposed as part of the project would occur close to the airfield site. Therefore, no noise impacts related to this private airstrip would occur, and the proposed project would result in less than significant impacts related to excessive noise exposure from a public or private airport.	LS	No New Mitigation Measures are Required	LS
2.12 Public Services				
Project Impacts				
Fire Protection and Emergency Services	**Impact-PS-1: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Fire Protection Facilities.** Due to increased development	PS	**Pub-1.1:** Participate in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	densities proposed, the proposed project would cause a more severe potentially significant impact related to the construction of fire protection facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.		**Pub-1.2:** Plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. **Pub-1.3:** Revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities. **Pub-1.4:** Review General Plan Amendments for consistency with the goals and policies of the General Plan such that future development in hazardous wildfire areas will be limited to low-density land uses that do not necessitate extensive new fire protection facilities. **Pub-1.5:** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times. **Pub-1.6:** Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			construction are evaluated along with the development project under review. **Pub-1.7:** Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues. **Pub-1.8:** Require CEQA reviews on new public facilities (fire, sheriff, libraries, etc.) or significant expansions and mitigation of environmental impact to the extent feasible. **Pub-1.9:** Implement procedures to ensure new development projects fund their fair share toward fire services facilities including the development of a long-term financing mechanism, such as an impact fee program or community facilities development, as appropriate. Large development projects are required to provide their fair share contribution to fire services either by providing additional funds and/or development of infrastructure.	
	Impact C-PS-1: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Fire Protection Facilities. The proposed project would cause a more severe potentially significant impact related to fire protection facilities compared to the prior EIRs. Therefore, the		Implement 2011 General Plan Update mitigation measures **Pub-1.1** through **Pub-1.9**, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	proposed project's contribution to this impact would be cumulatively considerable.			
Police Protection	**Impact PS-2: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Police Facilities**. While the proposed project would increase the population within the Alpine Station service area from what was anticipated in the current General Plan, no new or expanded police facilities would be required. Impacts would be less than significant.	LS	No mitigation measures are required.	LS
	Impact C-PS-2: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Police Protection Facilities. The proposed project would cause a more severe potentially significant impact related to police protection facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update mitigation measures **Pub-1.1, 1.2, 1.3, and 1.8,** as described above.	LS
Schools	**Impact-PS-3: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered School Facilities.** Due to increased development densities	PS	Implement 2011 General Plan Update mitigation measures **Pub-1.1, Pub-1.2,** and **Pub-1.3**, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	proposed, the proposed project would cause more severe potentially significant impacts related to the construction of school facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.		**Pub-3.1:** Coordinate with school districts to encourage siting new facilities in accordance with the County's General Plan and encourage implementing feasible mitigation measures to mitigate environmental impacts. **Pub-3.2:** Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available school districts.	
	Impact-C-PS-3: Result in Cumulatively Considerable Adverse Physical Impacts Associated with the Provision of New or Physically Altered School Facilities. The proposed project would cause a more severe potentially significant impact related to school facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR mitigation measures **Pub-1.1, Pub-1.2, Pub-1.3, Pub-3.1,** and **Pub-3.2,** as described above.	LS
Other Public Services/Library Services	**Impact-PS-4: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Library Facilities.** Due to increased development densities proposed, the proposed project would cause more severe potentially significant impacts related to the construction of library facilities compared to the 2011 General Plan	PS	Implement 2011 General Plan Update PEIR mitigation measures **Pub-1.1, Pub-1.2,** and **Pub-1.3**, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	and FCI GPA. This would be considered a significant impact.			
	Impact C-PS-4: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Library Facilities. The proposed project would cause a more severe potentially significant impact related to library facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.	PS	Implement 2011 General Plan Update PEIR mitigation measures **Pub-1.1, Pub-1.2,** and **Pub-1.3**, as described above.	SU
2.13 Recreation				
Project Impacts				
Deterioration of Parks and Recreational Facilities	**Impact-REC-1: Result in Deterioration of Parks and Recreational Facilities.** Future development occurring as part of implementation of the Alpine CPU would result in an increased demand for parks and recreational facilities such that substantial deterioration of these recreational resources would occur.	PS	**Rec-1.1:** Implement Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements. **Rec-1.2:** Coordinate with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and facility needs and issues; and continuing partnerships with other jurisdictions to share operation and	LS

maintenance costs for facilities via joint powers agreements.

Rec-1.4: Participate in discretionary project review of residential projects with 50 or more units to identify park facility needs. Also, implement the Subdivision Ordinance to require the provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, modify development standards and design guidelines to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both abled and disabled individuals.

Rec-1.5: Attain funding for land acquisition and construction of recreational facilities by taking the following actions: implement the PLDO; solicit grants and bonds to fund the operation and maintenance of park and recreation facilities; and form Landscape Improvement Districts and County Service Areas.

Rec-1.6: Acquire trail routes across private lands through direct purchase, easements, and dedication, or by other means from a willing property owner/seller. Encourage the voluntary dedication of easements and/or gifts of land for trails through privately- owned lands, including agricultural and grazing lands.

Rec-1.7: Prioritize the acquisition and development of trail segments in a manner to provide maximum public benefit given available public and private resources and the population served. As part of this effort, also maintain a database of information on the locations, status of easements, classifications, forms of access, and land ownership relative to trail facilities.

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Rec-1.8: Implement and revise as necessary the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. Facilitate inter-jurisdictional coordination for the implementation of these plans. **Rec-1.9:** Consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native American cultural resources. **Rec-1.10:** Develop procedures to coordinate the operation and maintenance of pathways with similar activities for adjacent roads and road rights-of-way. **Rec-1.11:** Prioritize open space acquisition needs through coordination with government agencies and private organizations. Once prioritized, acquire open space lands through negotiation with private land owners and through MSCP regulatory requirements. The operation and management of such acquisitions will continue to be achieved by preparing, implementing, and updating Resource Management Plans and MSCP Area Specific Management Directives (ASMDs) for each open space area.	
	Impact C-REC-1: Result in Deterioration of Parks and Recreational Facilities. The proposed project would cause a similar impact related to the deterioration of parks and recreational facilities compared to the impacts identified in the prior	PS	Implement 2011 General Plan Update PEIR mitigation measures **Rec-1.1 through Rec-1.11**, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.			
Construction of New Recreational Facilities	**Impact-REC-2: Require Construction or Alteration of Recreational Facilities.** The increased population that would occur with implementation of the Alpine CPU would result in the need for new or expanded parks and recreational facilities, the construction of which would result in significant environmental effects.	PS	**Rec-2.1:** Update Community Plans to reflect the character and vision for each individual community; to address civic needs in a community and encourage the co-location of uses; to establish and maintain greenbelts between communities; to prioritize infrastructure improvements and the provision of public facilities for villages and community cores; and to identify pedestrian routes. With these issues addressed in community plans, potential impacts to visual resources, community character, natural resources, cultural resources, and traffic will be substantially lessened should new or expanded recreational facilities be needed in a given community. **Rec-2.2:** Use community design guidelines as a resource when designing park and recreation facilities. This will help ensure that such facilities are consistent with community character. **Rec-2.3:** Amend the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, pathway/trail and recreation/open space networks. Also, add new conservation-oriented design guidelines for rural lands projects as part of this amendment. These measures will assist in the planning for recreational facilities as new development is	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			proposed while minimizing impacts to sensitive resources and community character. **Rec-2.4:** Develop procedures to consider designating trails that correspond to existing (non- designated) trails, paths, or unpaved roadbeds that already have a disturbed tread. This will minimize new impacts to the natural environment and will potentially benefit existing trail users. **Rec-2.5:** Through implementation of Resource Management Plans, monitor and manage preserves and trails such that environmental resources do not become impacted as a result of soil erosion, flooding, fire hazard, or other environmental or man- made effects. Any impacts identified to environmental resources will be restored in accordance with the management directives within the Resource Management Plans. **Rec-2.6:** Develop procedures to encourage the involvement and input of the agricultural community in matters relating to trails on or adjacent to agricultural lands and place a priority on the protection of agriculture.	
	Impact C-Rec-2: Construction or Alteration of Recreational Facilities. The proposed project would cause a similar impact related to the construction or alteration of recreational facilities compared to the impacts identified in the prior EIRs. Therefore, the proposed project's	PS	Implement 2011 General Plan Update PEIR mitigation measures **Rec-2.1 through Rec-2.6**, as described above.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	contribution to this impact would be cumulatively considerable.			
2.14 Transportation and Traffic				
Project Impacts				
Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System	**Impact-TRA-1: Conflict with a Program, Plan, Ordinance or Policy**. The proposed project would exceed residential, employee and retail regional VMT thresholds, and therefore would conflict with the State and County-adopted VMT policies. In addition, the increased density generated by the proposed project would increase the pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety.	PS	**MM-TRA-1:** As part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed project to determine if subsequent projects would be required to implement TDMs, in accordance with the County's TSG. **Tra-1.1:** Coordinate with SANDAG and adjacent cities during updates to the RTP to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways **Tra-1.7:** Implement the San Diego County TIF Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. **Tra-2.1:** Establish coordination efforts with other jurisdictions when development projects will result in a significant impact on city roads. When available, use the applicable jurisdiction's significance thresholds and recommended mitigation measures to evaluate and mitigate impacts.	SU
	Impact-C-TRA-1: Exceed Adopted Levels of Standard. The proposed project would result in cumulative impacts in regard to exceeding cumulative VMT thresholds and being inconsistent with State and County-	PS	Implement 2011 General Plan Update PEIR mitigation measures Tra-1.1, Tra-1.7, and Tra-2.1and Alpine CPU MM-TRA-1, as described above.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	adopted VMT policies. In addition, the increased density generated by the proposed project would contribute to a cumulative impact to pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety.			
Exceeds Thresholds For Vehicle Miles Traveled	**Impact TRA-2: Exceed VMT Thresholds.** The proposed project's VMT would exceed the residential, employee, and retail regional VMT thresholds for the San Diego region.	PS	**MM-TRA-2.** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall require applicants to include a TDM plan and implementation strategy based on the quantifiable measures outlined in the CAPCOA Guidelines or other TDM Guidelines adopted by the County. These strategies may include, but are not limited to: vanpools, telecommute or alternative work schedules, and master planned communities (with design and land use diversity to encourage intra-community travel). Neighborhood Electric Vehicle networks may also be appropriate for larger scale developments. The project-specific VMT reduction estimates of the selected TDM plan and implementation strategy shall be calculated. **MM-TRA-3.** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County Planning & Development Services staff shall review proposed projects to determine if new development within Alpine shall be required to implement the following Active Transportation Improvements to reduce VMT levels: • LUT-9 Improve Design of Development - Maximum VMT Reduction 21.3% and minimum reduction of 3%.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Grouped categories that go along with LUT-9 o SDT-5: Incorporate Bike Lane Street Design o SDT-6: Provide Bike Parking in Non-Residential Projects o SDT-7: Provide Bike Parking with Multi-Unit Residential Projects o SDT-9: Dedicate Land for Bike Trails • SDT-1: Provide Pedestrian Network Improvements – Maximum VMT Reduction 2% • SDT-2: Provide Traffic Calming Measures - Maximum VMT Reduction 1% **Tra-1.3:** Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context. **Tra-1.4:** Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified **Tra-1.6:** Develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program.	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Tra-3.1: Coordinate with SANDAG to obtain funding for operational improvements to State highways and freeways in the unincorporated area. Implement 2011 General Plan Update PEIR mitigation measures Tra-1.1 and Tra-1.7 as described above.	
	Impacts C-TRA-2: Exceed VMT Thresholds. The proposed projects cumulative VMT would exceed the San Diego region thresholds.	PS	Implement 2011 General Plan Update PEIR mitigation measures Tra-1.1, Tra-1.3, Tra-1.4, Tra-1.6, Tra-1.7, and Tra-3.1, and Alpine CPU mitigation measures MM-TRA-2 and MM-TRA-3, as described above.	SU
Substantially Increase Hazards due to a Design Feature	**Impact TRA-3: Substantially Increase Hazards Due to a Design Feature.** The proposed project would increase hazards due to incompatible uses.	PS	Implement 2011 General Plan Update PEIR mitigation measures Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1 as described above.	SU
	Impact C-TRA-3: Conflict with existing circulation system policies. The proposed project would contribute to a significant cumulative roadway safety impact.	PS	Implement 2011 General Plan Update PEIR mitigation measures Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1 as described above.	SU
Result in Inadequate Emergency Access	No New or More Severe Impacts than Previously Identified in the 2011 General Plan Update PEIR	LS	**Tra-4.2:** Implement the Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress. **Tra-4.3:** Implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection to evaluate adverse environmental effects of projects. Require fire protection plans to ensure the requirements of the County Fire Code and other applicable regulations are being met.	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards Implement 2011 General Plan Update PEIR mitigation measures Tra-1.3, Tra-1.4, Tra-1.6, and Tra-4.1.	
2.15 Utilities				
Project Impacts				
New or Expanded Utility Facilities	**Impact-UTIL-1: Require New or Expanded Utility Facilities Resulting in Environmental Impacts.** Because the proposed project would allow for a greater number of housing units requiring utility service connections compared to the 2011 General Plan and FCI GPA, the proposed project would result in new or more severe impacts than those identified in the prior EIRs.	PS	**USS-2.1:** Revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated village regional category. This is intended to limit unexpected demands for new water and wastewater facilities. **USS-2.2:** Perform CEQA review on privately initiated water and wastewater facilities and review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans. **USS-2.3:** Implement, and revise as necessary, the Green Building Program to encourage project designs that incorporate water conservation measures, thereby reducing the potential demand for new water purveyors with the buildout of General Plan Update. **USS-3.1:** Amend the Subdivision Ordinance to add additional design requirements for subdivisions that encourage conservation-oriented design. Also amend it to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, pathway/trail and recreation/open space networks. This will reduce	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			scattered development footprints and increase pervious surfaces in site design, thereby minimizing the need for new stormwater drainage facilities. **USS-3.2:** Prepare Subdivision Design Guidelines that establish a process to identify significant resources on a project site, identify the best areas or development and create a conservation-oriented design for both the project and open space areas. **USS-3.3:** Use the County Guidelines for Determining Significance for Surface Water Quality and Hydrology to identify adverse environmental effects on water quality. **USS-3.4:** Implement the LID handbook and establish LID standards for new development to minimize runoff and maximize infiltration. **USS-3.5:** Evaluate the environmental effects of all proposed stormwater drainage facilities and ensure that significant adverse effects are minimized and mitigated. **USS-8.1:** Implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources. **USS-8.2:** Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County funded renovation and new building projects. Also revise Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Design (LEED) standards or other Green Building rating systems. **USS-8.3:** Revise Board Policy G-16 to require the County to: • Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability • Require government contractors to use low emission construction vehicles and equipment.	
	Impact-C-UTIL-1: Result in a Cumulatively Considerable Contribution to Impacts from New or Expanded Utility Facilities. Future development associated with the proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects, resulting in a more severe impact. Although implementation of the General Plan policies and prior EIRs mitigation measures would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance because the specific details of future utility infrastructure projects are not currently known, and the relocation or	PS	Implement 2011 General Plan Update PEIR Mitigation Measures USS-2.1 through USS-2.3, USS-3.1 through USS-3.5, and USS-8.1 through USS-8.3.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	construction of new or expanded utilities is under the purview of utility providers and agencies, not the County. Therefore, the proposed project's contribution to cumulative impacts associated with new or expanded utilities would be more severe than the contribution identified in the prior EIRs and would be a potentially significant cumulative impact.			
Adequate Water Supplies	**Impact-UTIL-2: Lack Adequate Water Supply.** Because shortages have been identified in Padre Dam Municipal Water District's 2015 UWMP, and buildout of the proposed project would further increase the demand for potable water from the district from what was anticipated in the 2011 General Plan and FCI GPA, impacts on water supplies would be more severe than those identified in the prior EIRs and would be potentially significant.	PS	**USS-4.1:** Review General Plan Amendments for consistency with the goals and policies of the General Plan. This shall include designating groundwater dependent areas with land use density/intensity that is consistent with the long-term sustainability of groundwater supplies; locating commercial, office, civic, and industrial development in villages, town centers or at transit nodes; and ensuring that adequate water supply is available for development projects that rely on imported water. **USS-4.2**: Implement, and revise as necessary, the County Green Building Program with incentives for development that is energy efficient and conserves resources, including both groundwater and imported water. **USS-4.3**: Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available. Also	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Implement and revise as necessary Board Policy G-15 to conserve water at County facilities. **USS-4.4**: Implement the Groundwater Ordinance to balance groundwater resources with new development and implement and revise as necessary the Watershed Ordinance to encourage the removal of invasive species to restore natural drainage systems, thereby improving water quality and surface water filtration. Also revise the Ordinance Relating to Water Efficient for Landscaping to further water conservation through the use of recycled water. **USS-4.5**: Use the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse environmental effects on groundwater resources. **USS-4.6**: Establish a water credits program between the County and the Borrego Water District to encourage an equitable allocation of water resources. **USS-4.7**: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs.	
	Impact-C-UTIL-2: Result in a Cumulatively Considerable Contribution to a Lack of Adequate Water Supply. The proposed project would increase density beyond what	PS	Implement 2011 General Plan Update PEIR Mitigation Measures USS-4.1 through USS-4.7.	SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	was anticipated in the prior EIRs, resulting in additional growth and development. Because this growth would not have been accounted for in the current water supply and demand projections of Padre Dam Municipal Water District's 2015 UWMP, the proposed project would further strain local water supplies. As such, the proposed project would result in a more severe impact on water supplies. Similar to cumulative projects, future projects associated with the proposed project that meet the definition of a water demand project, as defined in State CEQA Guidelines Section 15155, would be required to obtain a water supply assessment from Padre Dam Municipal Water District that demonstrates adequate water supplies are available. However, because Padre Dam Municipal Water District has potential to experience shortages under long-term scenarios, future development associated with the proposed project, when combined with cumulative growth and development within Padre Dam Municipal Water District's service boundary, could inhibit the agency's ability to meet water demand and further contribute to potential long-term water supply shortages. Therefore, the proposed project's			

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	contribution to this impact would be a potentially significant cumulative impact.			
Adequate Wastewater Treatment Capacity	**Impact-UTIL-3: Lack Adequate Wastewater Treatment Capacity.** Because the number of potential housing units would be greater under the proposed project, thereby increasing the amount of wastewater requiring treatment, potential impacts on wastewater treatment capacities would increase relative to those identified in the prior EIRs, and impacts would be significant. As such, the proposed project would cause a more severe significant impact on wastewater treatment capacities than those identified in the prior EIRs and impacts would be potentially significant.	PS	**USS-1.1:** Participate in interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region. **USS-1.2:** Implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer/sanitation service for development projects that require it. Also revise Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities. **USS-1.3:** Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans.	LS
Sufficient Landfill Capacity	Less Severe Impact than Previously Identified in the 2011 General Plan Update PEIR. Sufficient landfill capacity is available to serve the proposed project. In addition, future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations, including AB 341 and the County's Integrated Waste Management Plan.	LS	No Mitigation Measures are Required	LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Solid Waste Regulations or the Expansion of Existing Infrastructure	No New or More Severe Impacts than Previously Identified in the 2011 General Plan Update PEIR. Compliance with the noted regulations is mandatory; therefore, impacts would be similar to those in the prior EIRs.	LS	No Mitigation Measures are Required	LS

Notes: PS = Potentially significant; LS = Less than significant; NI = No Impact; SU = Significant and Unavoidable
Alpine CPU mitigation measures, beginning with "MM," are also listed in Chapter 6 of this SEIR. Prior EIR mitigation measures are included in Appendix B of this SEIR.

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION AND ENVIRONMENTAL SETTING

The County of San Diego (County) proposes a comprehensive update to the existing Alpine Community Plan (proposed project or Alpine CPU). This chapter includes a statement of project objectives, identifies the location and boundaries of the Alpine Community Plan Area (CPA), and describes the proposed project.

Community plans serve to implement the County's General Plan. Community plans refine and tailor the General Plan to address the critical issues and concerns that are unique to a community and are not reflected in the broader policies of the Land Use Element of the General Plan. The goals and policies found in community plans are designed to provide more precise guidance regarding the character, land uses, and densities within each community. Generally, these goals and policies are more limiting and restrictive than the county-wide goals and policies, consistent with State legislation for internal consistency.

The existing Community Plan was written more than 40 years ago (1979). In that time, Alpine has significantly changed and so to have the challenges and opportunities facing future growth and development. The Alpine CPU is needed to reflect updates to the General Plan and other County plans and programs, accommodate for population growth and demographic changes, and reflect the current community's vision for the future.

This Supplemental Environmental Impact Report (SEIR) analyzes and discloses the environmental impacts of the Alpine CPU. This SEIR tiers from the General Plan EIR (2011) and the Forest Conservation Initiative (FCI) General Plan Amendment EIR (2016) (referred to throughout the rest of this section as "prior EIRs"), and evaluates the changes in land use density and other project components in comparison to what was analyzed in these prior EIRs. However, topic areas of air quality, greenhouse gas, wildfire, and transportation and traffic do not tier off of both prior EIRs. These topic areas rely only on the 2011 General Plan EIR. See the topic area section for a baseline discussion. This SEIR is programmatic in nature in that it analyzes the reasonably foreseeable impacts of the proposed changes to the existing Community Plan. It should be noted that the Alpine CPU does not propose any specific development projects that would result in physical impacts on the environment. However, it is reasonably foreseeable that projects implemented after adoption of the Alpine CPU could result in physical impacts on the environment.

The Alpine CPU proposes changes to the land use designations within four of the seven areas of potential change known as subareas located within the Alpine CPA. The proposed land use designations aim to concentrate residential development adjacent to transit routes, community services, retail options and employment opportunities with the intent to reduce the length of vehicle trips. Specifically, the Alpine CPU proposes higher density uses closer to the Village, allows mixed use in the Village Core, and provides neighborhood commercial opportunities near established residential communities and freeway access. The full details of the changes are provided in Section 1.4 below.

1.1 Project Objectives

The California Environmental Quality Act (CEQA) requires that an EIR contain a "statement of the objectives sought by the proposed project." Under CEQA, a "clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision-makers in preparing findings or a statement of overriding considerations. The statement of

objectives should include the underlying fundamental purpose of the project" (State CEQA Guidelines Section 15124[b]).

The County has identified the following objectives for the proposed project:

1. Provide community-specific policies and establish development guidance in pursuit of the County's greenhouse gas emission reduction targets.
2. Ensure new development is planned and designed in a manner that protects Alpine's natural setting and unique community character.
3. Require new development and encourage existing development to minimize impacts to public safety and provide adequate defensibility from wildfires.
4. Promote sustainability by focusing growth where services and infrastructure exist or can be reasonably built.
5. Encourage compact, mixed use development to support a vital Village core and advance the County's goals to reduce Vehicle Miles Traveled (VMT).
6. Minimize the impacts from development on sensitive natural resources—such as Alpine Creek, Viejas Mountain, and Cleveland National Forest for the benefit of the community.
7. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
8. Reinforce the vitality, local economy, and character of Alpine while balancing housing, employment, and recreational opportunities.

1.2 Project Location

Alpine is an unincorporated community in the eastern portion of San Diego County, approximately 25 miles east of downtown San Diego (Figure 1-1). The Alpine CPA covers approximately 68,100 acres of land characterized by diverse geography, residential land use patterns, and an established village area. The most distinguished geographic features are the rugged peaks of the Viejas and El Cajon Mountains near El Capitan Reservoir in the northern portion of the community as well as the hills and valleys around Loveland Reservoir in the southern portion. The Alpine CPA is bisected by Interstate 8 (I-8), with the majority of the population concentrated in and around the Alpine Village, which is adjacent to the freeway and includes residential and commercial centers. Cleveland National Forest comprises most of the land in the eastern and northern portions of the Alpine CPA.

The Alpine CPA is bordered by the Central Mountain CPA to the north, the Descanso and Pine Valley CPAs to the east, the Jamul-Dulzura CPA to the south, and the Lakeside and Crest-Dehesa-Harbison Canyon-Granite Hills CPAs to the west (Figure 1-2). The Alpine CPA includes the suburban Glen Oaks neighborhood in the western portion and the Viejas Mountains, El Cajon Mountains, and Cleveland National Forest in the eastern portion. The elevation of the terrain ranges from approximately 1,500 feet above mean sea level (amsl) at the vegetated drainages to more than 4,100 feet amsl in the semi-arid hilly terrain of the Viejas and El Cajon Mountains.

Alpine Village, located in the north-central portion of the Alpine CPA, is the most densely populated community within the planning area (Figure 1-3). Local development on both sides of I-8 consists primarily of residential/rural-residential, commercial, industrial, and mixed uses. The planning area also includes the communities of Peutz Valley, Japatul Valley, Hidden Glen, Dunbar Lane, and Galloway Valley.

Development within these communities consists of rural-residential and light agricultural uses. The Viejas Indian Reservation and Capitan Grande Reservation are also within the boundaries of the Alpine CPA; however, they are not under the County's jurisdiction.

1.3 Project Background

On August 3, 2011, the County of San Diego Board of Supervisors (Board) adopted the current General Plan. The Board also certified the General Plan EIR (County of San Diego 2011a, 2011b). The 2011 General Plan EIR provided an analysis of potential future development throughout the unincorporated County at a programmatic level. As part of that General Plan update process, the land use maps were updated for each of the communities in the County, which were then incorporated into the respective community plans.

The land use map changes that occurred with the adoption of the General Plan excluded approximately 71,300 acres of private lands within the Cleveland National Forest in the unincorporated County area that had been designated under the FCI. The FCI was a voter-approved initiative in 1993 that required a minimum lot size of 40 acres for private lands near the Cleveland National Forest, including land in the Alpine community. Upon its expiration on December 31, 2010, the former FCI lands reverted to the land use designations of the 1978 General Plan, which was in place when the FCI originally took effect.

To address this inconsistency, the County prepared a supplemental EIR that analyzed the re-designation of the former FCI lands consistent with the Guiding Principles and Goals and Policies of the adopted 2011 General Plan, as well as changes in the land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure consistency between the new land uses. Included in this analysis were land use changes to approximately 13,748 acres of former FCI lands within the Alpine CPA. On December 14, 2016, the Board approved the FCI Project, and certified the associated EIR (FCI EIR). With the approval of the FCI Project, the land use map in the General Plan and all Community Plans that had FCI lands (including the Alpine Community Plan) were updated to incorporate the land use changes of the former FCI lands.

According to CEQA Guidelines Section 15150, an EIR may incorporate by reference all or portions of another document which is available to the public by only mentioning the document by reference. This SEIR incorporates by reference each of the following documents.

- General Plan EIR (August 2011)
- FCI EIR (October 2016)

Before drafting the Alpine CPU, the existing demographic, land use, and housing conditions of Alpine were analyzed. More information on this process can be found within Chapter 2 of the Background Report prepared for the project (County 2020). Alpine experienced considerable growth over the last four decades relative to its size. Since 1980, Alpine's population has tripled from 5,368 to 18,095. The San Diego Association of Governments (SANDAG) provides growth projections for the Alpine CPA for the years 2020, 2035, and 2050 (SANDAG 2013). For the years 2020 and 2035, SANDAG projects a total population of 18,210 and 22,044, respectively. By 2050, SANDAG projects a total population of 23,841.

Based on the existing allowable density under the current General Plan using SANDAG's Series 13 model, the potential population within the seven subareas should be approximately 11,341 people. The proposed project could result in a population of approximately 5,616 people over what is anticipated in the current General Plan or a potential total of 16,957 people within the seven subareas.

A range of draft land use concepts were developed for further analysis and presented to the public for feedback. (Figures 1-4a and 1-4b). Six alternatives for implementing land use changes reflecting different community viewpoints were considered. One of the alternatives were chosen as the proposed project, and five are evaluated as project alternatives in this SEIR.

The proposed project and each of the five alternatives propose varying land use designation changes for the different subareas. The proposed project analyzed within this SEIR includes the Village-Focused land use designations, which are described below in Section 1.4, Project Description. The five alternatives include the Former FCI Lands in Alpine alternative, Former FCI Lands in Eastern Alpine alternative, Low alternative, Moderate alternative, and High alternative. These five alternatives are analyzed in Chapter 4, Alternatives, of this SEIR. The results of the alternatives are summarized below in Section 1.4.2 Proposed Land Use Changes.

1.4 Project Description

The proposed project consists of a comprehensive update to the existing Alpine Community Plan. Specifically, the proposed project would update and refine the current community plan's goals and policies to reflect the character of Alpine and guide future growth and development within the community, as well as change land use designations within four of the seven subareas identified within the Alpine CPA. These land use changes could result in increased density and intensity in the CPA compared to the existing land use map in the current Alpine Community Plan and General Plan. The Alpine CPU provides guidance and opportunities for future growth within Alpine but does not mandate any development. The land use changes proposed in the Alpine CPU concentrate local services and residential density in the more developed Village area where there are existing infrastructure and services. However, to accommodate growth associated with the buildout allowed by the proposed project, it is anticipated that new or expanded infrastructure would be required such as roads, water, wastewater treatment, stormwater drainage, electric power, natural gas, and/or telecommunications facilities.

In addition, new zoning designations will be adopted for the CPA consistent with the proposed land use designation changes. The proposed project also assumes a Transfer of Development Rights (TDR) pilot program may be implemented. The goals of the TDR program are to allow some residential dwelling unit entitlements to be transferred from areas that are desired for conservation (sending areas) to more compact locations near existing infrastructure areas (receiving areas). Sending areas may be comprised of areas where unbuilt units can be transferred out to support conservation efforts and reduce development near open space or forest interface areas. Receiving areas may be comprised of areas that can accommodate increased density and focus planned growth in proximity to services, infrastructure, or village areas in a compact manner to reduce VMT. The exact location for the sending and receiving areas will be defined by the TDR pilot program.

An Implementation Plan will be developed as part of the Final Alpine CPU, which will outline and prioritize potential future CPU-consistent projects and possible sources and financial mechanisms that would assist in the implementation of the Alpine CPU. For example, the Implementation Plan will outline the process for updating the Design Review Guidelines to reflect the community's vision to encourage development that contributes to Alpine's special character and identity as a mountain village.

1.4.1 Community Plan Elements

The adopted Alpine Community Plan was developed in conjunction with the General Plan to provide guidelines for land use decisions within the Alpine CPA. The proposed project would update and refine the adopted Community Plan's goals and policies to reflect the character of Alpine and guide growth and

development. However, these updates are consistent with the goals, policies, and planning concepts of the General Plan and all other applicable County plans and programs. The proposed Alpine CPU consists of six chapters: Land Use, Mobility, Conservation and Open Space, Housing, Safety, and Noise.

1.4.1.1 Land Use

The Land Use Element provides the community's land use framework including the General Plan's regional categories related to the Community Plan's land use designations, existing land uses, infrastructure, and public services. This element provides goals and policies to provide a balance of land uses, promoting economic opportunities and scenic travel routes, and preserving agricultural resources.

1.4.1.2 Mobility

The Mobility Element provides the community's mobility network including roads, transit, bike paths, and trails. Existing and planned roads are provided through a network map and matrix, which is an appendix to the Community Plan. Goals and policies are provided to support multi-modal transportation systems.

1.4.1.3 Conservation and Open Space

The Conservation and Open Space Element discusses open space and recreational resources that make Alpine unique and describes how these resources will be protected and maintained for their local and regional benefits. The goals and policies provided promote a balance of natural and man-made open space resources, as well promote a balance between connectivity for the community and wildlife.

1.4.1.4 Housing

The Housing Element discusses the current housing supply in Alpine, housing affordability, and senior housing. The goals and policies of the Housing Element promote a variety of housing types in all economic ranges; encouraging community involvement and keeping the rural character.

1.4.1.5 Safety

The Safety Element discusses natural and human-made hazards such as fire hazards, steep slopes, and flooding as well as the fire services and law enforcement resources in the Alpine community. The goals and policies of the Safety Element promote the establishment of emergency procedures and preventative measures to minimize hazards; and encourage improvements to the built environment to promote community safety.

1.4.1.6 Noise

The Noise Element explains how noise is measured and the generators of noise related to both transportation and non-transportation. The goals and policy of the Noise Element promote the minimization of noise in residential neighborhoods.

1.4.2 Proposed Land Use Changes

To develop a range of land use alternatives for consideration, a Visioning and Existing Conditions workshop was held where the community discussed future community needs and indicated preferred areas of change in the Alpine CPA. An opportunities and constraints analysis was also conducted that evaluated community factors such as the availability of community services, transit services, slope on parcels, travel time for emergency services, and known existing environmental resources (i.e., vegetation

communities, which can relate to biological resources or wildfire hazards). As a result of the community's input and staff analysis, five land use alternatives (Former FCI Lands in Eastern Alpine alternative, Former FCI Lands in Alpine alternative, Low alternative, Moderate alternative, and High alternative) with different densities and intensities were developed for six subareas within the Alpine CPA. Six subareas and the five alternatives were presented at the Planning Concepts workshop. After analysis was conducted on the five alternatives, public input was given on the five alternatives and the County settled a lawsuit, a seventh subarea was added (Former FCI land in Alpine) as well as the Village-Focused alternative. The Village-Focused land use designations were chosen for the Alpine Community Plan update and are analyzed as part of this SEIR.

The project proposes to re-designate some of the land use designations within four of the seven subareas of the Alpine CPA. No land use changes are proposed outside of the seven subareas. The proposed land use designations concentrate residential development adjacent to transit routes, community services, retail options and employment opportunities with an overall intent to reduce VMTs. Table 1-1 identifies the change in capacity that would result from the proposed land uses changes.

Table 1-1: Proposed Change to Development Capacity within the Subareas

Subarea	Existing General Plan Capacity	Proposed Alpine CPU Capacity	Change/ No Change	Change in Capacity
1	192 residential dwelling units (du)	192 residential du	No Change	Not applicable (N/A)
	0 acre of commercial use	0 acre of commercial use	No Change	N/A
	0 acre of mixed-use	0 acre of mixed use	No Change	N/A
	31.32 acres of industrial uses	31.32 acres of industrial uses	No Change	N/A
2	315 residential du	1,095 residential du	**Change**	**+780 du**
	0 acre of commercial use	1.02 acres of commercial use	**Change**	**+1.02 acre**
	0 acre of mixed-use	0 acre of mixed use	No Change	N/A
	0 acre of industrial use	0 acre of industrial use	No Change	N/A
3	31 residential du	31 residential du	No Change	N/A
	0 acre of commercial use	0 acre of commercial use	No Change	N/A
	0 acre of mixed use	0 acre of mixed use	No Change	N/A
	0 acre of industrial use	0 acre of industrial use	No Change	N/A

Subarea	Existing General Plan Capacity	Proposed Alpine CPU Capacity	Change/ No Change	Change in Capacity
4	166 residential du	851 residential du	**Change**	**+685 du[1]**
	0 acre of commercial use	4.19 acres of commercial use	**Change**	**+4.19 acres**
	0 acres of mixed-use	3.86 acres of mixed use	**Change**	**+3.86 acres**
	0 acre of industrial use	0 acre of industrial use	No Change	N/A
5	460 residential du	429 residential du	**Change**	**-31 du**
	7.02 acres of commercial use	10.96 acres of commercial use	**Change**	**+3.94 acres**
	0 acre of mixed use	0 acre of mixed use	No Change	N/A
	0 acre of industrial use	0 acre of industrial use	No Change	N/A
6	38 residential du	617 residential du	**Change**	**+579 du[2]**
	85.16 acres of commercial use	0 acre of commercial use	**Change**	**-85.16 acres**
	0 acre of mixed use	104.93 acres of mixed uses	**Change**	**+104.93 acres[3]**
	0 acre of industrial use	0 acre of industrial use	No Change	N/A
7	2,863 residential du	2,863 residential du	No Change	N/A
	116.2 acres of commercial use	116.2 acre of commercial use	No Change	N/A
	152.3 acres of mixed use	152.3 acres of mixed use	No Change	N/A
	0 acre of industrial use	0 acre of industrial use	No Change	N/A

[1]A portion of the residential dwelling units (116 du) identified for this subarea would be provided within the mixed use designation.
[2] All dwelling units proposed within Subarea 6 would be provided within the total acreage for the proposed mixed use designation.
[3] The existing 85.16 acres of commercial uses is proposed to be provided within the total acreage for the proposed mixed use designation.

The proposed land use changes would result in an increase in intensity, density, and the number of potential dwelling units that could be developed within the CPA. The potential dwelling units are further discussed in Section 1.4.3, Residential Yields Analysis. The existing and proposed land uses are depicted on Figures 1-5 through 1-11. Table 1-2 identifies the acreages of the existing and proposed land use designations within each subarea. For a complete description of the land use designations in Table 1-2, please refer to the General Plan, Chapter 3, Land Use Element. New zoning designations would also be adopted to ensure zoning classifications are consistent with the proposed General Plan land use designations.

Table 1-2. Acreages of Existing and Proposed Land Uses

Subarea Number and Name	Existing		Proposed	
	Land Use Designation	Acreage	Land Use Designation	Acreage
1 Northwest Village	Village Residential (VR-7.3)	26.39	Village Residential (VR-7.3)	26.39
	Limited Impact Industrial (I-1)	31.32	Limited Impact Industrial (I-1)	31.32
2 Tavern Road	Village Residential (VR-4.3)	60.88	Village Residential (VR-10.9)	107.15
	Village Residential (VR-2.9)	50.95	Village Residential (VR-7.3)	34.43
	Village Residential (VR-2)	30.75	Neighborhood Commercial (C-3)	1.02
	Semi-Rural Residential	.02		
3 Otto Avenue	Semi-Rural Residential (SR-1)	114.22	Semi-Rural Residential (SR-1)	114.22
4 Northwest Community Plan Area	Village Residential (VR-2)	12.32	Neighborhood Commercial (C-3)	4.19
	Semi-Rural Residential (SR-1)	222.40	Village Core Mixed Use (C-5)	3.86
	Semi-Rural Residential (SR-2)	417.38	Semi-Rural Residential (SR-0.5)	644.07
5 Eastern Alpine	Village Residential (VR-2)	286.66	Village Residential (VR-2)	290.07
	Semi-Rural Residential (SR-4)	903.50	Semi-Rural Residential (SR-1)	33.38
	Rural Lands (RL-40)	602.38	Semi-Rural Residential (SR-4)	330.66
	Rural Commercial (C-4)	7.02	Semi-Rural Residential (S-10)	84.04
	Public Agency Lands	280.96	Rural Lands (RL-20)	179.06
			Rural Lands (RL-40)	871.40
			General Commercial (C-1)	7.34
			Rural Commercial (C-4)	3.62
			Public Agency Lands	280.96
6 Alpine Village	Village Residential (VR-15)	14.13	Village Core Mixed Use (C-5)	104.93
	Semi-Rural Residential (SR-1)	0.87		
	General Commercial (C-1)	64.37		
	Rural Commercial (C-4)	20.79		
	Public/Semi-Public Facilities (P/SP)	4.77		
7 Former FCI Lands	Semi-Rural Residential (SR-1)	106.70	Semi-Rural Residential (SR-1)	106.70
	Semi-Rural Residential (SR-2)	1074.64	Semi-Rural Residential (SR-2)	1074.64
	Semi-Rural Residential (SR-4)	550.22	Semi-Rural Residential (SR-4)	550.22
	Semi-Rural Residential (SR-10)	1511.55	Semi-Rural Residential (SR-10)	1511.55
	Rural Lands (RL-20)	3691.94	Rural Lands (RL-20)	3691.94
	Rural Lands (RL-40)	4680.28	Rural Lands (RL-40)	4680.28
	Rural Lands (RL-80)	75.40	Rural Lands (RL-80)	75.40
	Rural Commercial (RC)	116.20	Rural Commercial (C-4)	116.20
	Public/Semi-Public Facilities (P/SP)	38.95	Public/Semi-Public Facilities (P/SP)	38.95
	Tribal Lands (TL)	61.12	Tribal Lands (TL)	61.12
	Village Core Mixed Use (C-5)	152.31	Village Core Mixed Use (C-5)	152.31
	Total[1]	**15,211.39**	**Total[1]**	**15,211.42**

[1] Totals may not sum exactly due to rounding.

1.4.3 Residential Yield Analysis

To determine the number of dwelling units that could be developed under the proposed project, a residential yields analysis was completed. First, parcels that would experience land use changes were entered into a database along with their Assessor Parcel Numbers, General Plan designations, and proposed Alpine CPU designations. The parcels were then grouped into polygons based on their land use designations and processed through a geographic information system- (GIS-) based application that constrained potential yield based on the presence of built lands, rural lands, floodplains, wetlands, public lands, future roads, habitat preserve, Alquist-Priolo fault zones, airport noise, airport hazard zones, steep slope, habitat tier 1 and 2, and Pre-approved Mitigation Areas. To be conservative, the County Groundwater Ordinance was removed as a constraint, which allowed for the maximum expected yield to be calculated under the assumption that water could be provided to the subareas either by extending the County Water Authority/Padre Dam Municipal Water District boundary or through potential financing options detailed in the Implementation Plan. Table 1-3 provides a comparison of the number of potential dwelling units that could be developed under the existing General Plan and the proposed Alpine CPU.

Table 1-3. Comparison of Potential Housing Units

	Subarea	Current General Plan	Proposed Alpine CPU	Net Change
1	Northwest Village	192	192	0
2	Tavern Road and Wright's Field	315	1,095	780
3	Otto Avenue	31	31	0
4	Northwest Community Plan Area	166	851	685
5	Eastern Alpine	460	429	-31
6	Alpine Village	38	617	579
7	Former FCI Lands	2,863	2,863	0
	Total	**4,065**	**6,078**	**2,013**

As shown in Table 1-3, within the seven subareas 4,065 potential dwelling units could be developed under the General Plan, while 6,078 potential dwelling units could be developed under the proposed project.

Outside of the seven subareas, the maximum residential development potential is 2,365 for both the General Plan and the Alpine CPU. The density outside of the seven subareas is part of the existing baseline and General Plan and would remain unchanged as part of the proposed project.

1.4.4 Proposed Mobility Network Changes

In addition to the proposed land use changes described in Section 1.4.2, there are several proposed changes to the Mobility Element including roadway re-classifications, roadway re-configurations, and the removal and addition of roadway segments. These proposed changes are identified below in Table 1-4. As shown in Table 1-4, four roadway segments are proposed to be removed from the existing Mobility Element Network: New Road 14 (from Tavern Road to West Victoria Drive), New Road 18 (from Alpine Boulevard to Eltinge Drive), New Road 23 (from Victoria Circle to East Victoria Drive), and El Monte Road (from Lakeside community boundary to El Capitan Reservoir). One new roadway segment is proposed,

Table 1-4. Proposed Mobility Network Changes

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
1	**Old Highway 80 (SC1930)** Lakeside Community Boundary to Chocolate Summit Drive	**2.2~~C~~B Light Collector** ~~Continuous~~ Intermittent Turn Lane~~s~~	19,000	19,000	None
2	**Chocolate Summit Drive (SC1930)/ Broad Oaks Road** Old Highway 80 to Lakeside Community Boundary	~~**2.2E Light Collector**~~ **2.3B Minor Collector** Intermittent Turn Lane – Old Highway 80 to Chocolate Creek Road	16,200	9,000	None
		2.3C Minor Collector No Median – Chocolate Creek Road to Lakeside Community Boundary	8,000	8,000	
3	**Alpine Boulevard (SF1402)/ (SC1883):** Dunbar Lane to East Willows Road	~~**4.1B Major Road** Intermittent Turn Lanes - Dunbar Lane to Arnold Way~~	34,200	19,000	**Accepted at LOS E/F** ~~Boulder Road to Louise Drive~~ Tavern Road to East Willows Road
		2.1C~~D~~ Community Collector ~~Improvement Options (Raised Median)~~ Intermittent Left Turn Lane – ~~Arnold Way~~ Dunbar Lane to Tavern Road	19,000	19,000	**Shoulder as Parking Lane** Separate Bike Lane Required Tavern Road to South Grade Road

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
		2.2B~~A~~ Light Collector ~~Raised Median/~~ Continuous Turn Lane – Tavern Road to South Grade Road	19,000	19,000	
		2.1C~~D~~ Community Collector ~~Improvement Options~~ (Intermittent Turn Lane~~s~~) – South Grade Road to ~~West~~ East Willows Road	19,000	19,000	
		~~**2.1C Community Collector**~~ ~~West Willows Road to East Willows Road~~			
4	**Harbison Canyon Road (SF1402):** Arnold Way to Crest/Dehesa Community Boundary	~~**2.2A Light Collector**~~ ~~Raised Median – Arnold Way to Bridle Run~~	N/A	N/A	None
		~~**2.2C Light Collector**~~ ~~Intermittent Turn Lanes – Bridle Run to Crest/Dehesa Community Boundary~~			
		2.1C Community Collector Intermittent Turn Lane	19,000	19,000	

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
5	**Arnold Way (SC1971):** Alpine Boulevard (western end near Harbison Canyon Road) to Alpine Boulevard (near West Victoria Drive)	~~**2.2C Light Collector**~~ **2.1C Community Collector** Intermittent Turn Lane~~s~~ – Alpine Boulevard (western end) to South Grade Road **2.2F Light Collector** Reduced Shoulder – South Grade Road to Foss Road **2.2C Light Collector** Intermittent Turn Lane~~s~~ – Foss Road to Tavern Road ~~**2.2A Light Collector**~~ **2.2C Light Collector** ~~Raised Median/ Continuous~~ Intermittent Turn Lane – Tavern Road to Alpine Boulevard (near West Victoria Drive)	19,000 19,000	19,000 19,000	**Improvement Option** South Grade Road to Foss Road – Reduce shoulder width to six feet for use as a bike lane (requires parking prohibition) Tavern Road to Alpine Boulevard ~~Combined Raised Median and Continuous Turn Land,~~ Intermittent and continuous two-way left turn, as appropriate **Shoulder as Parking Lane** Separate bike lane required – Tavern Road to Alpine Boulevard
6	**Foss Road** Arnold Way to South Grade Road	**2.2E Light Collector** No Median	16,200	16,200	None
7	**South Grade Road (SA370)** Arnold Way to Alpine Boulevard	**2.2E Light Collector** No Median – Arnold Way to ~~Via Viejas~~ Tavern Road	16,200	16,200	None

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
		2.2C Light Collector Intermittent Turn Lane~~s~~ – ~~Via Viejas~~ Tavern Road to Alpine Boulevard	16,200[1] 19,000[2]	19,000[1] 19,000[2]	
8	**Tavern Road (SA380)** ~~New Road 11~~ Victoria Park Terrace to Japatul Road	~~**4.1A Major Road** Continuous Turn Lane – New Road 11 to Arnold Way~~	N/A[3]	N/A[3]	None ~~Caltrans Facilities Programing Improvements (widening) of the Interstate 8 overpass is not programmed in the 2030 RTP (Reasonably Expected Revenue scenario)~~
		2.2D Light Collector Improvement Options (~~Raised Median~~ Passing Lane) – ~~Arnold Way~~ Victoria Park Terrace to South Grade Road	37,000[4] 19,000[5]	19,000[4] 19,000[5]	
		2.2E Light Collector No Median – South Grade Road to Japatul Road	16,200	16,200	
9	**Dehesa Road (SF1401)** Crest-Dehesa Community Boundary to Tavern Road	**2.2E Light Collector** No Median	16,200	16,200	None
10	**Japatul Road (SF1401.1)** Tavern Road to Japatul Valley Road	**2.2F Light Collector** Reduced Shoulder	9,700	9,700	None ~~Improvement Option Reduce shoulder width to six feet for use as a bike lane (requiring parking prohibition)~~

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
11	**New Road 11** Victoria Park Terrace to Tavern ~~Lane~~ Road	~~**2.3A Minor Collector**~~ ~~Raised Median~~ **2.2E Light Collector** No Median	9,000	16,200	None
12	~~**West Willows Road**~~ ~~Willows Road to Alpine Boulevard~~ **Tavern Road** New Road 11 to Victoria Park Terrace	~~**2.2E Light Collector**~~ ~~Raised Median~~ **2.1A Community Collector** Raised Median	37,000[6]	19,000[6]	None
13	**Victoria Park Terrace (SC1985)** Tavern Road (at Tavern Lane) to West Victoria Drive	~~**2.2A Light Collector**~~ ~~Raised Median~~ **2.1D Community Collector** Improvement Option (Passing Lane)	19,000	19,000	None
~~14~~*	~~**New Road 14**~~ ~~Tavern Road (at Tavern Lane) to West Victoria Drive~~	~~**Local Public Road**~~	~~---~~	~~---~~	~~None~~
15	**West Victoria Drive (SC1990)** Alpine Boulevard to Victoria Park Terrace	**2.2E Light Collector** No Median	16,200	16,200	**Shoulder as Parking Lane** Separate bike lane required – Interstate 8 to Alpine Boulevard
16	**North/East Victoria Drive (SC1990)** Victoria Park Terrace to South Grade Road	**2.2D~~F~~ Light Collector** ~~Reduced Shoulder – Victoria Park Terrace to Otto Avenue~~	9,700	19,000	None ~~Victoria Park Terrace to Otto Avenue – Reduce shoulder width to six feet for use as a bike lane~~

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
		~~**2.2C Light Collector** Intermittent Turn Lanes – Otto Avenue to South Grade Road~~			~~(requires parking prohibition)~~
17	**Otto Avenue** East Victoria Road to ~~West~~ Willows Road	**2.2E~~C~~ Light Collector** ~~Intermittent Turn Lanes~~ No Median	19,000	16,200	None
~~18*~~	~~**New Road 18** Alpine Boulevard at West Victoria Drive to Eltinge Drive at Marshall Road~~	~~**Local Public Road**~~	~~---~~	~~---~~	~~None~~
19	**Willows Road (SC2000)** Otto Avenue to ~~Alpine Boulevard~~ Willows Road Interchange	**2.2E Light Collector** No Median – Otto Avenue~~/West Willows Road~~ to Viejas Casino Area	16,200	16,200	**Accepted at LOS F** ~~Alpine Boulevard to Viejas Grade~~ Otto Avenue to Viejas Casino Area
		4.2A Boulevard Raised Median – Viejas Casino Area ~~east to I-8 Westbound On-ramp (Exit 36)~~	30,000	30,000	
		~~**4.1A Major Road** Raised Median – I-8 Westbound On-ramp at Willows Road to Alpine Boulevard~~	30,000	16,200	
		2.2E Light Collector No Median – Viejas Casino Area to East Willows Road Interchange			

ID	Road Segment	Existing Designation/ Improvement	Existing Capacity	Proposed Capacity	Special Circumstances
20	**Japatul Valley Road (SF1401.1)** Japatul Road to Central Mountain Subregional Boundary	**2.2F Light Collector** Reduced Shoulder	9,700	9,700	None ~~Improvement Option~~ ~~Reduce shoulder width to six feet for use as a bike lane (requires parking prohibition)~~
21	**Lyons Valley Road (SA390)** Japatul Road to Jamul/Dulzura Subregional Boundary	**2.2F Light Collector** Reduced Shoulder	9,700	9,700	None ~~Improvement Option~~ ~~Reduce shoulder width to six feet for use as a bike lane (requires parking prohibition)~~
22	**Viejas View Place** Alpine Boulevard to South Grade Road	~~**Local Public Road**~~ **2.3C Minor Collector** No Median	N/A	8,000	None
~~23*~~	~~**New Road 23**~~ ~~Victoria Circle to East Victoria Drive~~	~~**Local Public Road**~~	~~—~~	~~—~~	~~None~~
~~24*~~	~~**El Monte Road (SC1920)**~~ ~~Lakeside Community Boundary to El Capitan Reservoir~~	~~**2.3C Minor Collector**~~	~~—~~	~~—~~	~~None~~
26**	**New Road 26** Alpine Boulevard to Via Dieguenos via Viejas Creek Trail	**2.3C Minor Collector** No Median	N/A	8,000	None

[1] Represents the capacity for the portion of South Grade Road from Via Viejas to Tavern Road.
[2] Represents the capacity for the portion of South Grade Road from Tavern Road to Alpine Boulevard.
[3] Represents the capacity for the portion of Tavern Road from New Road 11 to Victoria Park Terrace; which is proposed to be moved from ME ID 8 to ME ID 12. The capacity for this segment of Tavern Road is shown under ME ID 12.
[4] Represents the capacity for the portion of Tavern Road from New Road 11 to Victoria Park Terrace to Arnold Way.

[5] Represents the capacity for the portion of Tavern Road from Arnold Way to South Grade Road.
[6] The proposed changes are associated with ME ID 8 for Tavern Road from New Road 11 to Victoria Park Terrace, reducing the classification from a 4.1A Major Road to a 2.1A Community Collector.
* Road segment/improvement proposed to be deleted.
**New road segments/improvements proposed to be added.
N/A = Not Applicable.

New Road 26, to provide secondary access to Palo Verde Estates; which currently only has one ingress and egress. New Road 26 would be located within Subarea 5, along Viejas Creek Trail, from Alpine Boulevard to Via Dieguenos. Figures 1-12a and 1-12b depicts the proposed changes to the Mobility Element Network.

1.5 Technical, Economic, and Environmental Characteristics

As previously discussed, the proposed project consists of a comprehensive update to the existing Alpine Community Plan. Specifically, the proposed project would update and refine the current Community Plan's goals and policies to reflect the character of Alpine and guide future growth and development within the community. Land use and mobility maps will be updated with revised land use designations and zoning within four of the seven identified subareas throughout the Alpine CPA. Fundamental to the re-designation of land uses proposed under the Alpine CPU is the consistency of proposed re-designations with the Guiding Principles and Policies of the General and Community Plan. As stated in the 2011 General Plan EIR, "[c]entral to the land use concept for unincorporated San Diego County is a development pattern that balances the land requirements of residential growth with those of commerce, agriculture, recreation, and wildlife habitats. This development pattern directs future growth to areas where existing or planned infrastructure and services can support growth and to locations within or adjacent to existing communities" (County 2011b). This SEIR considers this fundamental concept in evaluating the potential environmental effects of the proposed project.

1.6 Environmental Setting

According to Section 15125 of the State CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of the proposed project to provide the "baseline condition" against which project-related impacts are compared. Normally, the baseline condition is the physical condition that exists when the Notice of Preparation (NOP) is published. The NOP for the proposed project was published on August 30, 2018. However, this SEIR is tiering from the 2011 General Plan EIR and FCI EIR.[1] As such, the baseline conditions for the proposed project are the physical conditions described in each of these EIRs, which are incorporated by reference. In some instances, however, the baseline conditions have been updated for certain environmental issue areas, including aesthetics (Section 2.1), air quality (Section 2.3), Greenhouse gas emissions (Section 2.6), transportation and traffic (Section 2.14), and wildfire (Section 2.7) to reflect any changes in circumstances that have occurred since the certification of the 2011 General Plan EIR and FCI EIR. These changes in circumstances, which could include new regulations or substantial physical changes that have occurred within the Alpine CPA, would need to be considered to accurately determine the proposed project's potential effects on the environment.

1.7 Purpose and Intended Uses of the EIR

The County is the lead agency, as defined in State CEQA Guidelines Section 15050, because it has principal responsibility for approving the proposed Alpine CPU. As the lead agency, the County also has primary responsibility for complying with CEQA. As such, the County has analyzed the environmental effects of the proposed project, the results of which are presented in this SEIR. The Board, in its role as the decision-making body of the County, is responsible for certifying the Final SEIR and adopting the Findings of Fact and Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines prior to project approval.

[1] Due to prior litigation and a settlement agreement, this SEIR does not rely on the FCI Lands GPA SEIR for air quality, greenhouse gas emissions, transportation and traffic, and wildfire.

1.7.1 Supplemental EIR

Consistent with State CEQA Guidelines Section 15163(a)(2), the County has prepared an SEIR to the 2011 General Plan EIR and FCI EIR since only minor additions or changes would be necessary to make the previous EIRs adequately apply to the proposed Alpine CPU. Section 15163 also states:

(b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

(c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.

(d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.

(e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

The 2011 General Plan EIR provided an analysis of potential impacts associated with future development within the unincorporated County based on anticipated buildout of the General Plan and other relevant plans, programs, and policies. In addition, the FCI EIR analyzed the re-designation of the former FCI lands consistent with the Guiding Principles and Goals and Policies of the adopted General Plan, including land use changes to approximately 13,748 acres of former FCI lands within the Alpine CPA.

Hard copies of the 2011 General Plan EIR and FCI EIR are available for review at the County of San Diego, Planning & Development Services, located at 5510 Overland Avenue, San Diego, California 92123. In accordance with State CEQA Guidelines Section 15150, information from the 2011 General Plan EIR and FCI EIR are hereby incorporated by reference into this SEIR and are available online at:

http://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html.

1.7.2 Level of Analysis

The degree of specificity in an EIR corresponds to the degree of specificity in the underlying activity described in the EIR. As CEQA specifies, a Program EIR is appropriate for a Community Plan under which there will be future development proposals that are 1) related geographically, 2) logical parts in a chain of contemplated actions, 3) connected as part of a continuing program, and 4) carried out under the same authorizing statute or regulatory authority and have similar environmental impacts that can be mitigated in similar ways (CEQA Guidelines Section 15168).

For some site-specific purposes, a program-level environmental document may provide sufficient detail to enable an agency to make informed site-specific decisions within the program. This approach would allow agencies the ability to consider program-wide mitigation measures and cumulative impacts that might be slighted in a case-by-case analysis approach, and to carry out an entire program without having to prepare additional site-specific environmental documents. In other cases, the formulation of site-specific issues is unknown until subsequent design occurs leading to the preparation of later project-level environmental documentation.

Preparation of a program-level document simplifies the task of preparing subsequent project-level environmental documents for future projects under the Alpine CPU for which the details are currently unknown. This SEIR presents an analysis of the environmental impacts of adoption and implementation

of the Alpine CPU. Specifically, it evaluates the physical and land use changes from potential development that could occur with adoption and implementation of the Alpine CPU.

Similar to the 2011 General Plan EIR, the buildout scenario as it pertains to the Alpine CPU is based on the maximum development potential of the proposed land use designations within the CPA, taking into account the specific constraints identified in Section 1.4.3, Residential Yields Analysis. As discussed in Section 1.6, Environmental Setting, the baseline conditions for the proposed project are generally the physical conditions described in the 2011 General Plan EIR and FCI EIR. However, the baseline conditions have been updated in some instances to reflect any changes in circumstances that have occurred since the certification of these EIRs. The proposed Alpine CPU would guide growth within the community over a 30-year planning horizon; as such, 2050 is assumed as the buildout year for purposes of this SEIR.

1.7.3 Streamlining and Tiering

The County intends to use the streamlining/tiering provisions of CEQA to the maximum feasible extent, so that future environmental review of specific projects is undertaken expeditiously without the need for repetition and redundancy, as provided in CEQA Guidelines Section 15152 and elsewhere.

Specifically, pursuant to CEQA Guidelines Section 15183, streamlined environmental review is mandated for projects that are consistent with the development density established by the community plan or general plan for which an EIR was certified, unless such a project would have environmental impacts peculiar to the project or the project site. For projects that are consistent, no additional environmental review is required except to determine whether there are any project-specific significant effects that are peculiar to the project or project site. The County intends to use this SEIR to streamline future publicly- and privately-initiated projects within the Alpine CPA that are consistent with the proposed project.

Likewise, Public Resources Code Section 21094.5 and CEQA Guidelines Section 15183.3 also provides for streamlining of certain qualified, infill projects.

This SEIR is intended to provide for the streamlined environmental review necessary for subsequent consideration of project-level approvals required for the following individual project types:

- Development projects consistent with the intensities and types of uses fully contemplated in the Community Plan;
- Improvements to public infrastructure systems (i.e., water, sewer and storm drains, electrical and power utilities, etc.);
- Improvements to the public roadway and transportation systems, including roadway and sidewalk repairs and improvements, new bike lanes, and other similar transportation improvements specifically contemplated in the Alpine CPU; or
- Development of public parks and open space, or private and semi-public open spaces (i.e., community gardens, etc.) as specifically contemplated in the Alpine CPU.

When considering the applicability of these streamlining provisions under CEQA, the County shall consider whether such subsequent projects may have impacts which are peculiar to the project or its site, whether the project may result in impacts which were not fully analyzed in this SEIR, or which may result in impacts that are more severe than have been identified in this SEIR.

In addition, CEQA Guidelines sections 15162-15164 allow for the preparation of a Subsequent (Mitigated) Negative Declaration, Subsequent or Supplemental, and/or Addendum, respectively, to a certified EIR

when certain conditions are satisfied. Moreover, California Government Code Section 65457 and CEQA Guidelines Section 15182 provide that once an EIR is certified and a specific plan adopted, any residential development project, including any subdivision or zoning change that implements and is consistent with the specific plan is generally exempt from additional CEQA review under certain circumstances. The above are merely examples of possible streamlining/tiering mechanisms that the County may pursue and in no way limit future environmental review of specific projects.

1.8 Impact Analysis Methodology

The methodology for analyzing potential environmental impacts of the proposed project is generally similar to that of the General Plan. Specifically, the programmatic-level analysis contained in this SEIR does not speculate on the individual environmental impacts of potential future development projects on lands re-designated under the proposed Alpine CPU.

The potential for significant impacts to occur from future development associated with the proposed Alpine CPU is based on specific technical analyses as well as GIS data and spatial analysis. Additionally, federal, state, and County regulations were considered for their applicability in reducing the effects of development under the General Plan and the proposed project. Where applicable, the same existing regulations, policies, and mitigation measures addressed in the 2011 General Plan EIR and FCI EIR to reduce potential impacts for each environmental issue are also incorporated into this SEIR. Where no applicable regulations exist, this SEIR incorporates the adopted General Plan implementation policies and 2011 General Plan EIR and 2016 FCI EIR mitigation measures.

1.9 Discretionary Actions, Decisions and Approvals

1.9.1 Supplemental Environmental Impact Report

As the CEQA lead agency, the County has the principal responsibility for approving the proposed project and certifying the accompanying Final SEIR. Table 1-5 provides a summary list of the discretionary actions that would be required for the proposed project.

Table 1-5. List of Required Discretionary Actions for the Proposed Project

Discretionary Action	Agency
Certification of Final SEIR	County of San Diego
Adoption of Mitigation Monitoring and Reporting Program	County of San Diego
Adoption of Findings of Fact	County of San Diego
Adoption of Statement of Overriding Considerations	County of San Diego
Adoption of the Alpine Community Plan Update	County of San Diego
Approval of the General Plan Amendment	County of San Diego
Approval of the Rezone	County of San Diego

Note: The purpose of this SEIR is to analyze the proposed project and is intended to apply to the listed project approvals.

1.9.2 Other Agencies

1.9.2.1 Subsequent Project Review

Subsequent projects implemented under the Alpine CPU may require review and approval by other public and quasi-public agencies and jurisdictions that have purview over specific actions. These agencies may also consider this SEIR in their reviews and decision-making processes. Other jurisdictional permits, approvals, or will-serve letters could include but are not limited to:

- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers
- California Department of Fish and Wildlife
- San Diego Regional Water Quality Control Board
- San Diego Air Pollution Control District
- San Diego County Fire Authority
- Alpine Fire Protection District
- Lakeside Fire Protection District
- San Diego County Sheriff's Department
- School Districts (Alpine Union, Cajon Valley Union, and/or Grossmont Union High)
- Sanitation Districts (Alpine and/or Lakeside Sanitation Districts)
- Water Districts (Padre Dam Municipal Water District; South Bay Irrigation District)
- County of San Diego Franchise Waste Hauler (Allied Waste)
- San Diego Gas and Electric

1.9.3 Other Agencies Having Jurisdiction within Alpine CPA

Detailed below are other agencies or entities that control or manage land within the boundary of the Alpine CPA. These entities are subject to the federal environmental review regulations (i.e., National Environmental Policy Act) when it comes to the environmental review of their projects.

1.9.3.1 Viejas Band of Kumeyaay Indians

The Viejas Band of Kumeyaay Indians (Viejas) is a sovereign government recognized by the United States government. Tribal governments are autonomous entities that conduct responsibilities of many governing bodies, with such structures as executive, legislative, and judicial branches. The Viejas Government is founded on a participatory democracy, comprised of two active levels — general council and tribal council. Tribal government officials are elected to four-year terms of office by the general council, which includes all of the band's voting members. The Viejas Reservation is approximately 1,600 acres in size. Within the Reservation, Viejas owns and operates Viejas Casino and Resort, Viejas Outlets, and Ma-Tar-Awa Recreational Vehicle Park.

1.9.3.2 United States Forest Service

The United States Forest Service manages the Cleveland National Forest, located in eastern San Diego County and parts of Orange, Riverside and Imperial Counties. The Cleveland National Forest is the southern-most National Forest in California. Consisting of 460,000 acres, the forest offers a wide variety of terrains and recreational opportunities. Regarding forest planning, the Forest and Rangeland Renewable Resources Planning Act, as amended by the National Forest Management Act, establishes a process for developing, amending, and revising land management plans for units of the National Forest System.

The Cleveland National Forest Land Management Plan (LMP) went into effect on October 1, 2006. The revised LMP for the Cleveland National Forest describes the strategic direction at the broad program-level for managing the land and its resources. The LMP is intended to facilitate the process for adapting to change and documents the need to update, amend and eventually revise LMPs in order to achieve desired conditions while ensuring healthy National Forests.

1.10 Project Consistency with Applicable Plans

There are 19 jurisdictions in San Diego County, including the unincorporated County, with local land use authority and the responsibility for preparing their own general plans and associated environmental documents. Regional coordination is necessary to guide overall development and ensure an efficient allocation of infrastructure funding. SANDAG serves as the region's Metropolitan Planning Organization responsible for area-wide coordination and the technical and informational resource for the region's local jurisdictions. SANDAG prepares regional land use and transportation plans, which provide a basis for allocating federal and state funds used for specific items such as land use incentives and transportation improvements. The County also works with the San Diego County Regional Airport Authority on a regular basis to ensure land use compatibility with regional airports; however, the Alpine CPA is not within the Airport Influence Area for any public airports. Other agencies with regional documents affecting land use in the County are the San Diego Regional Water Quality Control Board and the San Diego Air Pollution Control District. The proposed project's consistency with all applicable planning documents is analyzed in Section 2.9, Land Use, of this SEIR.

In addition, as discussed in Section 1.7.3 above, subsequent projects within the Alpine CPU subarea boundaries will be reviewed to determine whether the subsequent project is within the scope of this SEIR or if additional environmental review is required. All future projects will be subject to review for consistency with the goals and policies of the Alpine CPU, as well as the approved land use and zoning designations.

1.11 Cumulative Methodology and Setting

CEQA requires that an EIR discuss cumulative impacts in addition to project-level impacts. According to Section 15355 of CEQA Guidelines, "cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of the environmental impacts attributable to a project alone. Further, the discussion is guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact.

CEQA Guidelines Section 15130(a) requires EIRs to discuss the cumulative impacts of a project when a project's incremental effect is cumulatively considerable. As defined in CEQA Guidelines Section 15065 "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The Guidelines indicate when a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but shall briefly describe the basis for its conclusion. In addition, the Guidelines allow for a project's contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

The geographic scope defines the geographic area within which projects may contribute to a specific cumulative impact. Generally, the geographic scope of the area affected by cumulative effects varies according to the environmental issue area. The geographic scope for each issue area is described further under the respective resource section of Chapter 2, Environmental Effects of the Proposed Project.

According to CEQA Guidelines Section 15130(b) there are two methods for establishing the scope of a cumulative impacts analysis within the assumed area.

- The List Method includes a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those outside the control of the agency.
- The Plan Method uses the projections contained in an adopted general plan or related planning document, or in a prior adopted or certified environmental document, which describes or evaluates regional or area-wide conditions contributing to the cumulative impacts.

Because the proposed project involves a comprehensive update to the adopted Alpine Community Plan and would guide growth within the community over a 30-year planning horizon, the cumulative analysis for all issue areas utilizes the Plan Method. In the San Diego region, SANDAG serves as the regional transportation planning agency responsible for forecasting the region's population growth. These growth projections serve as the foundation for regional planning documents such as water supply management plans and general plans, and provide the basis for determining housing, infrastructure, and transportation needs across the San Diego region.

ORANGE COUNTY

RIVERSIDE COUNTY

IMPERIAL COUNTY

MEXICO

Pendleton - De Luz

Rainbow

Fallbrook

Palomar Mountain

Bonsall

Valley Center

Pala - Pauma

North Mountain

Borrego Springs

Twin Oaks

Hidden Meadows

North County Metro

Julian

Desert

San Dieguito

Ramona

Barona

Central Mountain

Cuyamaca

Lakeside

Descanso

Alpine

Pine Valley

Crest - Dehesa

Mountain Empire

Valle De Oro

County Islands

Spring Valley

Mountain Empire

Sweetwater

Jamul-Dulzura

Lake Morena / Campo

Potrero

Boulevard

Jacumba

Otay

Tecate

Alpine Community Plan Area

Unincorporated Area

Incorporated Area

Map Extents:

0 3.5 7 14

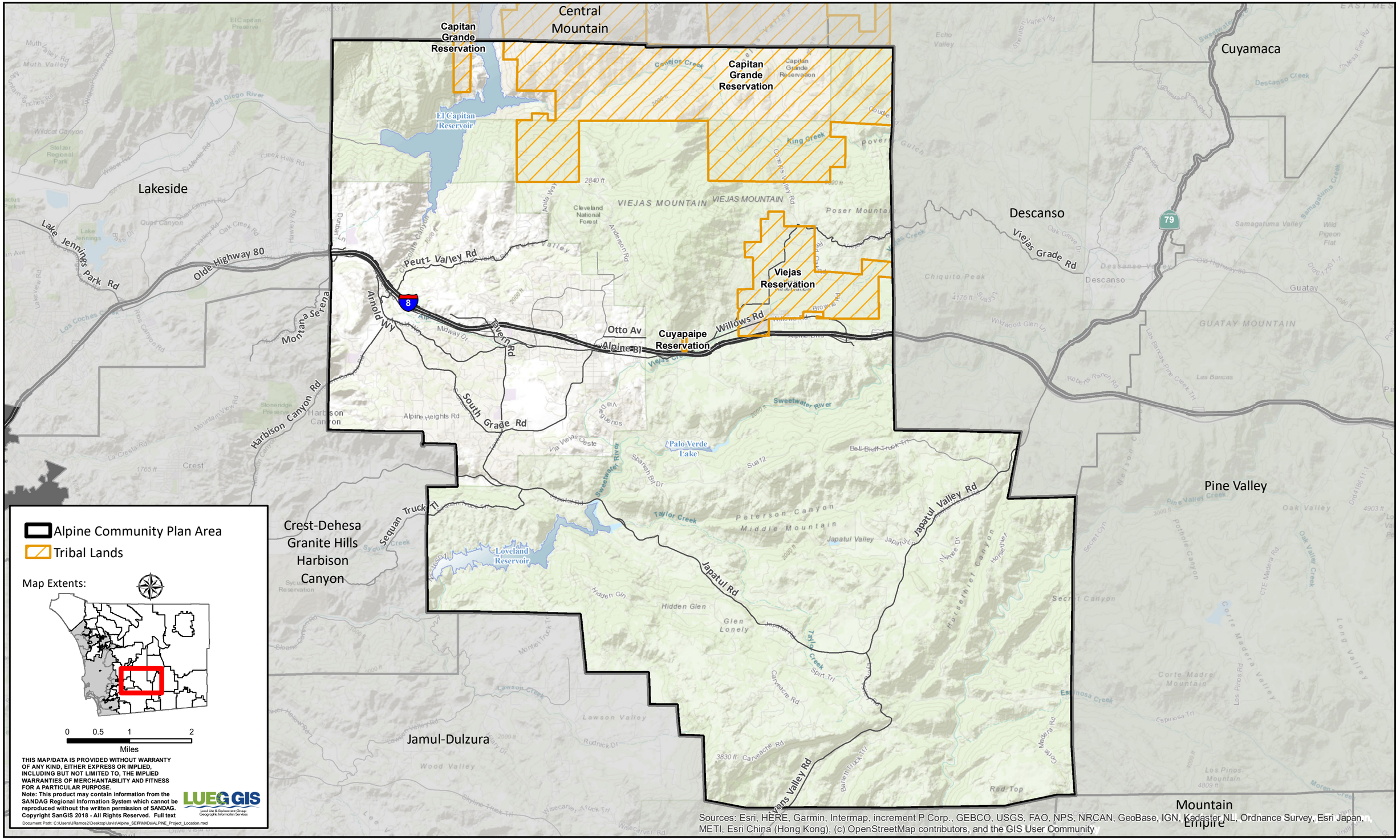
Miles

LUEG GIS Land Use & Environment Group Geographic Information Services

Document Path: C:\Users\JRamos2\Desktop\Javis\Alpine_SEIR\MXDs\ALPINE_Regional_Location.mxd

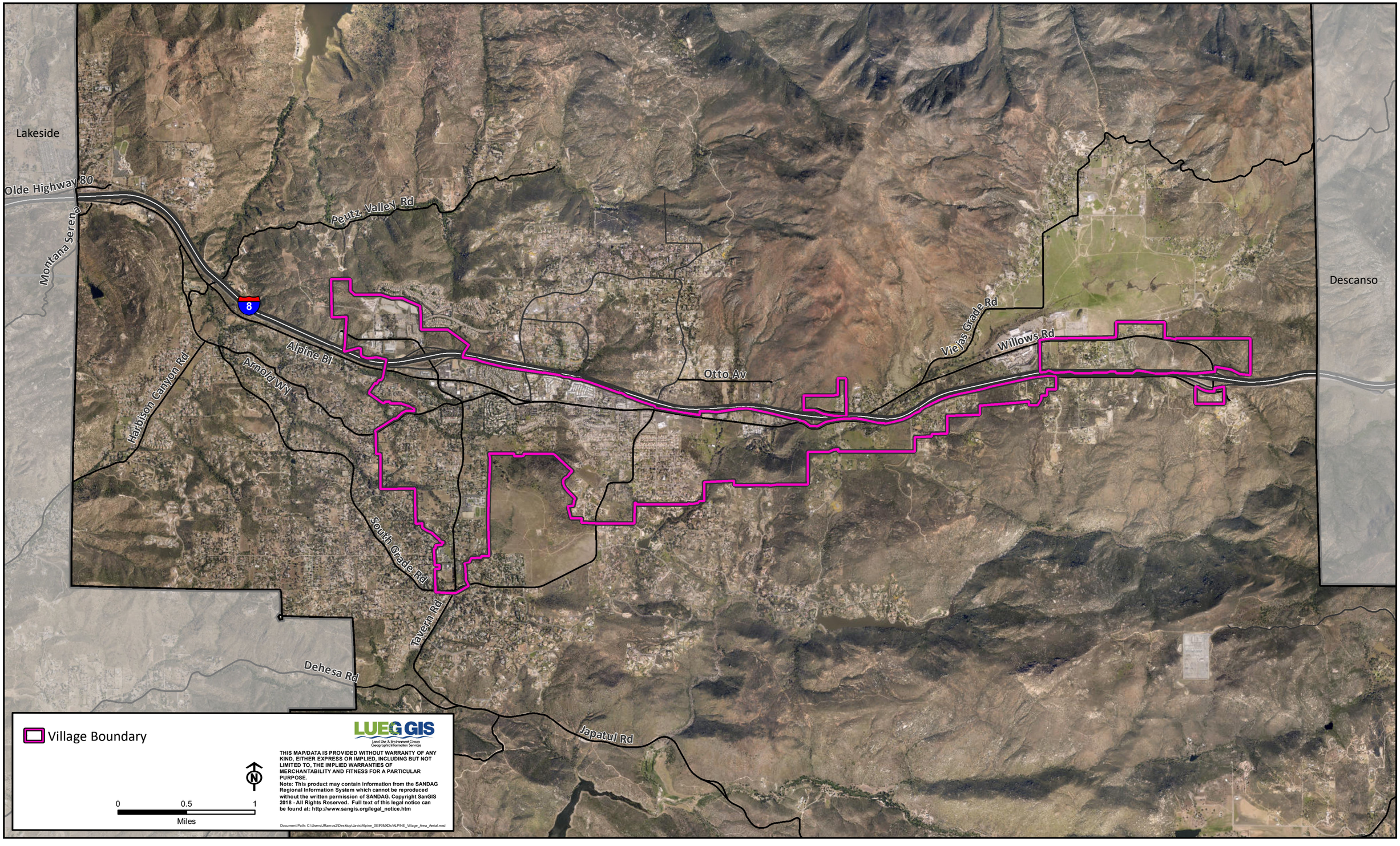
Source: SanGIS, County of San Diego, 2020

Figure 1-1
Regional Map



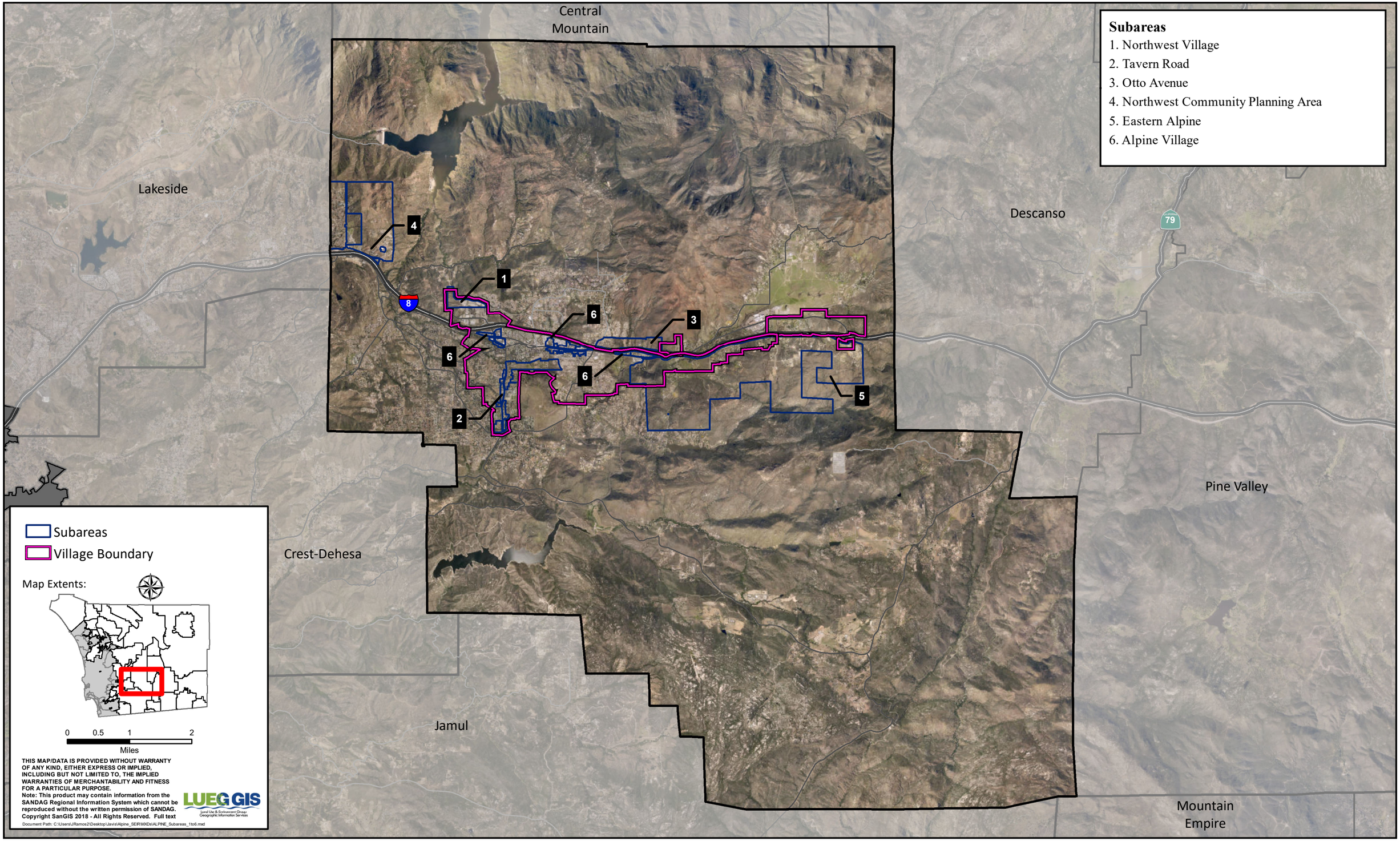
Source: SanGIS, County of San Diego, 2020

Figure 1-2
Project Location



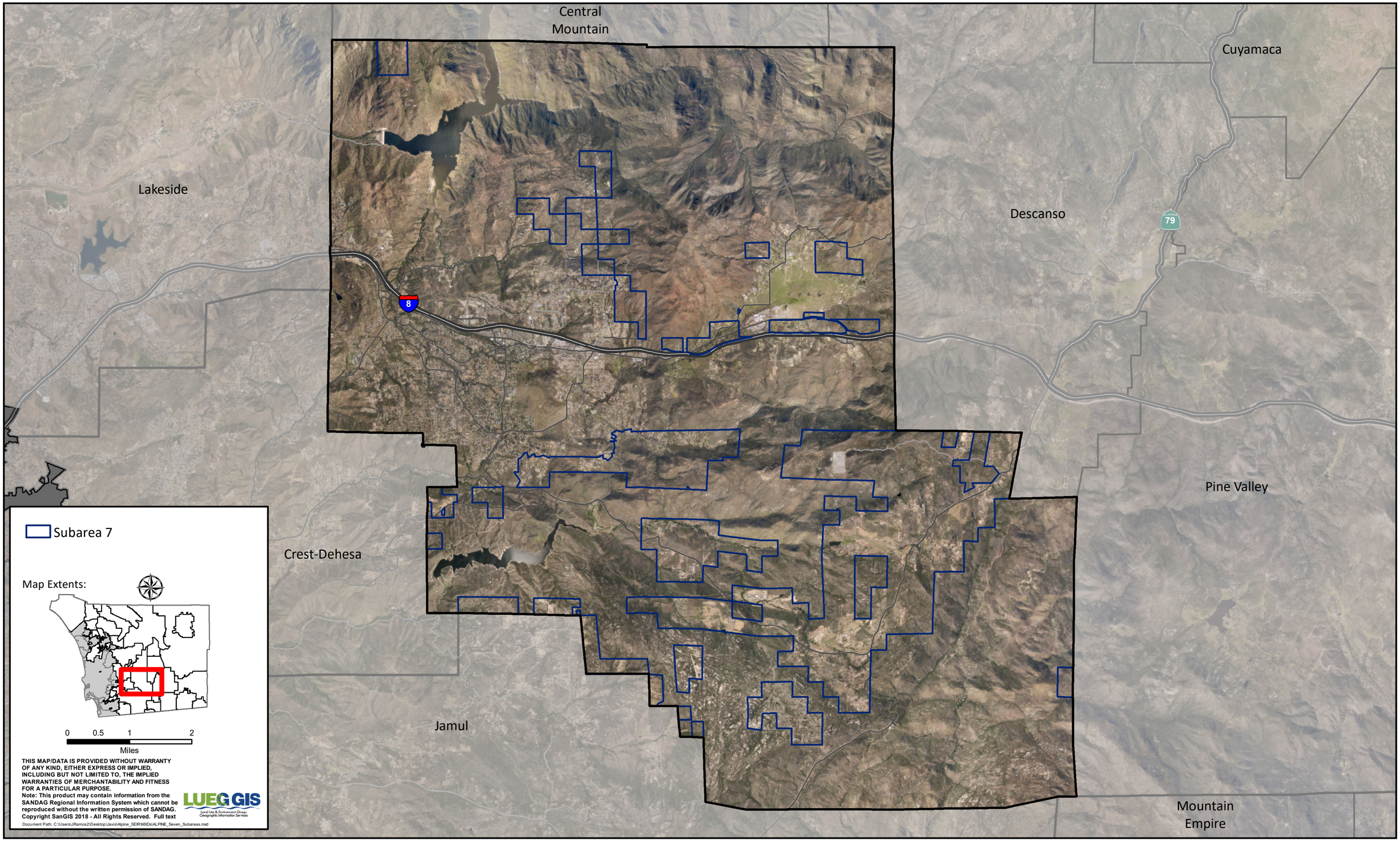
Source: SanGIS, County of San Diego, 2020

Figure 1-3
Alpine Village Area



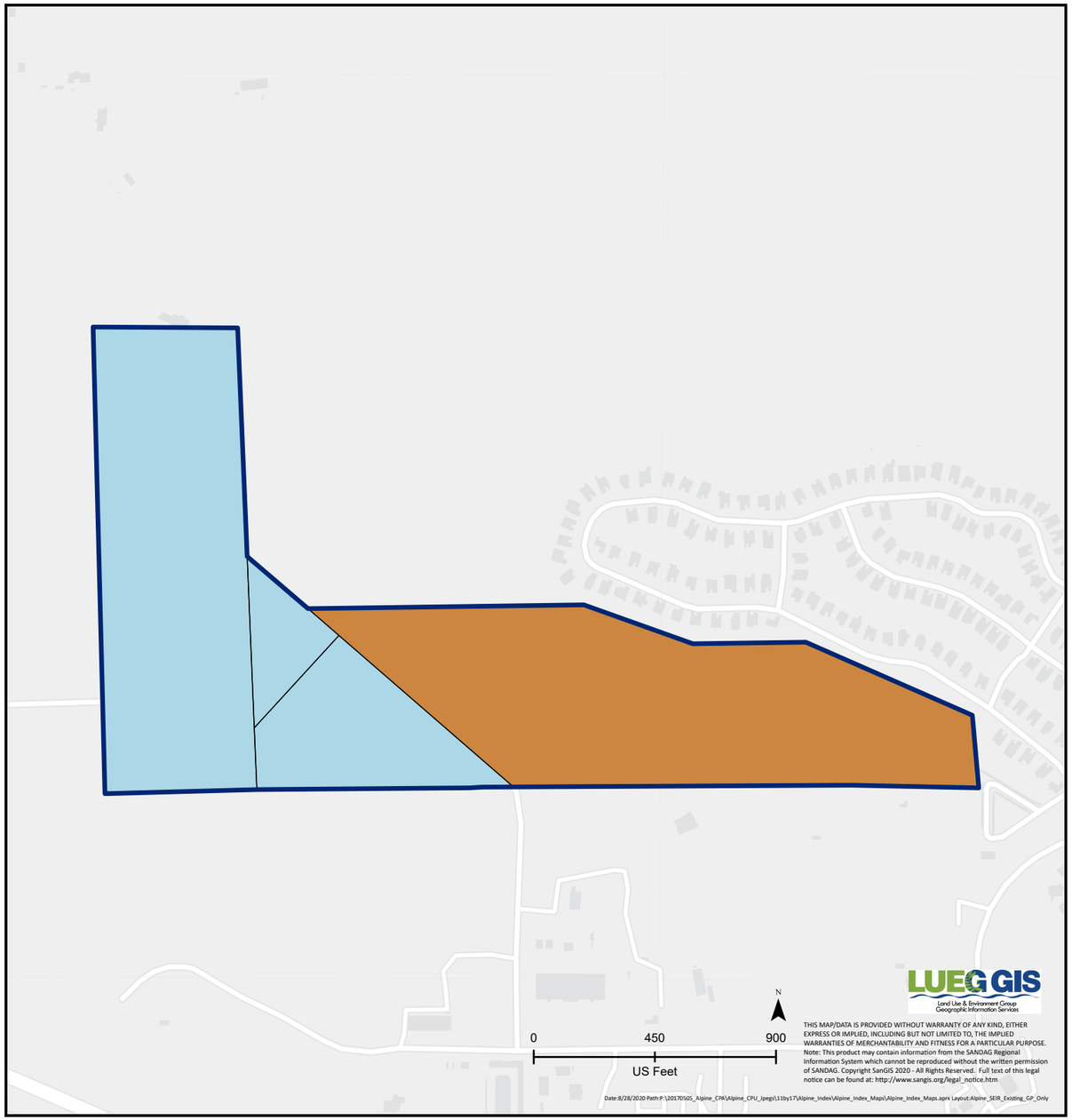
Source: SanGIS, County of San Diego, 2020

Figure 1-4a
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 1-4b
Subarea 7



Existing

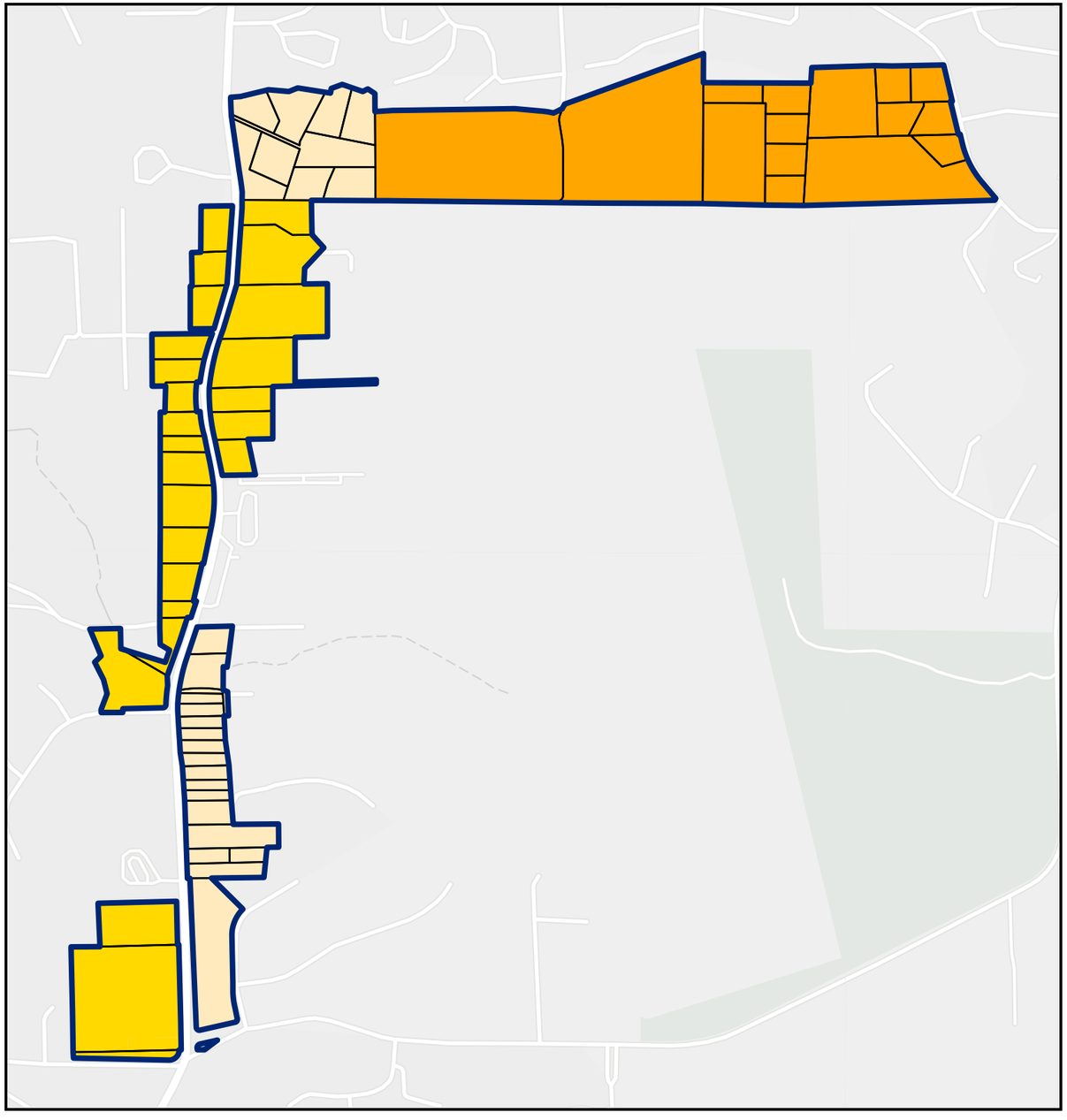
Subarea

Village Residential (VR-7.3)

Limited Impact Industrial

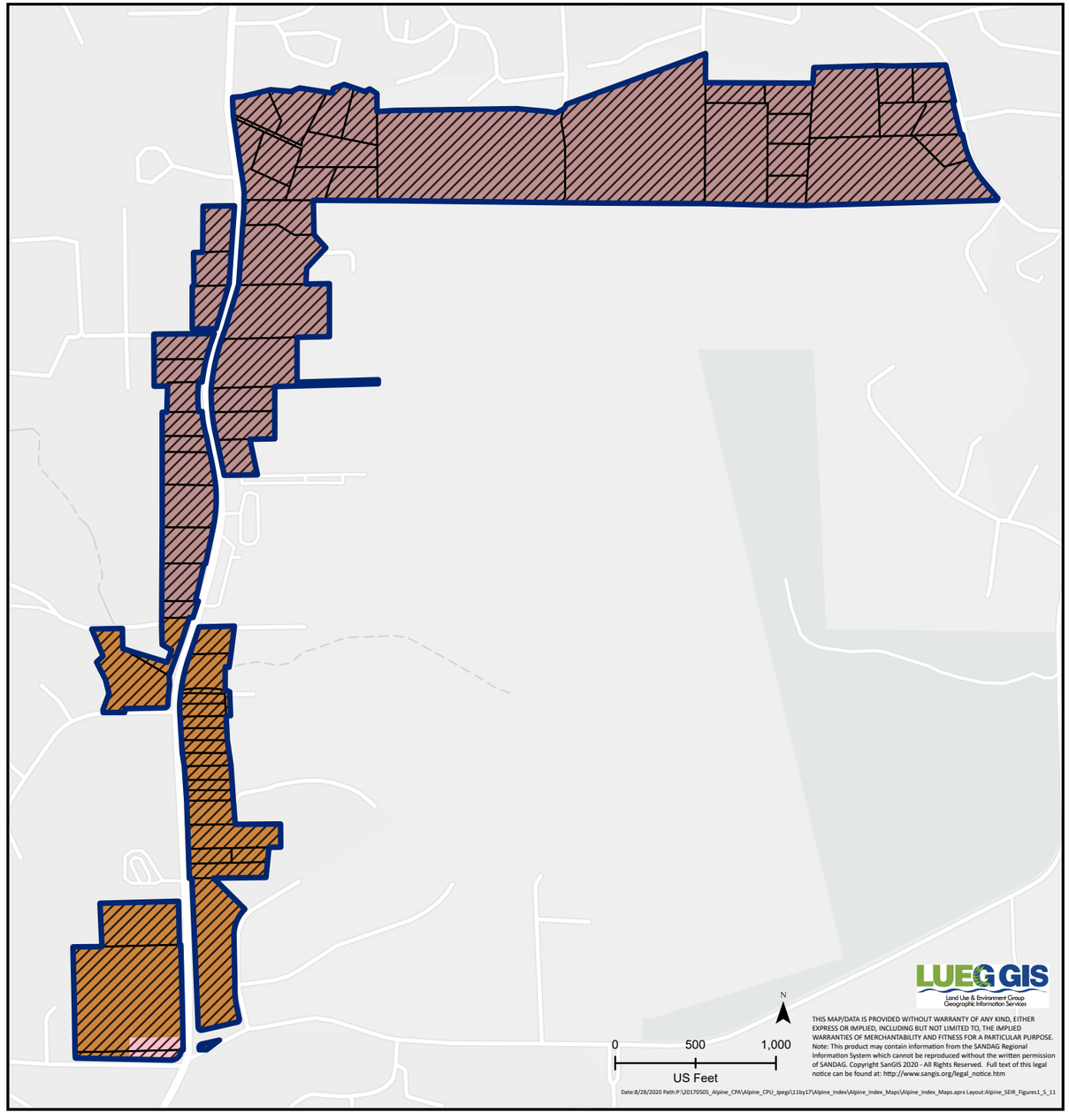
No Proposed Land Use Change

Figure 1-5
Existing and Proposed Land use for Subarea 1



Existing

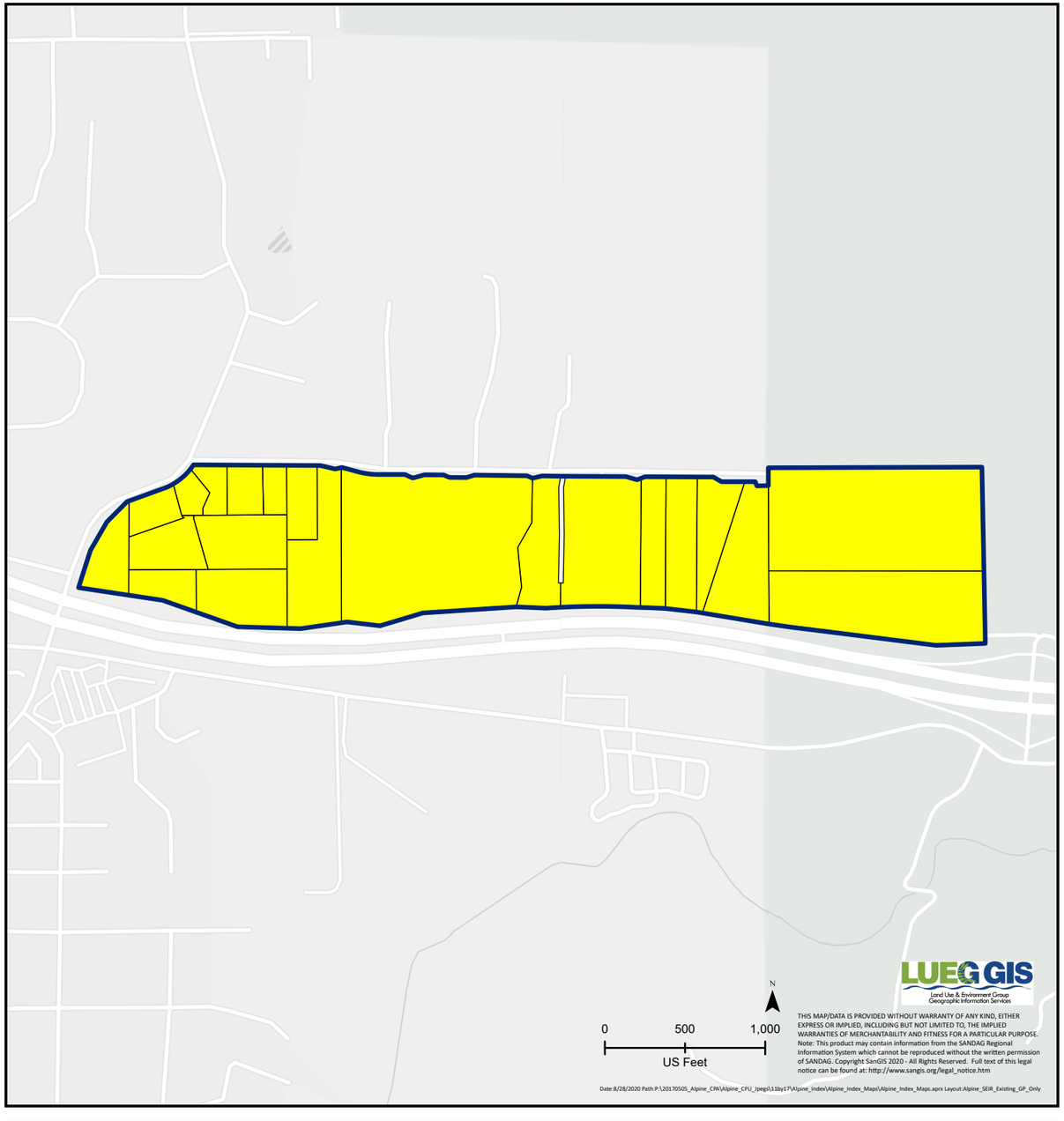
- Subarea
- Village Residential (VR-4.3)
- Village Residential (VR-2.9)
- Village Residential (VR-2)
- Semi-Rural Residential (SR-1)



Proposed

- Subarea
- Proposed Change In Density
- Village Residential (VR-10.9)
- Village Residential (VR-7.3)
- Neighborhood Commercial

Figure 1-6
Existing and Proposed Land use for Subarea 2



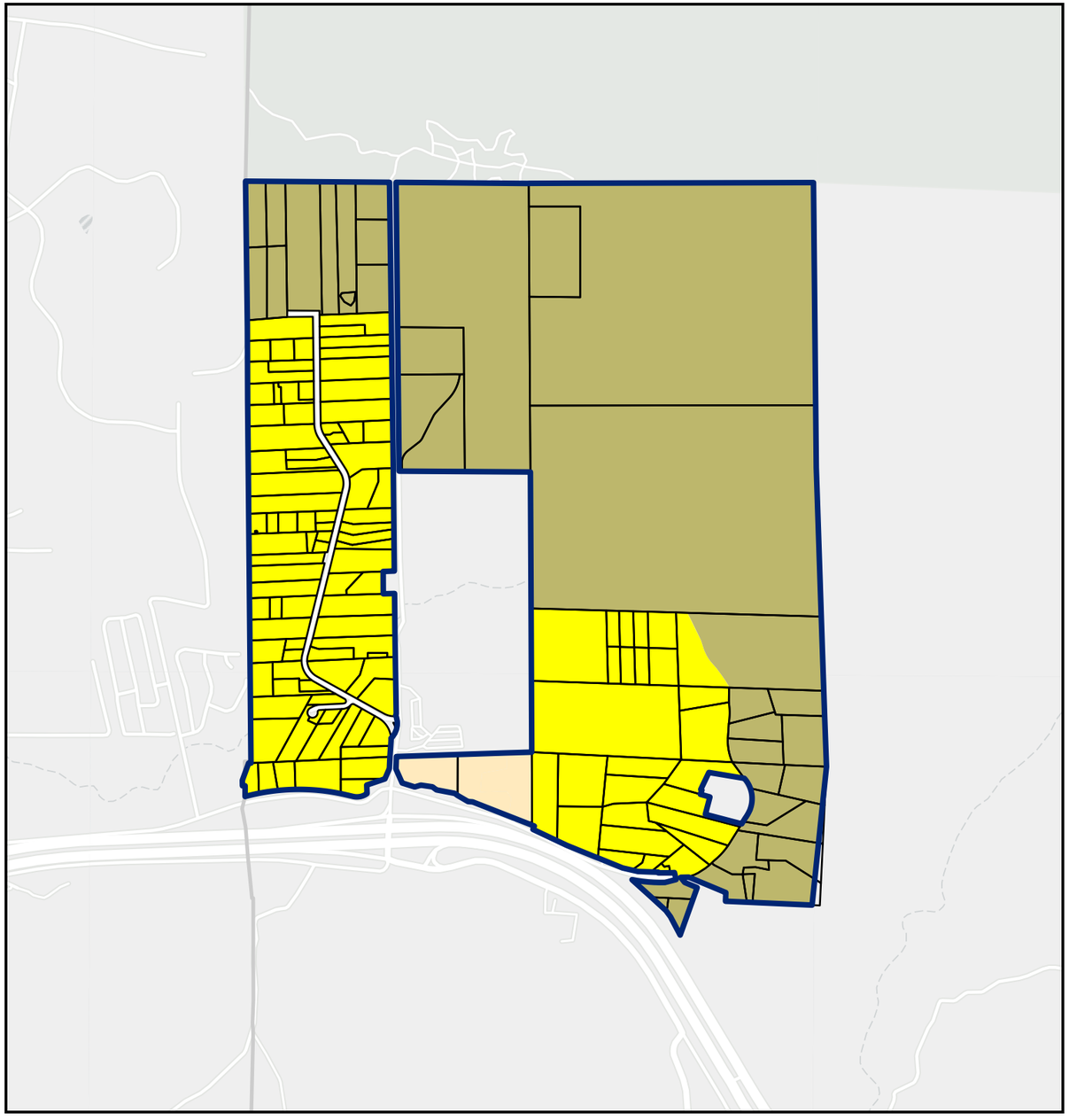
Existing

Subarea

Semi-Rural Residential (SR-1)

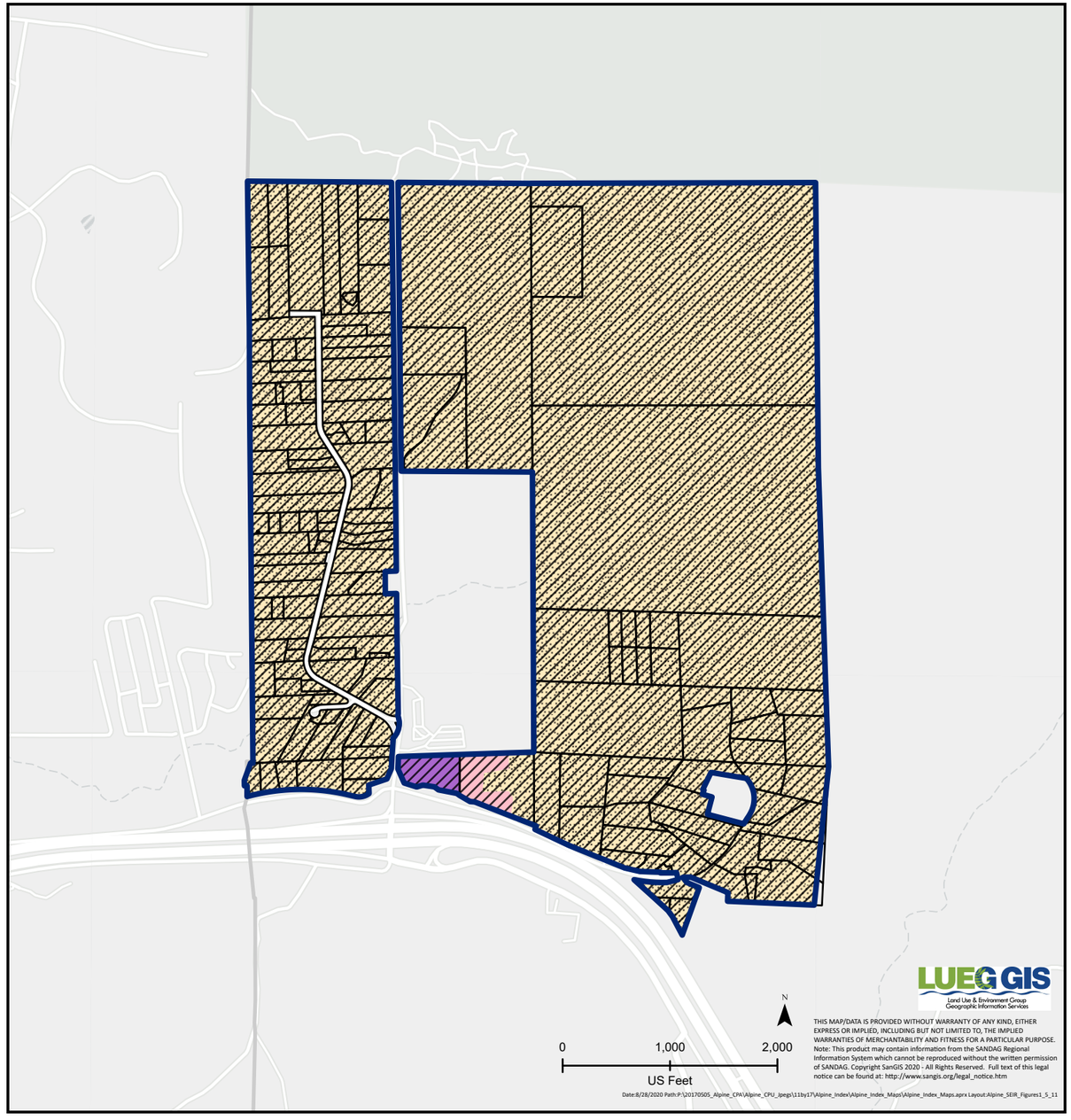
No Proposed Land Use Change

Figure 1-7
Existing and Proposed Land use for Subarea 3



Existing

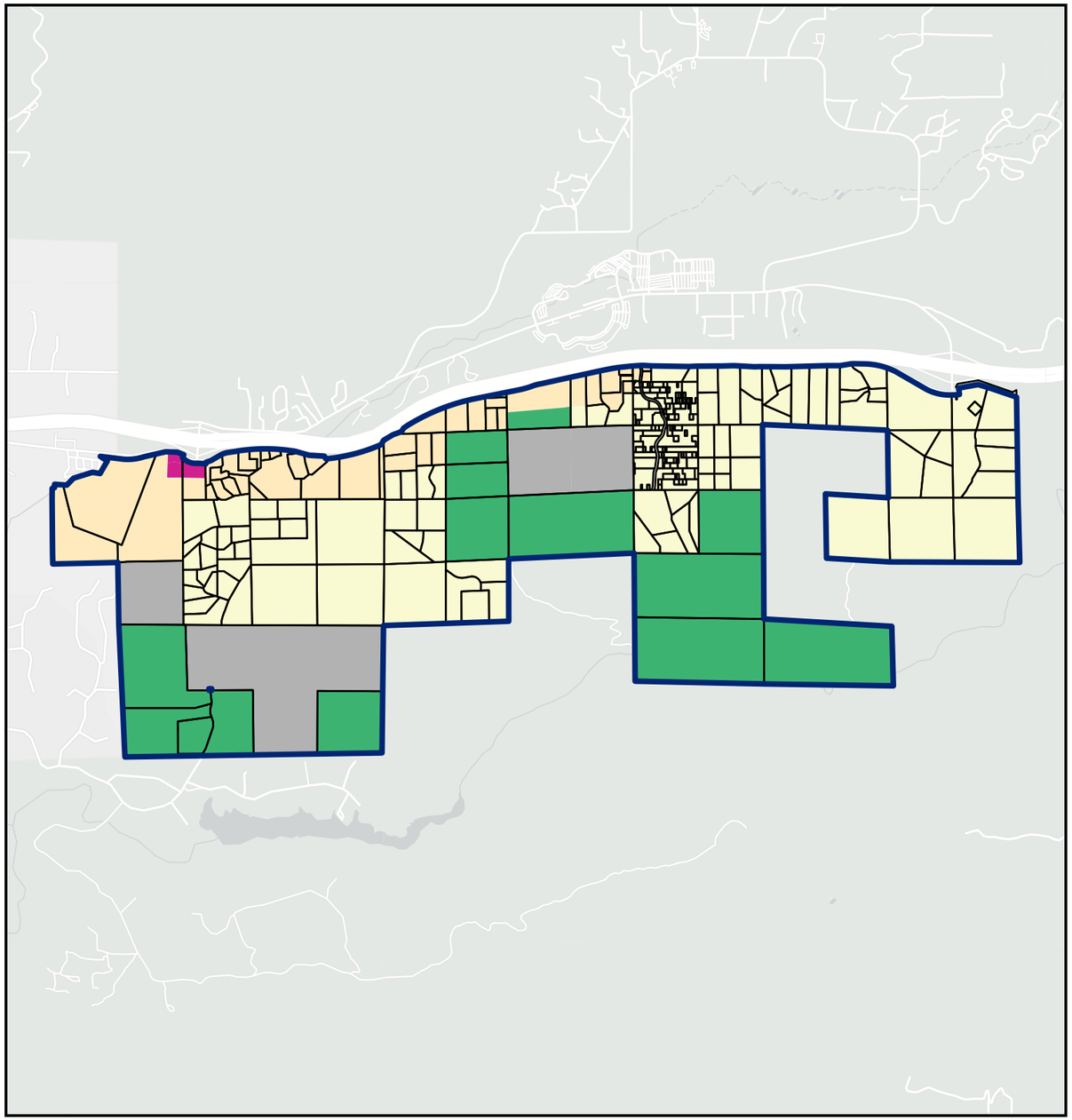
- Subarea
- Village Residential (VR-2)
- Semi-Rural Residential (SR-1)
- Semi-Rural Residential (SR-2)



Proposed

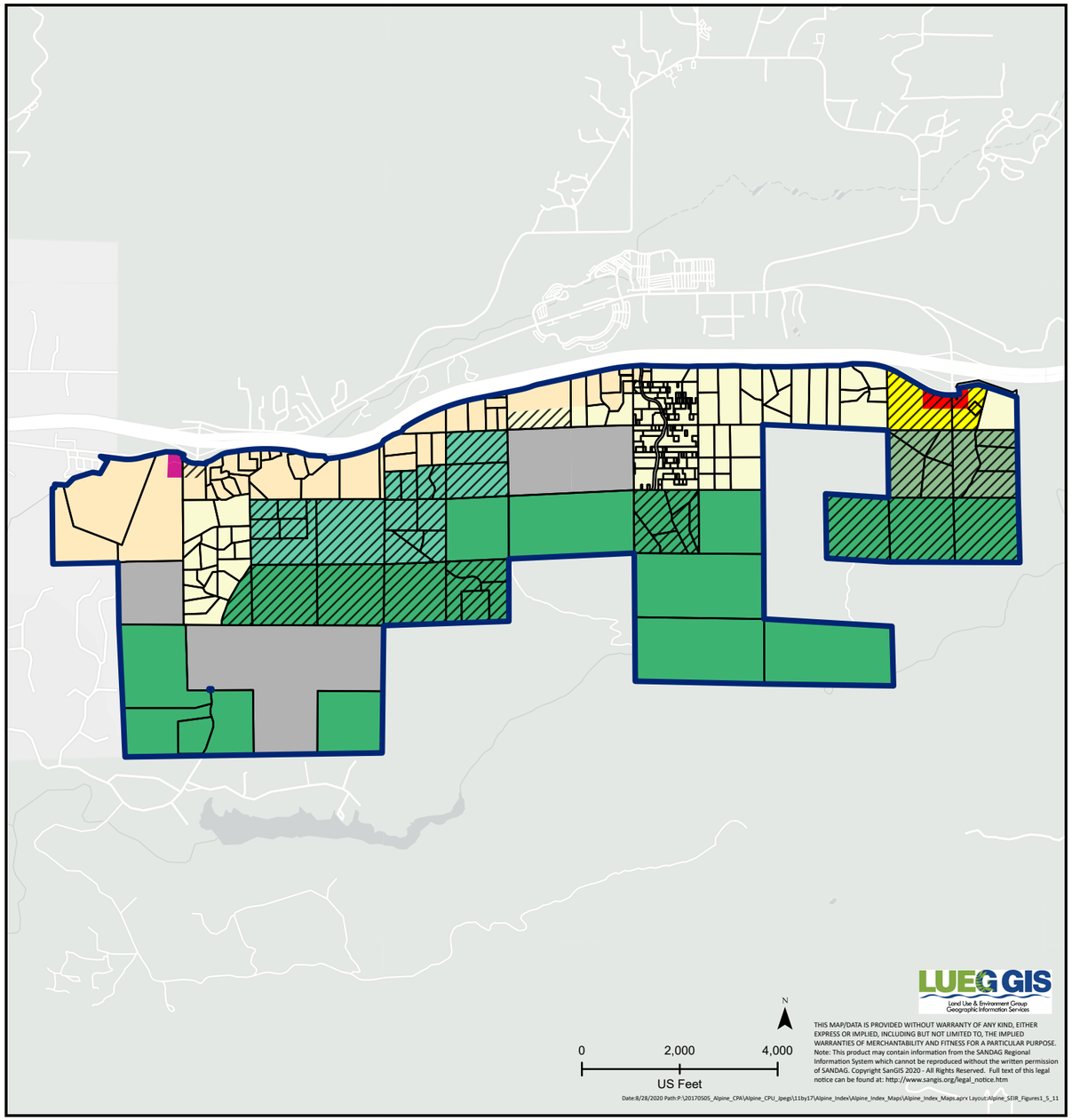
- Subarea
- Proposed Change In Density
- Semi-Rural Residential (SR-.5)
- Neighborhood Commercial
- Village Core Mixed Use

Figure 1-8
Existing and Proposed Land use for Subarea 4



Existing

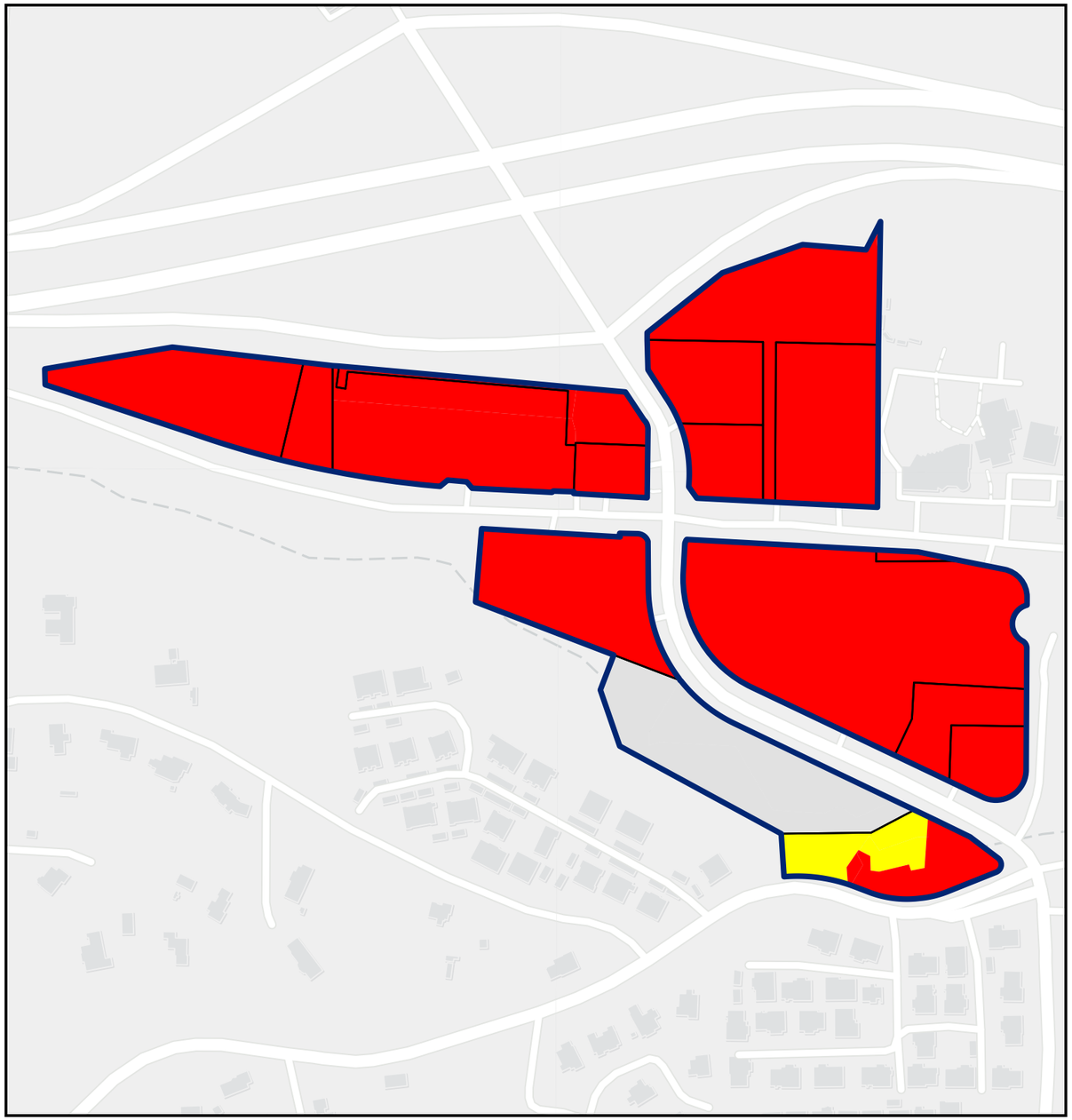
- Subarea
- Village Residential (VR-2)
- Semi-Rural Residential (SR-4)
- Rural Lands (RL-40)
- Rural Commercial



Proposed

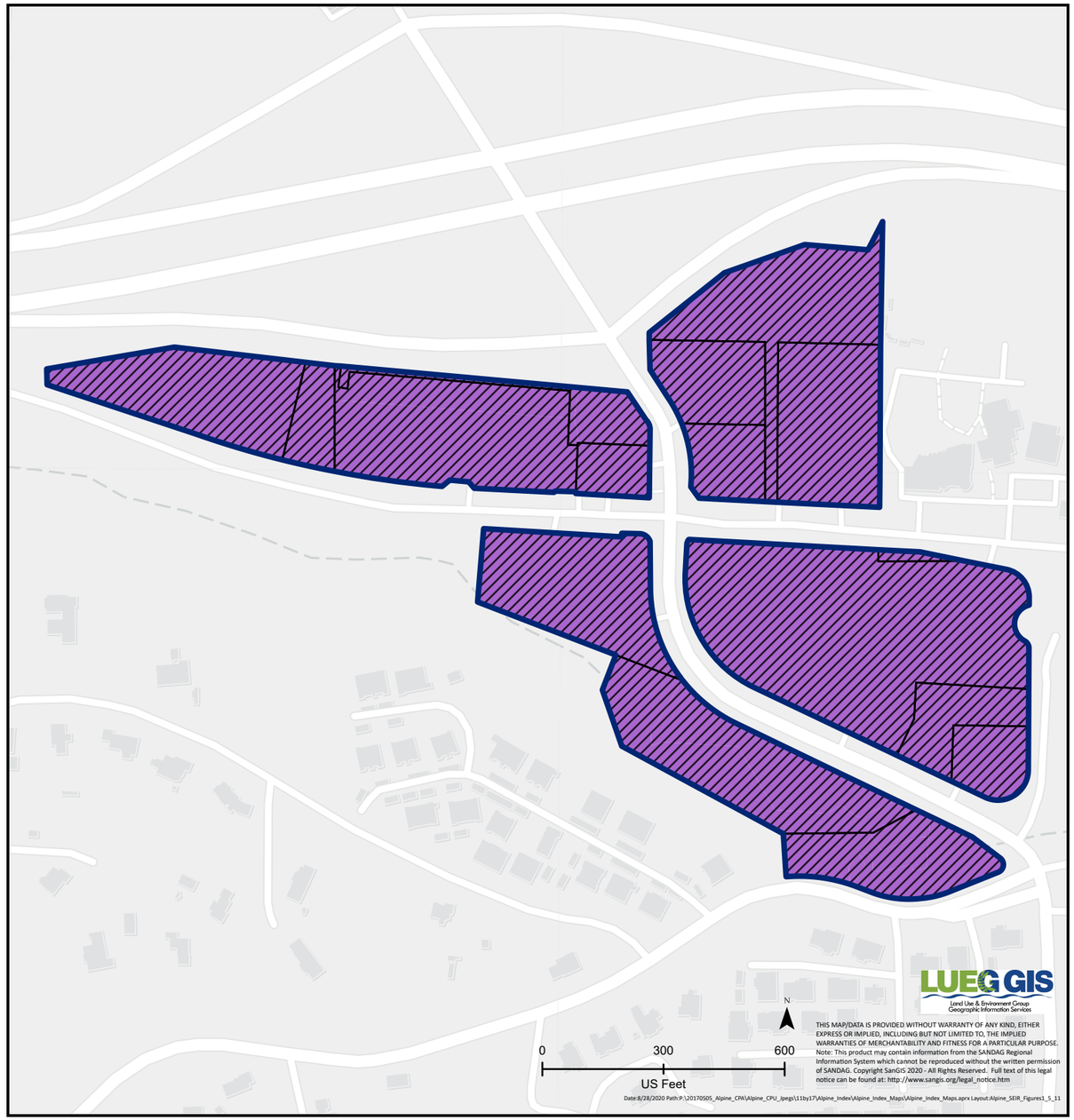
- Subarea
- Proposed Change In Density
- Village Residential (VR-2)
- Semi-Rural Residential (SR-1)
- Semi-Rural Residential (SR-4)
- Semi-Rural Residential (SR-10)
- Rural Lands (RL-20)
- Rural Lands (RL-40)
- General Commercial
- Rural Commercial
- Public Agency Lands

Figure 1-9
Existing and Proposed Land use for Subarea 5



Existing

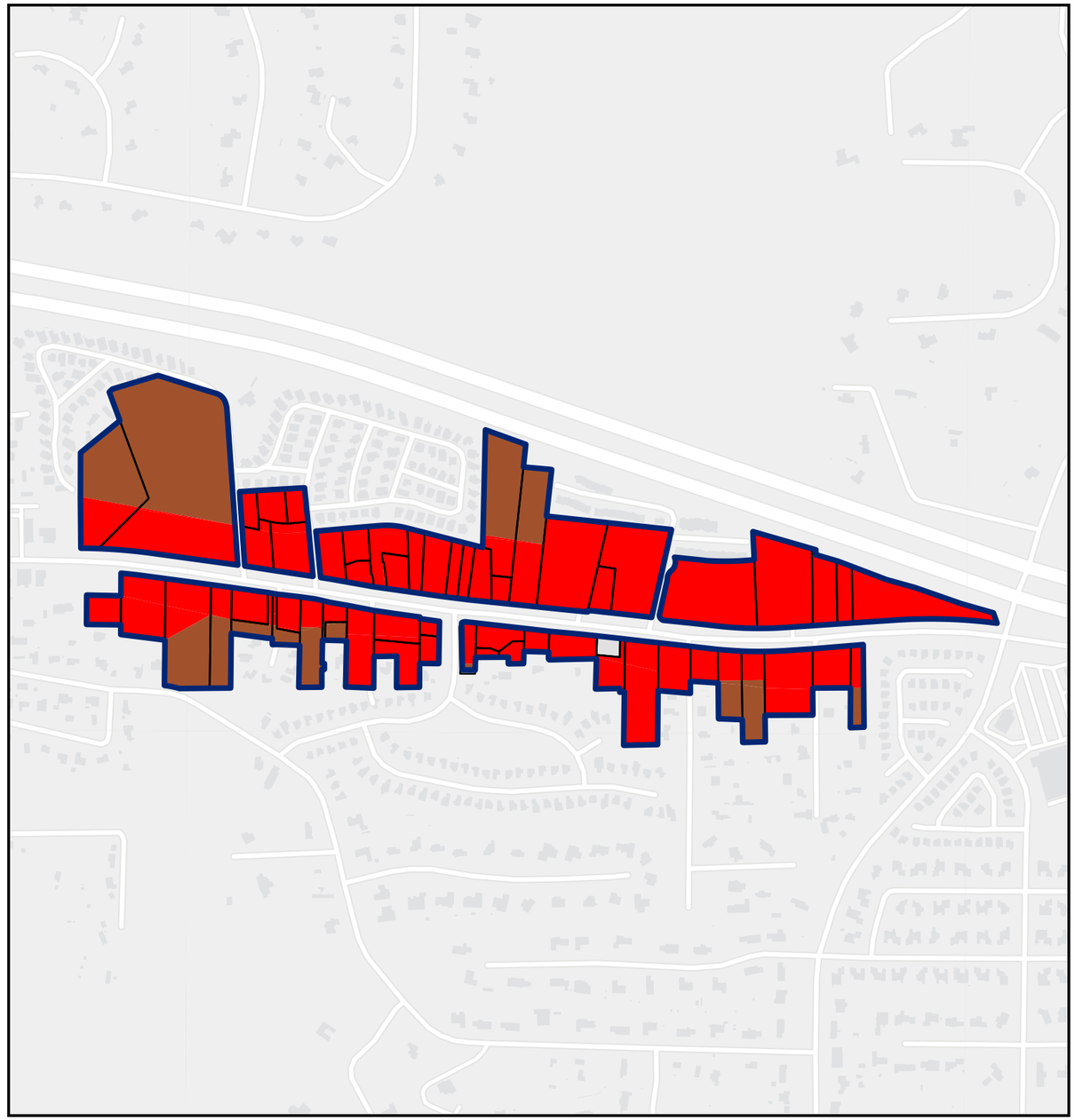
- Subarea
- Semi-Rural Residential (SR-1)
- General Commercial
- Public/Semi-Public Facilities



Proposed

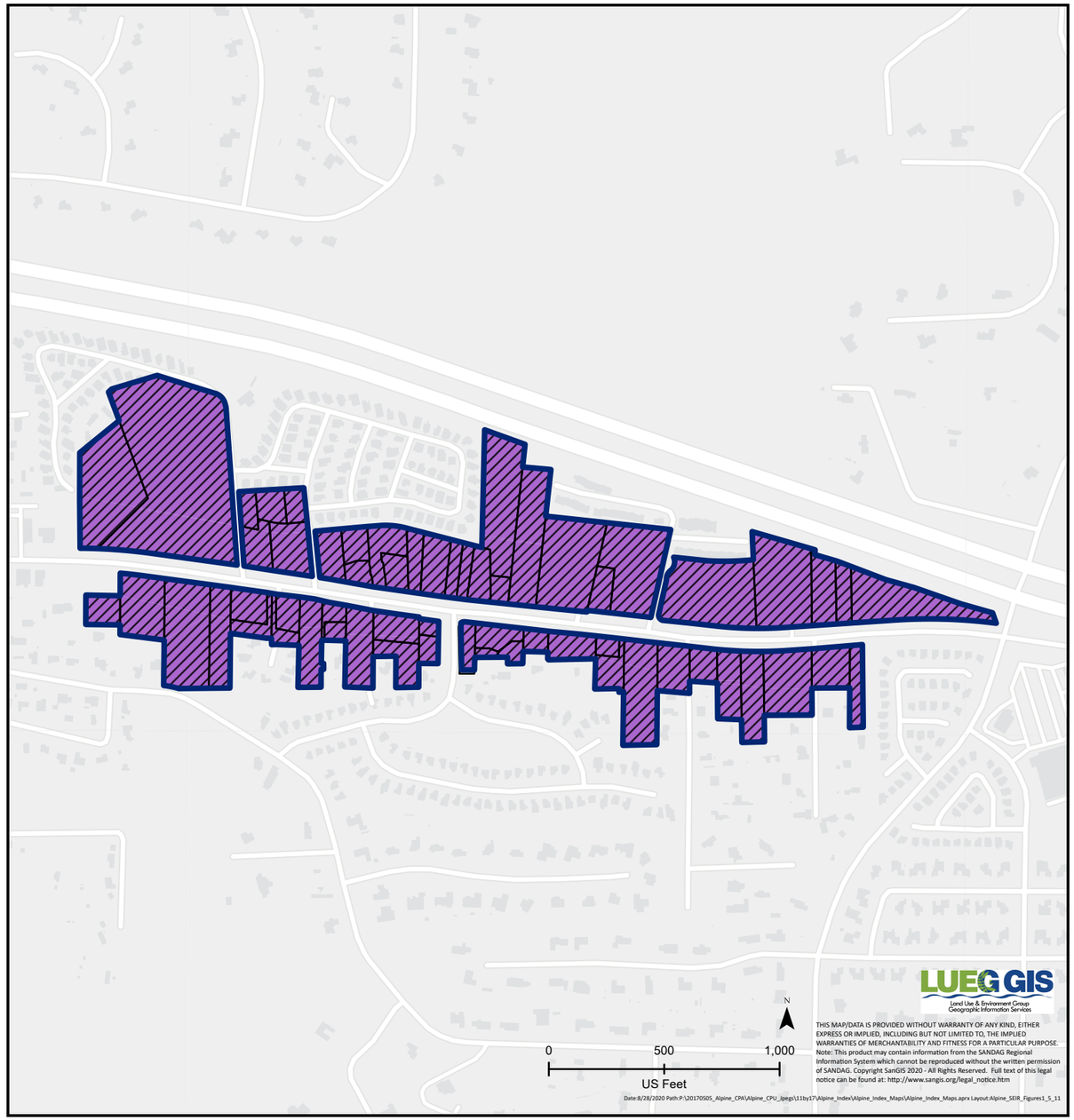
- Subarea
- Proposed Change In Density
- Village Core Mixed Use

Figure 1-10a
Existing and Proposed Land use for Subarea 6



Existing

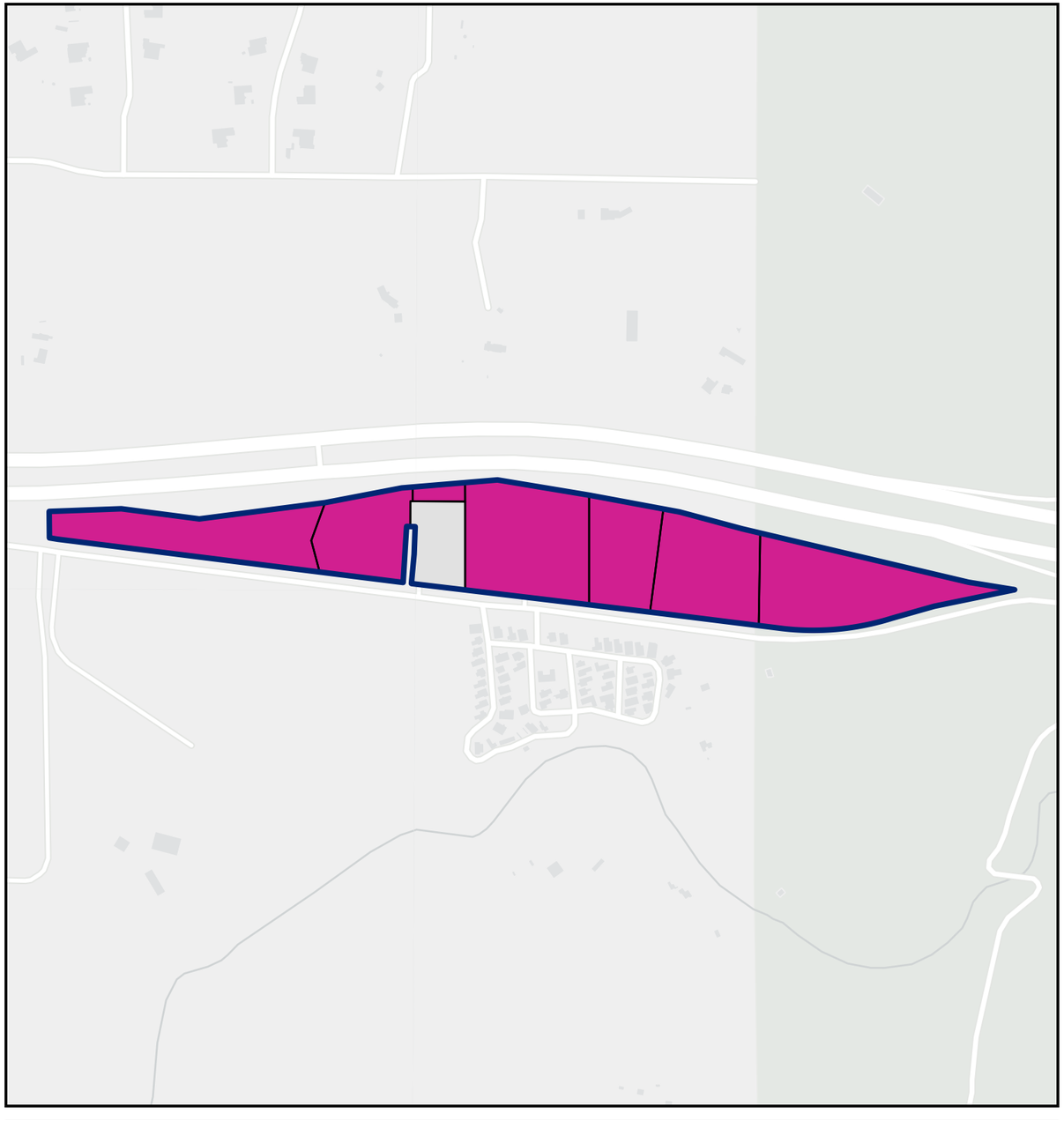
- Subarea
- Village Residential (VR-15)
- General Commercial
- Public/Semi-Public Facilities



Proposed

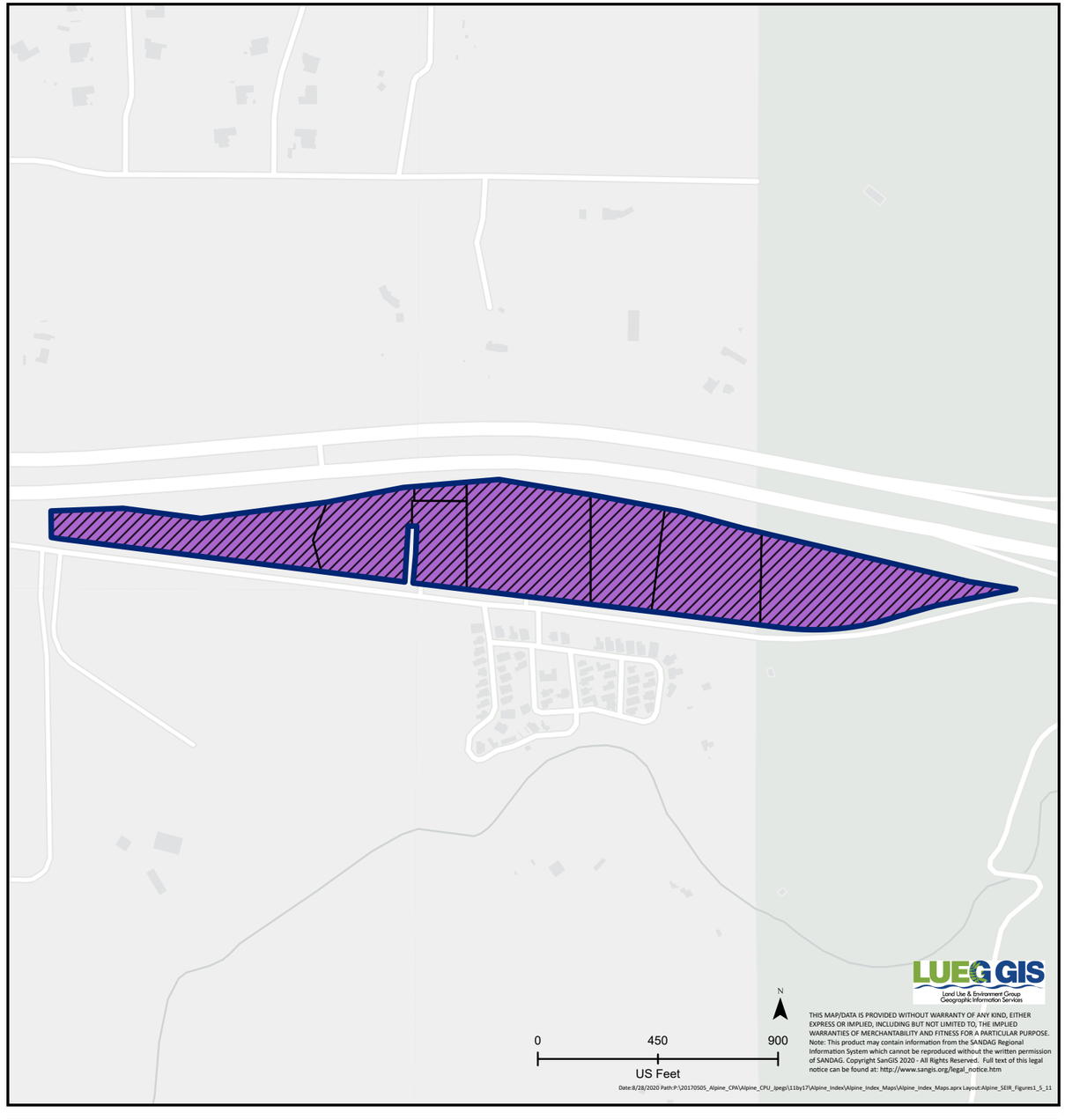
- Subarea
- Proposed Change In Density
- Village Core Mixed Use

Figure 1-10b
Existing and Proposed Land use for Subarea 6



Existing

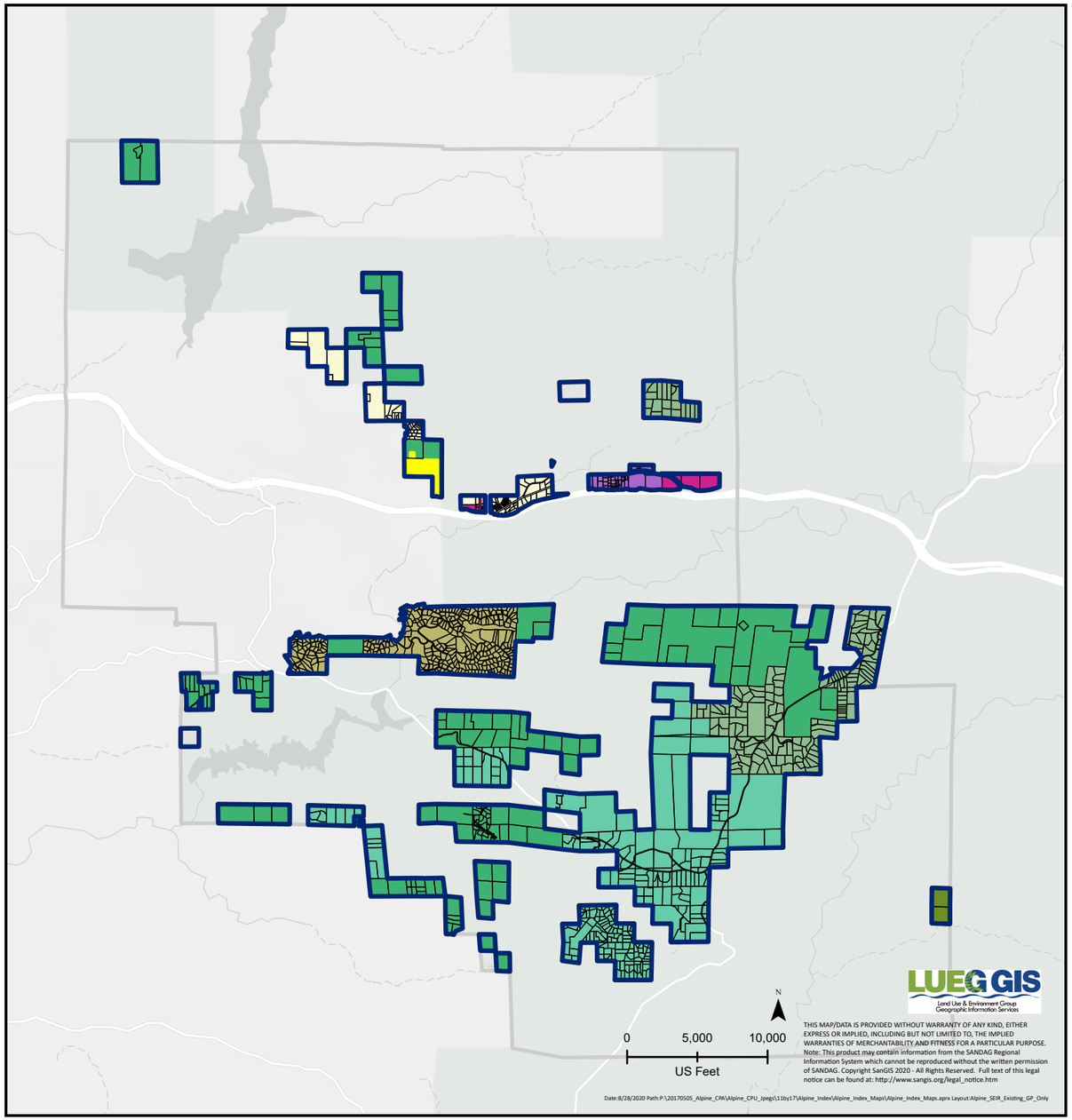
- Subarea
- Rural Commercial
- Public/Semi-Public Facilities



Proposed

- Subarea
- Proposed Change In Density
- Village Core Mixed Use

Figure 1-10c
Existing and Proposed Land use for Subarea 6

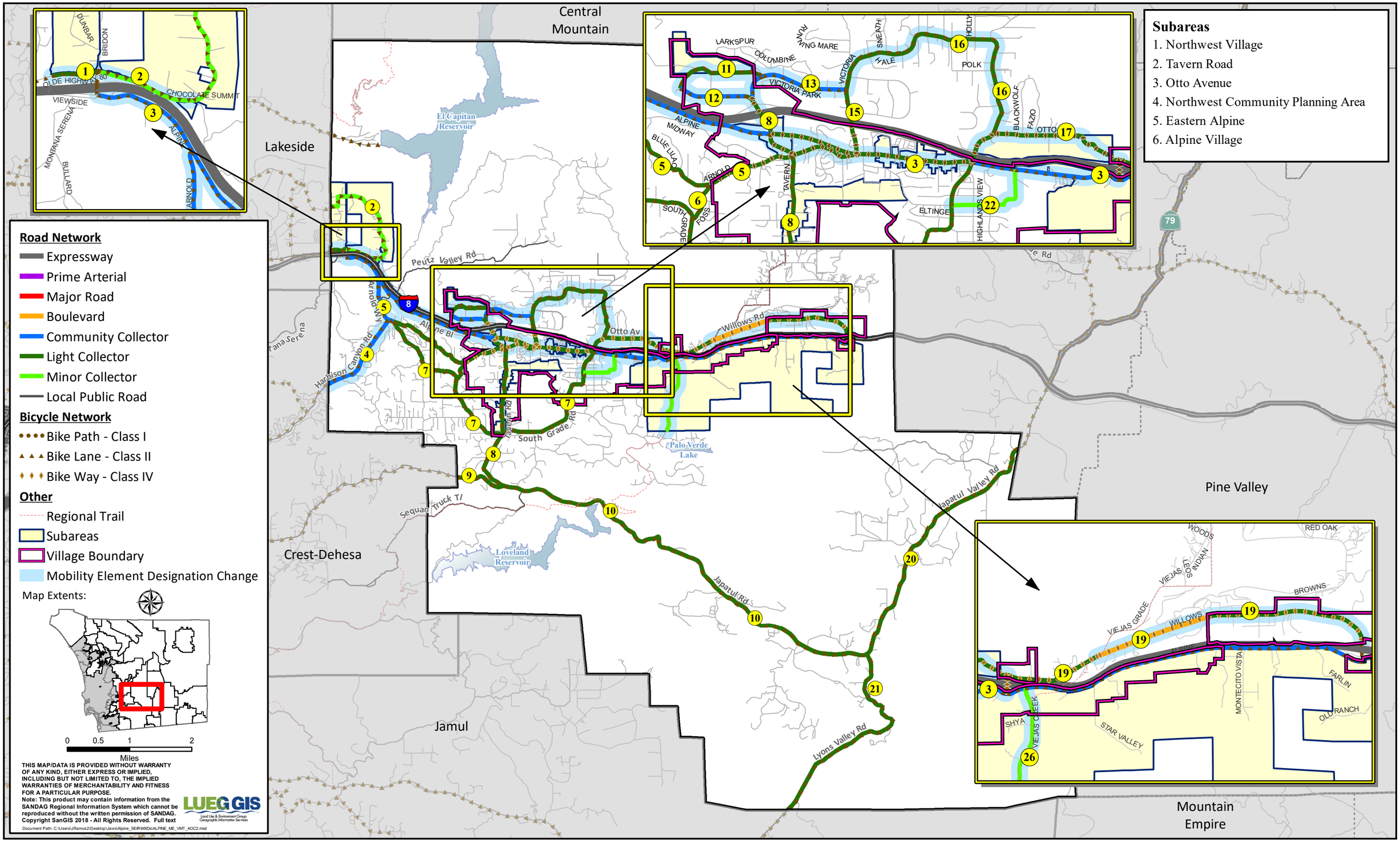


Existing

- Subarea
- Semi-Rural Residential (SR-1)
- Semi-Rural Residential (SR-2)
- Semi-Rural Residential (SR-4)
- Semi-Rural Residential (SR-10)
- Rural Lands (RL-20)
- Rural Lands (RL-40)
- Rural Lands (RL-80)
- Rural Commercial
- Village Core Mixed Use
- Public/Semi-Public Facilities
- Tribal Lands

No Proposed Land Use Change

Figure 1-11
Existing and Proposed Land Use for Subarea 7



Subareas

1. Northwest Village
2. Tavern Road
3. Otto Avenue
4. Northwest Community Planning Area
5. Eastern Alpine
6. Alpine Village

Road Network

- Expressway
- Prime Arterial
- Major Road
- Boulevard
- Community Collector
- Light Collector
- Minor Collector
- Local Public Road

Bicycle Network

- Bike Path - Class I
- Bike Lane - Class II
- Bike Way - Class IV

Other

- Regional Trail
- Subareas
- Village Boundary
- Mobility Element Designation Change

Map Extents:

0 0.5 1 2

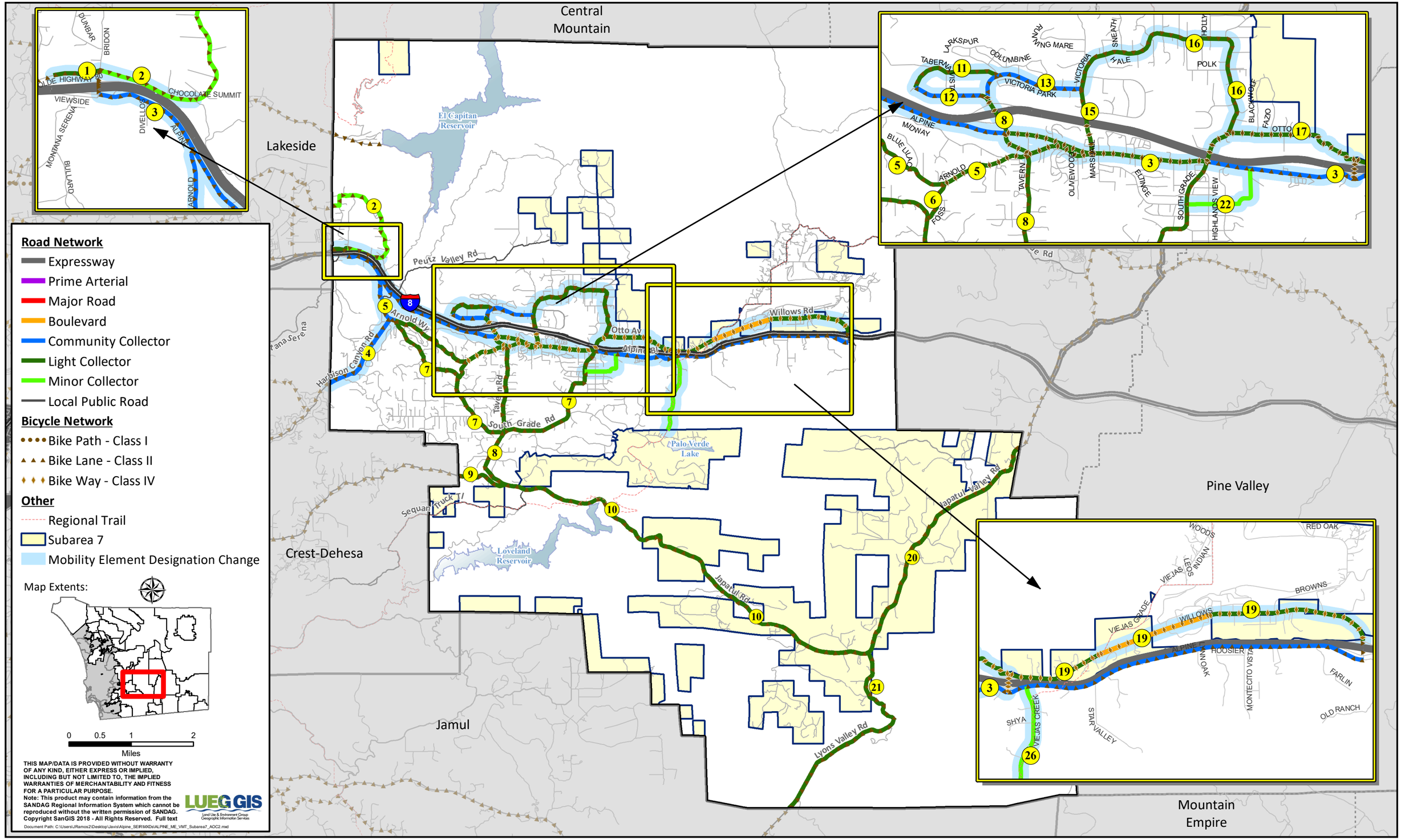
Miles

LUEG GIS Land Use & Environment Group Geographic Information Services

Document Path: C:\Users\JRamos2\Desktop\Java\Alpine_SEIR\MXDs\ALPINE_ME_VMT_AOC2.mxd

Source: SanGIS, County of San Diego, 2020

Figure 1-12a
Proposed Alpine ME Network Figure
Subareas 1-6



Road Network
- Expressway
- Prime Arterial
- Major Road
- Boulevard
- Community Collector
- Light Collector
- Minor Collector
- Local Public Road

Bicycle Network
- Bike Path - Class I
- Bike Lane - Class II
- Bike Way - Class IV

Other
- Regional Trail
- Subarea 7
- Mobility Element Designation Change

Map Extents:

0 0.5 1 2
Miles

LUEG GIS
Land Use & Environment Group Geographic Information Services

Document Path: C:\Users\JRamos2\Desktop\Jasis\Alpine_SEIR\MXDs\ALPINE_ME_VMT_Subarea7_AOC2.mxd

Source: SanGIS, County of San Diego, 2020

Figure 1-12b
Proposed Alpine ME Network Figure
Subarea 7

CHAPTER 2.0 ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

This chapter includes an analysis of the potential significant environmental effects resulting from implementation of the proposed project. Each environmental issue section provides a description of existing environmental conditions[1]; a discussion of applicable local, state, and federal regulations pertaining to that particular resource; criteria for determining significance of potential environmental impacts; an analysis of the project impacts and a determination of significance; a cumulative impact analysis considering past, present, and reasonably foreseeable future projects; and feasible mitigation measures that would reduce or avoid significant environmental impacts.

The following environmental issue areas are addressed in Chapter 2.

2.1	Aesthetics	2.8	Hydrology and Water Quality
2.2	Agriculture and Forestry Resources	2.9	Mineral Resources
2.3	Air Quality*	2.10	Noise
2.4	Biological Resources	2.11	Public Services
2.5	Cultural Resources	2.12	Recreation
2.6	Greenhouse Gas Emissions*	2.13	Transportation/Traffic*
2.7	Wildfire*	2.14	Utilities and Service Systems

* Air Quality, Greenhouse Gas Emissions, Wildfire, and Transportation/Traffic do not rely on the FCI EIR. The baseline for these subject areas were updated as detailed in each of these topic sections.

The Initial Study/Environmental Checklist (Appendix A) prepared for the proposed project determined that the Alpine Community Plan Update (CPU) would have either no impact or a less than significant impact associated with Geology and Soils, Hazards and Hazardous Materials (airports and vectors), Noise (airports), Population and Housing (displacement), and Transportation and Traffic (Congestion Management Program and air traffic patterns). In addition, it was determined during preparation of this Supplemental Environmental Impact Report (SEIR) that the proposed project would have either no impact or a less than significant impact associated with Land Use and Planning, all other Hazards and Hazardous Materials issue topics, Tribal Cultural Resources, and Energy. These topics are discussed in Chapter 3.0, *Other CEQA Considerations,* of this Draft SEIR. The proposed project's potential to result in significant irreversible environmental changes and the growth inducement analysis associated with population and housing are also discussed in Chapter 3.0, *Other CEQA Considerations.*

The State CEQA Guidelines Appendix G checklist questions provided in Sections 2.1 through 2.14 of this SEIR generally reflect those included in the Initial Study/Environmental Checklist (Appendix A) prepared for the NOP, which was published on August 30, 2018. In some instances, however, the checklist questions have been updated to reflect the revisions to Appendix G that were adopted and certified by the California Resources Agency in December 2018 as part of a comprehensive update to the State CEQA Guidelines. It

[1] As discussed further in Chapter 1.0, *Project Description, Location, and Environmental Setting*, of this SEIR, the baseline conditions have been updated for Air Quality, Greenhouse Gas Emissions, Wildfire, and Transportation/Traffic. All other issue areas rely on the existing conditions described in the 2011 General Plan EIR and FCI GPA EIR.

should be noted that because the Appendix G checklist questions are advisory in nature, the County is not required to adhere to the specific language in Appendix G and has the discretion to modify the checklist questions to suit the issues specific to its jurisdiction.

Lastly, as discussed further in Chapter 1.0, the County has prepared an SEIR to the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR because only minor additions or changes would be necessary to make the prior EIRs adequate to apply to the proposed Alpine CPU. As a result, this SEIR incorporates by reference these two EIRs. It should be noted that the FCI GPA EIR, which was certified in October 2016, tiered from the 2011 General Plan EIR. For a majority of issue areas analyzed, no new or more severe impacts were identified in the FCI GPA EIR compared to the 2011 General Plan EIR. Therefore, unless noted otherwise, the findings from the FCI GPA EIR are not provided in Sections 2.1 through 2.1 to reduce redundancy, as the summary of impacts from the 2011 General Plan EIR accurately captures the impacts from the FCI GPA project.

2.1 Aesthetics

This section of the Supplemental Environmental Impact Report (SEIR) describes the visual setting of the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on scenic vistas, scenic resources, visual character, and light and glare. This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to aesthetics. Table 2.1-1 summarizes the impact conclusions identified in this section.

Table 2.1-1. Aesthetics Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact	Project Cumulative Impact	Level of Significance After Mitigation
AES-1	Scenic Vistas	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
AES-2	Scenic Resources	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
AES-3	Visual Character or Quality	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
AES-4	Light or Glare	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable

Comments received in response to the Notice of Preparation (NOP) related to aesthetics and visual resources included suggestions for design guidelines to be used to minimize impacts of increased development adjacent to the Cleveland National Forest (CNF) and requests to maintain the rural and small-town nature of Alpine. These concerns are addressed and summarized in this section.

Specifically, Issues 1, 2, and 3 in Section 2.1.3, below, analyze the project's potential to damage or degrade scenic resources and visual character and quality, and identify existing regulations and proposed policies and measures to reduce impacts to these resources. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

2.1.1 Existing Conditions

This section discusses the existing visual character and quality of the Alpine CPA and the seven subareas, where applicable. It also identifies the existing visual resources that are visible from within the Alpine CPA and existing sources of light and glare in the Alpine CPA.

2.1.1.1 Community Character

San Diego County has three distinctive geographic regions that provide a backdrop for visual resources: the low-lying Coastal Plain, the mountainous Peninsular Range, and the lowlands of the Desert. Scenic resources in the higher elevation of the Peninsular Range region are plentiful, including large open spaces such as CNF, Agua Tibia Wilderness Area, San Mateo Canyon Wilderness, Palomar Mountain State Park, Cuyamaca Rancho State Park, and various County reserves and parks, as well as the large water bodies of El Capitan Reservoir, Barrett Lake, Lake Morena, Lake Cuyamaca, and Lake Henshaw.

Alpine is located within the County's mountainous Peninsular Range, situated in the foothills of the Cuyamaca Mountains. The area is rugged and diverse, ranging from densely vegetated lower drainage-ways to semi-arid hilly terrain, to the peaks of the Viejas and El Cajon Mountains. Interstate (I-) 8 bisects the community. Existing development has a rural character typical of light agricultural activities practiced in conjunction with residential uses. The mountainous setting in which Alpine is located greatly influences the visual character and scenic resources in the community, which include features such as Viejas Mountain, El Cajon Mountain, El Capitan Reservoir, Loveland Reservoir, Poser Mountain, and Palo Verde Lake.

2.1.1.2 Scenic Vistas and Scenic Resources

Certain areas in the County have been designated as Resource Conservation Areas (RCAs) for the purposes of informing future planning decisions (see Figures 2.1-1a and 2.1-1b). RCAs include, but are not limited to, areas of aesthetic quality, groundwater problem areas, coastal wetlands, native wildlife habitats, construction quality sand areas, littoral sand areas, astronomical dark skies areas, scenic geologic formations, and significant archaeological and historical sites. The following RCAs have been identified in the prior EIRs for the Alpine CPA. These RCAs would be carried forward into the proposed project as identified in the prior EIRs, and no changes are proposed to this list.

- **El Capitan Reservoir and El Cajon Mountain.** El Cajon Mountain is valuable as a visual landmark and for wildlife habitat.
- **Viejas Mountain.** Viejas Mountain is a visual landmark and is valuable for its excellent example of undisturbed broad-leaf and narrow-leaf chaparral.
- **Sweetwater River Canyon and Adjacent Archaeological Resource Areas.** This canyon is valuable for its undisturbed habitats, including chaparral, virgin riparian woodland, and oak woodland as well as a pristine perennial stream and aquatic ecosystems. It also offers a dramatic view that can be partially seen from an (I-8) roadside viewpoint.
- **Loveland Reservoir and Surrounding Visual Resources.** Loveland Reservoir serves as a rest stop for migratory waterfowl, and its surrounding environs contain habitat used by the protected golden eagle and other raptorial birds, as well as large mammals.
- **Horsethief Creek/Pine Valley Creek Region.** Portions of this isolated area are suitable habitat for several species of rare plants. It is also valued for its high visual resource and archaeological potential.
- **Gaskill Peak Region.** Habitats on this mountain are inhabited by large mammals and raptorial birds as well as plants. It is also valued as a visual resource.
- **Bells Mountain.** This mountain is valued as a visual landmark and for its high archaeological resource potential.

Figures 2.1-2a and 2.1-2b identify the locations of these features and the locations of key views. Figures 2.1-3 through 2.1-7 provide representative photographs of visual resources from key views in the Alpine CPA.

2.1.1.3 Scenic Highways and Corridors

A freeway, highway, road, or other vehicular right-of-way along a corridor with considerable natural landscape and a high aesthetic value would have the potential to be eligible for a scenic highway designation. State Scenic Highways are designated by the California Department of Transportation. There are no designated State Scenic Highways in the Alpine CPA. The nearest designated State Scenic Highways are State Route (SR-) 125 and SR-52, each of which is approximately 11 miles to the southwest and northwest, respectively, from Alpine. The majority of the entire length of I-8 from the eastern border of California to its western terminus in the community of Ocean Beach is considered an eligible State Scenic Highway, including the segment of I-8 that travels through Alpine, which includes views of Viejas Mountain, El Capitan Reservoir, Peutz Valley, and the Sweetwater River.

In addition to Section 2.1.1.1 above, the prior EIRs identify I-8 from the El Cajon city limits in the west to the Imperial County line in the east as part of the County Scenic Highway System Priority List. This includes the portion of I-8 that traverses Alpine. Other roadways identified on the County Scenic Highway System Priority List that fall within the Alpine CPA include Japatul Road from Lyons Valley Road to I-8, Honey Springs Road from SR-94 to Lyons Valley Road (only the northern portion of this segment falls within the Alpine CPA), Dehesa Road from the El Cajon city limits to Tavern Road, and Mountain View Road from La Cresta Boulevard to Harbison Canyon Road.

Only a handful of corridor studies have been initiated due to lack of funding, and no routes have been officially designated as a County Scenic Highway. Currently, the County Scenic Highway System List serves as a source for identifying resources to implement the scenic highways program. Finally, the existing Alpine Community Plan identifies three scenic view corridors from I-8: (1) views toward El Capitan Reservoir, (2) east and west views of Viejas Mountain, and (3) south views along Sweetwater River (see Figures 2.1-2a and 2.1-2b).

2.1.1.4 Visual Character and Quality

Aesthetic experiences can be highly subjective and vary from person to person; therefore, when feasible, it is preferable to evaluate aesthetic resources using a process that strives to objectively identify the visual features of the area, their importance, and the sensitivity of the associated viewers. The proposed project–related changes to the aesthetic character of the project area and surrounding area are identified and qualitatively evaluated based on the extent of the modification to the existing physical conditions and based largely on viewer sensitivity to the modification. For the purposes of this analysis, *views* refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic scene from an area, and *visual quality* is evaluated based on the relative degree of vividness, intactness, and unity within a landscape.

Viewer sensitivity is based on the visibility of a scenic resource, the proximity of viewers to the resource, the relative elevation of viewers to the resource, the frequency and duration of views, the number of viewers, and the types and expectations of the individuals and viewer groups. Generally, visual sensitivity increases as the total number of viewers, frequency, and duration of viewing activities increase.

An evaluation of the project area and the potentially affected environs, along with a review of public scoping comments, served to identify indicators of public sensitivity to changes to views. The range and

quality of public views of the project area were determined by reviewing street maps and designated vista areas in the Alpine Community Plan, conducting site visits, and reviewing photos of areas within or adjoining the project area. Consideration was also given to how viewers would experience the land use changes as a result of the proposed project due to varying degrees of visibility and distance from the project area, as well as the structures, vegetation, topographic features, or other intervening obstacles that were present.

The visual character and quality of a site and its surrounding area are defined by land uses, historical resources, community design, architectural themes, natural resources, and any other human-made or natural features that give the area its overall look and feel. Distinct features such as terrain and topography, land uses such as agriculture, the presence of a distinct town center, rural development densities, and designated open space or other natural features are examples of factors that contribute to the visual character and quality of a site and its surrounding area.

The visual character and quality of the Alpine CPA are typical of a predominantly residential small town in the semi-rural areas of San Diego County. Structures rarely exceed two stories in height and largely feature traditional architectural styles. Commercial uses consist mostly of neighborhood-serving retail establishments, such as a grocery store and restaurants, contained within strip commercial centers and are largely concentrated along Alpine Boulevard. There are a few multi-family residential uses, which again, tend to be located on or near Alpine Boulevard. Industrial uses are also limited and concentrated in the northwestern region of the Alpine CPA. The rest of the community comprises largely suburban or semi-rural residential development. However, because the community is nestled in the foothills of the Peninsular Ranges with relatively hilly topography, the development pattern does not follow a grid, but instead consists of a more organic pattern with streets that meander over or around hillsides and down through valleys.

There are some pockets of suburban residential development, such as the centrally located Crown Hills neighborhood off of Tavern Road/Victoria Park Terrace, north of I-8, or the Sundance neighborhood south of I-8 and east of South Grade Road. These neighborhoods comprise evenly spaced medium or large single-family homes featuring the same architectural style and uniform setbacks and lot sizes. Homes are all oriented toward the street and include landscaping typical of suburban development such as grass lawns, ornamental trees, and fencing. Much of the Alpine CPA, however, features a much less dense residential development pattern. Typical of more rural development, houses are spread out farther away from each other and contain varying architectural styles, setbacks, landscaping, etc. Again, because of the mountainous topography, development is interrupted by canyons or hilly areas.

The specific visual character of each subarea is summarized below.

Subarea 1 is located to the northwest of the Tavern Road/I-8 intersection in the northwesternmost portion of the village area; this subarea consists mainly of graded, but undeveloped gravel lots, some of which provide storage space for construction equipment. This subarea is near a planned Mobility Element road, close to services located by the Tavern Road off-ramp, and adjacent to the existing Crown Hills residential development. The topography of this area of Alpine is hilly, and because of their low-profile nature, these features are not very visible from the surrounding public roadways. Other portions of this subarea are undeveloped natural open space.

Subarea 2 is concentrated along Tavern Road roughly between Ball Ranch Road and South Grade Road and undeveloped parcels abut Wright's Field to the north. The stretch of Tavern Road within Subarea 2 is a somewhat sparsely developed two-lane road with shallow or no curbs along some portions and gravel shoulders, except near Joan McQueen Middle School and Boulder Oaks Elementary School where the road

widens to allow for dedicated bike lanes and turning lanes. Overhead electrical equipment (posts and wires) is visible along the entire length. However, the streetscape is also heavily vegetated with trees or open, grassy fields lining much of the roadway. Multiple undeveloped lots front the roadway.

Other parcels in Subarea 2 are developed with low-density residential uses, which include one-story homes situated within a large lot with deep setbacks from the roadway. Various styles of fencing often enclose the residential homes. The two schools along Tavern Road—Joan McQueen Middle School and Boulder Oaks Elementary—represent a marked deviation from the predominant visual character along Tavern Road due to the presence of the larger school buildings being visible as well as the parking lots, wide driveways, and manicured lawns that front the road. The parcels north of Wright's Field comprise undeveloped, natural open space. They are currently not highly visible from public roadways.

Subarea 3 is located centrally within the Alpine CPA, east of East Victoria Drive, south of Otto Avenue, and north of I-8. The western boundary of the subarea aligns roughly with the Alpine Boulevard/Willows Road freeway overpass. Similar to Subarea 2, Subarea 3 is sparsely developed and includes low-density residential uses on large lots, with large parcels of undeveloped open space separating many of the parcels. The East Victoria Drive end of Otto Avenue is slightly more densely developed. While lots are generously sized, they are smaller than those farther east down Otto Avenue. The houses are generally closer together and situated closer to the street, with visible fencing and landscaped yards. Farther east along Otto Avenue, the streetscape becomes more heavily vegetated with trees or open space with native vegetation. Houses are set back farther and are minimally visible from the roadway.

Subarea 4 is located in the westernmost area of the Alpine CPA to the south and west of El Capitan Reservoir. The subarea encompasses an area roughly bounded by El Monte Drive on the north, Chocolate Summit Drive on the east, I-8 on the south, and the community of Lakeside on the west. The western portion of the subarea is characterized by low-density residential on large lots, comprising mostly one-story, single-family homes. The development pattern has a somewhat haphazard appearance with setbacks, architectural styles, and landscaping and fencing varying from one lot to the next. Many of the lots contain one or more outbuildings, such as stand-alone garages or sheds, and some contain equestrian facilities such as round pens or paddocks.

The middle portion of Subarea 4 is publicly owned land designated Public Agency Lands (PAL) and is not part of the subarea. However, aside from the Los Coches Creek Middle School and a church, this area contains undeveloped, naturally vegetated open space. The eastern portion of the subarea includes another small low-density residential community similar in character to the western side. The northern portion includes active agricultural production with planted fields and undeveloped open space, some of which has been graded with other areas containing natural vegetation.

Subarea 5 is located south of I-8 between the Alpine Boulevard/Willows Road and the East Willows Road overpasses. The southern boundary varies but is generally north of Palo Verde Lake and the Sweetwater River. This area is minimally developed, including only a few small pockets of low-density residential uses where, again, houses that vary in architectural styles and setbacks, etc., are situated within large lots, often with several other outbuildings with varying purposes. These pockets of residential development are interspersed between large areas of hilly and naturally vegetated open space. Three parcels within this subarea are currently part of the CNF.

Subarea 6 is Alpine's "Main Street" and Village area, centered along Alpine Boulevard between West Victoria Drive and East Victoria Drive/South Grade Road. Development within this portion of the Alpine CPA is relatively dense and comprises mostly small stand-alone commercial enterprises, such as liquor stores, restaurants, bicycle shops, gas stations, banks, auto-repair shops, and childcare centers. Various

buildings are present along this stretch of Alpine Boulevard. Generally, buildings front the road or are separated from the roadway by small parking lots. While not exceeding two stories, building heights vary from one parcel to the next and range from two full stories, buildings with parapets that give the appearance of a taller façade, to buildings with low-flat roof lines. Building styles also vary considerably. Some exhibit plain traditional architectural styles, others have more contemporary styles, and there is a distinct style reminiscent of a country village. Landscaping varies as well with most lots containing minimal vegetation, such as a few small shrubs, while others have larger ornamental trees.

Subarea 7 is located throughout the Alpine CPA but most heavily oriented in the central and southern portion of the area. Development is limited and is semi-rural and rural.

2.1.1.5 Light and Glare

The lower density, semi-rural uses in many unincorporated communities provide darker skies than that of an urban community. Because of its semi-rural nature, sources of glare and nighttime lighting are somewhat limited in the Alpine CPA. Commercial uses tend to produce more nighttime lighting than residential uses, and, therefore, nighttime lighting tends to be concentrated along Alpine Boulevard, including parking lot security lighting and building lighting. Alpine Boulevard, as well as other major thoroughfares in the community and some of the residential communities, also includes street lighting. Viejas Casino and Resort, on the eastern edge of the community, provides another major source of lighting for the casino and resort buildings as well as the outlet mall. The segment of I-8 that traverses Alpine does not contain nighttime street lighting.

Glare is a continuous or periodic intense light that is greater than the luminance to which the eyes are adapted and would have the potential to cause annoyance, discomfort, or visual impairment, and can be a nuisance or hazard. Glare commonly occurs when an object is significantly brighter in contrast to the rest of the viewshed, such as light reflecting off an expanse of glass, such as those found in commercial or industrial developments. Potentially reflective exterior building materials can affect motorists, cyclists, pedestrians, or other persons within sight of the project depending on the position of the sun, outdoor lighting, and/or building materials. There are very few sources of glare in the Alpine CPA, with typical sources limited to sunlight reflecting from car windshields.

2.1.2 Regulatory Framework

Chapter 2.1 of the prior EIRs describes the Regulatory Framework related to aesthetics and is hereby incorporated by reference. The regulatory framework discussion in the prior EIRs regarding aesthetics has not changed since adoption and is therefore not repeated here. The FCI EIR applied to 71,715 acres within nine CPAs and did not specifically discuss community design regulations. Therefore, the Alpine Design Review Guidelines, and the Alpine Village Core Form-Based Code Ordinance (Ordinance 8900) are discussed below. It should be noted that the County is currently undertaking a comprehensive update of the Land Development Code (LDC), which includes the County's Zoning Ordinance and could result in revisions to the local regulations listed below.

Applicable federal regulations include:

- National Highway System Designation Act of 1995
- National Historic Preservation Act of 1962
- Telecommunications Act of 1996

Applicable state regulations include:

- California Energy Code
- California Street and Highways Code
- State Scenic Highways Program

Applicable local regulations include:

- San Diego County Board of Supervisors Policy I-73, Hillside Development Policy
- County Community Right-of-Way Development Standards
- Design Review Guidelines
    - Adopted in 1987, the purpose of Alpine's Design Review process is to encourage development that contributes to Alpine's special character and identity as a mountain village. Design review is required for all new construction or alteration in commercial, industrial, and public/semi-public development as well as multi-family residential development zoned at a density of 7.3 or more dwelling units per acre occurring within the Alpine CPA boundaries. The design guidelines cover topics such as site planning principles, natural features, architectural character, visual linkages and landscaping guidelines, lighting guidelines, and signage. The guidelines also establish the design review application process and requirements.
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608, Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 59.101-59.115, Light Pollution Code (LPC)
- Multiple Species Conservation Program (MSCP) and the County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Biological Mitigation Ordinance (BMO)
- San Diego County Scenic Highway Program
- San Diego County Zoning Ordinance
    - Sections 5200–5212, Scenic Area Regulations
    - Section 5749, Specific Historic Districts
    - Sections 5750–5758, Community Design Review Area Regulations
    - Sections 5900–5910, Design Review Area Regulations
    - Sections 5700–5749, Historic/Archaeological Landmark and District Area Regulations
    - Section 6320, Amended by Ord. No. 9620, Humidity, Heat, Cold and Glare
    - Section 6322, Amended by Ord. No. 7110, Outdoor Lighting
    - Section 6324, Amended by Ord. No. 9690, Lighting Permitted in Required Yard
    - Section 6980, Wireless Telecommunications Facilities

Applicable local regulations not included in or adopted after adoption of the 2011 General Plan Update are described below.

2.1.2.1 Sections 8900–8980, Alpine Village Core Regulations (Adopted July 31, 2014)

The Alpine Village Core regulations apply to the area identified in the Alpine CPA as the Village Core and are intended to preserve and promote the village character while creating a balanced automobile, bicycling, and pedestrian-friendly environment for residents, business owners, and visitors. These regulations are also intended to encourage the continuation and growth of the character of Alpine while promoting the economic development of the Alpine Village Core. These regulations establish permitted uses, development standards, design standards, and thoroughfare design standards. As noted above, the LDC is currently being updated, and the Alpine Village Core Regulations may be revised as part of that process.

2.1.2.2 Forest Conservation Initiative

The 2011 General Plan and associated certified General Plan EIR included land use map changes that excluded approximately 71,300 acres of private lands within the CNF in the unincorporated County that were formerly designated as FCI lands. The FCI was a voter-approved initiative in 1993 that required a minimum lot size of 40 acres for these lands. The FCI expired on December 31, 2010. With its expiration, the former FCI lands reverted to the land use designations of the previous General Plan (1978) in effect before the FCI was enacted. As a result, the land use designations associated with the FCI lands were not consistent with the 2011 General Plan land use designations. In addition, the land use mapping for the former FCI lands was not consistent with the General Plan Goals and Policies, and Guiding Principles. The subsequent FCI GPA and associated EIR resulted in re-designation of former FCI lands with land use categories consistent with the Guiding Principles, and Goals and Policies of the adopted 2011 General Plan. In addition, the FCI GPA included changes in land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure that the land use designations for these additional 400 acres are consistent with the changes proposed for the former FCI lands and vice versa (County of San Diego 2016).

2.1.2.3 County of San Diego General Plan Policies

The General Plan includes goals and policies intended to protect aesthetics and visual resources within the Land Use, Conservation and Open Space, Mobility, and Housing elements. These goals and policies are summarized below.

Land Use Element

Goal LU-1 is to develop a land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories. Policies LU-1.3 and LU-1.4 specifically support this goal by focusing land use designations to be consistent with community character, preserve surrounding rural areas, and support orderly and contiguous expansion of a Village area.

Goal LU-2 focuses on the conservation and enhancement of the unincorporated County's varied communities, rural setting, and character. Policies LU-2.1 and LU-2.2 address this goal by focusing on the importance of maintaining updated community plans and the relationship between the General Plan and community plans. Additionally, Policies LU-2.3 and LU-2.5 further address this goal by requiring density

and lot sizes in character with each unincorporated community and the identification and maintenance of greenbelts.

Goal LU-6 states that the built environment should be in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities. A number of policies address this goal, specific to conservation-oriented design and integrating natural features into project design, specifically Policies LU-6.2, LU-6.3, LU-6.6, and LU-6.9. Additionally, Policies LU-6.4 and LU-6.7 require that projects conserve and protect open space, protect natural resources, and preserve scenic vistas and areas.

Goal LU-10 addresses the function of semi-rural and rural lands buffering communities, protecting natural resources, fostering agriculture, and accommodating unique rural communities. Policies LU-10.1 and LU-10.2 meet this goal and require residential development in Semi-Rural areas to integrate with existing communities; provide connected and continuous streets, pathway/trail, and recreational open space networks; and require development in semi-rural and rural areas to respect and conserve the unique natural features and rural character.

Mobility Element

Goal M-2 responds to physical constraints and preservation goals by working to establish a road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character. Policy M-2.3 specifically addresses this goal through environmental sensitive road design by locating and designing public and private roads to minimize impacts to significant biological and other environmental and visual resources.

Goal M-10 addresses parking for community needs through parking regulations that service the community while enhancing community character. Policy M-10.6 meets this goal by establishing restrictions for on-street parking to retain rural character outside Villages and Rural Villages.

Conservation and Open Space Element

Goal COS-11 identifies the importance of preserving scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized. Specifically, Policies COS-11.1 and COS-11.2 meet this goal by requiring protection of scenic resources and connection of these resources. Policy COS-11.3 requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas. Additionally, Policies LU-4 and LU-5 require coordination with state and federal agencies, jurisdictions, and private and public power agencies to protect scenic resources and corridors, avoid impacts to visually sensitive areas, and design public improvements within visually sensitive areas to blend into the landscape.

Goal COS-12 preserves ridgelines and steep hillsides for their character and scenic value. Policies COS-12.1 and COS-12.2 meet this goal by restricting development and protecting these features through semi-rural and rural designations and locating structures down and away from ridgelines.

Goal COS-13 establishes the preservation of dark skies as they contribute to rural character and are necessary for the local observatories. This goal is met through implementation of Policies COS-13.1, COS-13.2, and COS-13.3, which restrict light and glare from development projects in semi-rural and rural lands, minimize light pollution specifically in the vicinity of Palomar and Mount Laguna Observatories, and require coordination with adjacent federal and state agencies, local jurisdictions, and tribal governments.

Housing Element

Goal H-2 aims to establish well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing. Policy H-2.1 meets this goal by requiring that development in existing residential neighborhoods are well designed so they do not degrade or detract from the character of surrounding development consistent with the Land Use Element.

2.1.2.4 Alpine CPU Policies

Specific Alpine Community Plan Update (CPU) goals and policies in the Land Use, Mobility, and Conservation and Open Space Elements are relevant to impacts and visual resources and are summarized below.

Land Use Element

Goal LU-1 is proposed to capitalize on the economic opportunity afforded by I-8 and the regional access it provides. Policy LU-1 meets this goal by establishing commercial quadrants at the three I-8 interchanges (Tavern Road, West Willows, and East Willows).

Goal LU-7 recommends analyzing a Transfer of Development Rights (TDR) Pilot Program, and Policy LU-7.1 specifically implements a TDR Pilot Program in support of this goal.

Goal LU-8 furthers the early designation of a scenic highway system that will provide attractive and scenic travel routes within the Alpine planning area. Policy LU-8.1 refines the scenic vistas/view corridors from the current Alpine Community Plan, as documented in Section 2.1.1.3 above, to include I-8 looking north and south through Peutz Valley and east and west views of Viejas Mountains.

Mobility Element

Goal M-1 works to support a multi-modal transportation system that serves the general convenience and safety of Alpine citizens and enhances the beauty and quality of the built environment. Policies M-1.6, M-1.9, and M-1.10 encourage replacement of all trees lost during road construction/renovation projects; encourage streetscape designs that promote walkability, such as shade and benches; and support walkways in residential communities and around existing and future school sites.

Conservation and Open Space Element

Goal COS-2 encourages planting of trees to absorb carbon dioxide and provide water quality benefits through runoff retention. Policy COS-2.1 recommends exploring incentives and tax breaks to meet this goal and consideration of support for removal of non-native vegetation.

Goal COS-3 aims to create an open space system that provides connectivity for the community and wildlife and provides buffers between open space and development. Policy COS-3.1 encourages preservation/ conservation of open space corridors that connect the community of Alpine to CNF, El Capitan and Loveland Reservoirs, and Sweetwater River Basin.

Goal COS-4 recommends creation of a system of parks and natural open space preserves that provide both passive and active recreation opportunities. Specifically, Policies COS-4.1 and COS-4.2 require placement of open space areas and access in alignment with adjacent jurisdictions and located adjacent to each other in residential developments.

2.1.3 Analysis of Project Effects and Determination as to Significance

Based on guidance provided in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, and the County's Guidelines for Determining Significance – Visual Resources (County of San Diego 2007), except as provided in Public Resources Code Section 21099, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surrounding.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

2.1.3.1 Issue 1: Scenic Vistas

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County's Guidelines, the project would have a significant impact if it would obstruct, interrupt, or detract from a scenic vista that is visible from the following:

- Public road
- Trail within an adopted County or State trail system
- Scenic vista or highway
- Recreational area

Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations would result in potentially significant direct and cumulative impacts on scenic vistas. Impacts of the General Plan and FCI GPA were determined to be less than significant with implementation of mitigation measures and General Plan policies, which would require protection of scenic vistas through development design and siting, including integration of open spaces and natural resources in developments; and maintenance of lower density land use designations in areas that include scenic vistas visible from a public road, a trail within an adopted County or state trail system, a scenic vista or highway, or recreational area. The discussion of impacts related to scenic vistas from the General Plan and FCI GPA implementation can be found in Sections 2.1.3.1 and 2.1.4.1 of the General Plan EIR and 2.1.3.1 of the FCI EIR and is hereby incorporated by reference.

The proposed project would result in similar direct and cumulative impacts related to scenic vistas through future development that could affect views of locally important scenic vistas. The proposed project concentrates density in existing highly developed areas of Alpine, specifically the Village. The proposed project would allow for a greater density and increase in the number of dwelling units in Subareas 2, 4, and 6; however, Subarea 5 would have a reduction in dwelling units. The land use designation changes would involve changing existing Village Residential (VR-4.3, VR-2.9, VR-2) land uses

to a higher density (VR-10.9, VR-7.3) and reclassifying a small area from Village Residential to Semi-Rural Residential (SR-1) or Neighborhood Commercial (C-3). Subarea 4, located in the northwestern portion of the CPA and north of I-8, would have an increase in density through the re-designation of existing Semi-Rural Residential (SR-1, SR-2) to uniformly SR-0.5 land use designations. Subarea 6, located in Alpine Village and south of I-8, would result in an increase in density as the land use designations for the area would be re-designated from Residential Commercial (RC) to Village Core Mixed Use (VCMU) to provide additional high-density residential options and flexibility in commercial options. An increase in density would have the potential to obstruct, interrupt, or detract of a scenic vista. For example, a new housing development would have the potential to interrupt the view of a large open space area from an existing roadway.

One new roadway segment, New Road 26, is proposed to be added to the Mobility Network Element. New Road 26 would be within Subarea 5, along Viejas Creek Trail, from Alpine Boulevard to Via Dieguenos. New infrastructure would have the potential to interrupt or detract from a scenic vista that previously did not include infrastructure.

The proposed project would allow for increased building height and scale within Subareas 2, 4, and 6 as compared to the prior EIRs, which in turn would have the potential to affect views of Viejas Mountain (a locally important scenic vista). The proposed project includes Policy LU-8.1, which requires the protection of locally important scenic vistas, including corridors along I-8, Viejas Mountain, and El Cajon Mountain. Despite these policies, this impact is **potentially significant** because the land use designations of the proposed project and the resulting development would have the potential to obstruct, interrupt, or detract from a scenic vista.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, state, and local regulations identified in Section 2.1.2, *Regulatory Framework*, that are applicable to the Alpine CPU protect visual resources, including CEQA, RPO, and design guidelines. Through CEQA review of discretionary projects, the County is able to minimize impacts to scenic vistas. The County has prepared guidelines specifically for reviewing impacts to scenic vistas.

Although not specific to scenic vistas, the County Zoning Ordinance contains several regulations that address aesthetic character and resources, as described in Section 2.1.2.3, and implement the design and scenic preservation guidelines. The Scenic Area Regulations of the County Zoning Ordinance serve to regulate development in areas of high scenic value in order to exclude incompatible uses and structures, and preserve and enhance the scenic resources in adjacent areas. Therefore, the existing regulations and processes aid in reducing impacts to scenic vistas but are not comprehensive to this issue.

Summary

The proposed project has the potential to create more severe impacts to scenic vistas associated with increased density, new road infrastructure, and building height and scale as compared to the FCI EIR. Goals and policies proposed in the Alpine CPU could help reduce impacts from future development projects implemented under the proposed project. There are also numerous regulations in place that will continue to apply to subsequent projects that are discretionary, including the County's Guidelines for Determining Significance – Visual Resources, scenic designators, and the Community Design Review Board. Despite these policies and regulations, impacts would be **potentially significant** and specific implementation programs are identified as mitigation (**Impact-AES-1**).

2.1.3.2 Issue 2: Scenic Resources

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance – Visual Resources, the proposed project would have a significant impact if it would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of a State or County Scenic Highway, or localized area, including, but not limited to, landmarks (designated), historic resources, trees, and rock outcroppings.

Impact Analysis

The prior EIRs determined that the proposed land use designations would allow development to occur with the potential to result in significant direct and cumulative impacts on scenic resources. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan goals and policies, which require protection of scenic resources through development design and siting, including integration of open spaces and natural resources in developments; and maintenance of lower density land use designations in areas adjacent to scenic resources. The discussion of impacts related to scenic resources from implementation of the General Plan and FCI GPA can be found in Sections 2.1.3.2 and 2.1.4.2 of the General Plan EIR and 2.1.3.2 of the FCI EIR and is hereby incorporated by reference.

As discussed above, I-8 is the only eligible State Scenic Highway designated on the County Scenic Highway System Priority List (2007) in the vicinity of the land use designation changes that would occur under the proposed project. There are no other eligible or designated State Scenic Highways in the vicinity of the Alpine CPA and other designated County highways on the Priority List in the area do not include views of the seven subareas where land use designation changes would occur, largely due to intervening topography and vegetation. However, the project proposes land use designations allowing greater densities adjacent to the I-8 corridor than are allowed under the General Plan.

Implementation of these densities has the potential to result in the removal or substantial adverse change of features contributing to the existing visual character within viewsheds available from I-8, including the removal of trees and the potential removal of rock outcroppings during grading activities, particularly in the eastern portion of the Alpine CPA. As such, similar to the prior EIRs, the proposed project has the potential to result in a significant adverse impact on scenic resources. As described in Section 2.1.3.1, Issue 1, the General Plan and Alpine CPU include goals and policies that protect scenic resources, and all of the policies listed for Issue 1 are also applicable to scenic resources. Implementation of these densities has the potential to result in the removal or substantial adverse change of features contributing to the existing visual character within viewsheds available from I-8 resulting in a **potentially significant impact**.

Federal, State, and Local Regulations and Existing Regulatory Processes

As described in Section 2.1.3.1 above, the existing regulations and processes that are relevant to scenic resources are the same as those documented for scenic vistas. These regulations and processes indirectly assist with preservation of scenic resources, except for implementation of the CEQA process for discretionary projects.

Summary

The proposed project has the potential to create more severe impacts to scenic resources as a result of the removal or substantial adverse change of features contributing to the existing visual character within viewsheds available from I-8 as compared to the prior EIRs. Goals and policies from the current General

Plan and proposed in the Alpine CPU could help reduce impacts from future development project implemented under the proposed project. There are also numerous regulations in place that will continue to apply to subsequent projects that are discretionary, including the County's Guidelines for Determining Significance – Visual Resources, scenic designators, and the Community Design Review Board. Despite these policies and regulations, impacts to scenic resources would be **potentially significant (Impact-AES-2)** .

2.1.3.3 Issue 3: Visual Character or Quality

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance – Visual Resources, the proposed project would have a significant impact if it would substantially degrade the existing visual character or quality of the site and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials) or by being inconsistent with applicable design guidelines.

Impact Analysis

The prior EIRs determined that some proposed land use designations would result in increased development densities in certain rural areas that could in turn adversely affect or degrade the existing visual character or quality of a community due to incompatibility, substantial change to community character, or alteration or loss of a community's visual resources. Direct and cumulative impacts were determined to be significant and unavoidable even with County regulations, ordinances, General Plan goals and policies, and mitigation measures. The discussion of impacts related to visual character and quality from implementation of the General Plan and FCI GPA can be found in Sections 2.1.3.3 and 2.1.4.3 of the General Plan EIR and 2.1.3.3 of the FCI EIR and is hereby incorporated by reference.

The land use designation changes occurring as part of the proposed project would allow for an increase in density of residential development within Subareas 2, 4, and 6, the implementation of which would result in considerable alteration of the visual character and quality of the subareas. The Alpine CPA is defined by its small-town character currently consisting largely of semi-rural residential uses. Architecture tends to be low profile with most structures remaining within one- to two-story height limits and containing varying, but relatively traditional styles. Streetscapes also reflect this semi-rural character with relatively narrow road widths, lined with mature trees, gravel shoulders instead of curbs or sidewalks, and considerable variations in setbacks for structures. There are a few pockets of more suburban residential neighborhoods with more uniform development patterns, including houses fronting the street, consistent setbacks, and curbed streets with sidewalks. Multi-family housing is even rarer in the community.

To accommodate the densities proposed for the proposed project, a more suburban development pattern would occur with a focus on residential density close to existing or planned services and concentrated in existing highly developed areas of Alpine, specifically the Village. Land use designations within Subareas 1, 3, and 7 remain unchanged from the current General Plan. The proposed project would allow for a greater density and increase in the number of dwelling units in Subareas 2, 4, and 6; however, Subarea 5 would have a reduction in dwelling units. In Subareas 2 and 4, a denser development pattern would occur with implementation of VR-7.3, VR-10.9, and VCMU where land use designations currently allow for lower density residential uses. For example, existing land use designation VR-2 would allow for two dwelling

units per acre while proposed land use designation VR-10.9 would allow for 10.9 dwelling units per acre, potentially more than five times greater density on 1 acre of land. Subarea 5 would result in a slight decrease in residential density than what was planned in the current General Plan, including maintaining a lower density buffer to the CNF.

Subarea 6 includes an area centered around the Tavern Road/Alpine Boulevard intersection, an area centered along Alpine Boulevard between West Victoria Drive and South Grade Road, and an area between I-8 and Alpine Boulevard between East Victoria Drive and the Alpine Boulevard overpass. The western two areas in Subarea 6 would be re-designated from General Commercial to VCMU uses. These areas already have an urban development pattern, but would experience greater density than currently exists; however, there would be no substantial change in the existing development pattern in this area over that which would have occurred under the General Plan. The eastern area of Subarea 6 would be re-designated from Rural Commercial to VCMU. This portion of Subarea 6 is currently sparsely developed; as with the other subareas, there would be a substantial change in the existing development pattern in this area—from a more rural character to a suburban or urban character.

Uniform lot and structure sizes, greater lot coverage, consistent setbacks and massing, and similar architectural styles would become more common. Building heights would also increase under the higher VR residential designations (for example, VR-10.9 or the VCMU designations), including development of three-story multi-family housing complexes. Streetscapes would likely be altered to reflect a more suburban character as well, with curbs and sidewalks becoming more common and potentially larger intersections with new traffic signals being required to accommodate the increased traffic that would occur if higher density development is implemented.

Four roadway segments are proposed to be removed from the existing Mobility Element Network: New Road 14 (from Tavern Road to West Victoria Drive), New Road 18 (from Alpine Boulevard to Eltinge Drive), New Road 23 (from Victoria Circle to East Victoria Drive), and El Monte Road (from Lakeside community boundary to El Capitan Reservoir). One new roadway segment, New Road 26, is proposed to be added to the Mobility Network Element. New Road 26 would be located within Subarea 5, along Viejas Creek Trail, from Alpine Boulevard to Via Dieguenos.

These changes to the visual character of the community would result in conflicts with the existing visual elements that define the visual quality of the area, including the introduction of new styles, setbacks, density, and building materials. Prior to the application of existing relevant regulations and General Plan policies and mitigation measures, the proposed project has the potential to result in adverse impacts on the visual character and quality of the Alpine CPA.

Even with implementation of General Plan policies, the prior EIRs mitigation measures, and proposed Alpine CPU policies, and because the prior EIRs did not anticipate the densities being proposed in the Alpine CPU, impacts related to visual character and quality with implementation of the proposed project would be more severe than those identified. Implementation of these General Plan policies, the prior EIRs mitigation measures, and the Alpine CPU policies would reduce the proposed project's impacts associated with visual character or quality but would remain **potentially significant** and mitigation would be required.

Federal, State, and Local Regulations and Existing Regulatory Processes

As described in Section 2.1.3.1 above, visual character and quality are currently addressed through many of the same regulations and processes. For visual character, those regulations that relate to preservation of the natural environment (such as RPO) have greater relevance in rural communities, such as Alpine.

Those regulations that relate specifically to the built form of a community (such as design review designators and guidelines) are directly relevant to visual character and quality. Additionally, the Zoning Ordinance contains additional controls beyond those discussed under Section 2.1.3.1 that relate to visual character, including density, size, massing, coverage, scale, color, architecture, and building materials requirements.

Summary

The proposed project would not reduce impacts to visual character and quality below a level of significance with implementation of General Plan policies, Community Plan policies, and the prior EIRs mitigation measures. Numerous regulations are in place that will continue to apply to subsequent projects that are discretionary, including the County's Guidelines for Determining Significance – Visual Resources, scenic designators, and the Community Design Review Board. Implementation of policies, regulations, and mitigation measures would further reduce impacts associated with visual character or quality, although not to below a level of significance; therefore, a **potentially significant** direct impact would occur and mitigation would be required **(Impact-AES-3)**.

2.1.3.4 Issue 4: Light and Glare

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance – Dark Skies and Glare, the proposed project would have a significant impact if it would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations in the General Plan and FCI GPA would result in potentially significant direct and cumulative impacts related to light and glare. The discussion of impacts related to light and glare from implementation of the General Plan and FCI GPA can be found in Sections 2.1.3.4 and 2.1.4.4 of the General Plan EIR and 2.1.3.4 of the FCI EIR and is hereby incorporated by reference. Impacts were determined to be significant and unavoidable even with implementation of mitigation measures and General Plan policies. The mitigation and policies would help reduce impacts related to light because they establish lighting regulations designed to minimize impacts on sensitive areas and community character including restricting or prohibiting outdoor lighting within certain land use designations or within specified distances from the observatories.

Future development occurring under implementation of the proposed project would cause glare impacts if it would result in the installation of highly reflective building materials that create glare or does not conform to applicable federal, state, or local regulations related to glare. Reflective building materials are commonly used in office professional land uses to provide office windows and in commercial land uses to display goods or advertisements in store fronts. The land use designation changes occurring under the proposed project mostly involve residential land uses, which generally do not make use of large expanses of reflective surfaces. As such, glare impacts related to implementation of the proposed project would be less than significant.

Daytime lighting would not result in a substantial new source of light or result in light pollution or light trespass because these conditions do not normally occur during the day when light is plentiful. However, excessive nighttime lighting would have the potential to result in light pollution, also called skyglow,

which is the haze of light that surrounds highly populated areas and is the result of brightening of the night sky from both artificial (outdoor) and natural (atmospheric and celestial) light. Skyglow reduces the ability to see stars and other features of the nighttime sky, which is of particular importance to the Palomar Mountain and Mount Laguna Observatories located in San Diego County. Light pollution interferes with operation of the observatory telescopes, which can detect the faintest galaxies when dark skies are available. Excessive lighting would have the potential to also have an adverse impact on wildlife, as discussed in Section 2.4, *Biological Resources*.

Artificial lighting components that can contribute to skyglow include roadway/walkway lighting, security lighting, decorative and landscape lighting, building lighting (including residential, commercial, and industrial), and site lighting. Lighting of vertical surfaces such as billboards, signs, buildings, and landscaping is especially problematic, because the light is often emitted upward into the atmosphere, resulting in uplight and ultimately increased skyglow. Areas with rural residential development would have the least lighting footprint of the developed areas because night lighting would be limited to security or ornamental lighting on houses and other structures, which would be spaced far apart. The highest lighting footprint would occur in areas with commercial or village residential development because these areas contain lighted signs, nighttime security lighting, and more dwelling units with nighttime lighting. Higher density areas are more likely to contain additional sources of light, such as street lights, that are not found in the more rural areas. Under existing conditions, the Alpine CPA, which has a concentration of commercial uses along Alpine Boulevard, has a greater lighting footprint in that part of the Alpine CPA and a lesser lighting footprint in the surrounding rural uses. With the density increases that would be allowed with implementation of the proposed project, up to 2,013 residential units could be added to the Alpine CPA, which would result in a substantial new source of nighttime lighting. The eastern portion of the Alpine CPA falls outside and west of the 15-mile radius of the Mount Laguna Observatory, which is the area most critical for light pollution to be minimized (identified as Zone A in the San Diego County LPC). In addition, Alpine has identified dark skies as a contributing part of their community character.

As highlighted in Section 2.1.2.3 above, a number of County zoning regulations address light standards. Additionally, mitigation measures from the prior EIRs, including Aes-4.1 and Aes-4.2, would also be implemented to reduce impacts associated with light or glare. The measures would reduce impacts related to light because they establish lighting regulations designed to minimize impacts on sensitive areas and community character including restricting or prohibiting outdoor lighting within certain land use designations or within specified distances from the observatories. However, despite the Zoning Ordinance regulations, General Plan goals and policies aimed at light trespass and spillover, and mitigation measures, given the magnitude of the potential development that would occur under implementation of the proposed project, impacts related to nighttime lighting with implementation of the proposed project would be more severe than those identified in the prior EIRs. Implementation of these policies and the prior EIRs mitigation measures would reduce the proposed project's impacts associated with light but not below a level of significance; impacts would remain **potentially significant** and mitigation would be required.

Federal, State, and Local Regulations and Existing Regulatory Processes

The San Diego County LPC and Zoning Ordinance performance standards minimize light pollution and light trespass. The intent of the LPC is to restrict the permitted use of outdoor light fixtures emitting undesirable light into the night sky, which can have a detrimental effect on astronomical research. The LPC sets restrictions on illuminations sources, shielding, and hours of operation. Any permit required by the County for work involving outdoor light fixtures must submit evidence that the proposed work will comply with the LPC. Section 6322 of the Zoning Ordinance reduces light pollution by controlling

excessive or unnecessary outdoor light emissions that produce unwanted illumination of adjacent properties by restricting outdoor lighting usage. Sections 6324 and 6326 of the Zoning Ordinance establish limitations on outdoor lighting. Additionally, Section 1.10 of the County's MSCP Subarea Plan requires uses within or adjacent to MSCP Preserves to be minimized and shielded. Furthermore, the General Plan promotes the preservation of dark skies that is necessary for local observatories and to contribute to the rural character of a community. Policies COS-13.1, COS-13.2, and COS-13.3 are applicable to the proposed project (see Section 2.1.2.3).

Summary

The proposed project would have the potential to result in increased light and glare within the CPA that would adversely affect nighttime views. While existing County policies and regulations are intended to minimize light and glare, including the prior EIRs mitigation measures, these programs in place do not reduce the impacts to below a level of significance. As such, implementation of the proposed project would result in **potentially significant** impacts (**Impact-AES-4**) related to light and glare effects and dark skies.

2.1.4 Cumulative Impacts Analysis

The geographic scope of the cumulative impact analysis for aesthetics includes the communities that surround Alpine, including Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura because the surrounding communities have somewhat similar character and may also be affected by the land use designation changes.

The geographic scope would also include the Viejas Reservation, which is within the Alpine CPA but is not within the jurisdiction of the County. For the issue of lighting, it would also include any area within the 15-mile radius of the Mount Laguna Observatory, which is the area most critical for light pollution to be minimized (identified as Zone A in the San Diego County LPC).

2.1.4.1 Issue 1: Scenic Vistas

A cumulative impact would occur on scenic vistas if development associated with cumulative projected growth within the Alpine CPA or directly surrounding community combined with the proposed project would result in the obstruction, interruption, or detraction of scenic vistas. Future growth within and adjacent to the Alpine CPA would result in denser or taller development than currently exists within the vicinity of scenic vistas and, thus, would have the potential to obstruct or detract from a scenic vista. Therefore, as identified in the prior EIRs, the cumulative projects in communities adjacent to the Alpine CPA would have the potential to result in a significant cumulative impact.

Cumulative projects located in the geographic scope would have the potential to result in a cumulative impact to scenic vistas if, in combination, they would result in the obstruction, interruption, or detraction of a scenic vista. Other communities would be subject to the General Plan and FCI GPA and have existing Community Plans, which regulate the protection of scenic vistas. Development on tribal lands within the County also has the potential to result in the impacts to scenic vistas. For example, a new casino, hotel, concert venue, and theatre are proposed on the Viejas Reservation in the Alpine CPA. Development on this reservation would have the potential to obstruct, interrupt, or detract from the public view of Viejas Mountain and scenic ridgelines in the Alpine CPA. Therefore, the cumulative projects in the region would have the potential to result in a significant cumulative impact related to scenic vistas.

As described above in Section 2.1.3.1, the land use designations within the proposed project would have the potential to result in the obstruction, interruption, or detraction of a scenic vista as a result of future

development activity. In combination with other cumulative projects, the proposed project would have the potential to result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-AES-1**).

2.1.4.2 Issue 2: Scenic Resources

Cumulative projects located within and near the Alpine CPA would have the potential to result in a cumulative impact on scenic resources if, in combination, they would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area, such as a landmark (designated), historic resource, trees, or rock outcropping. Similar to the proposed project, future development would be constructed in locations that fall within the viewsheds of County of San Diego Scenic Highway System Priority List. These projects have the potential to remove or result in an adverse change to resources that contribute to the scenic value of the viewshed, which would result in a significant cumulative impact from future growth and development within the cumulative study area.

As discussed above, the proposed project also has the potential to remove or adversely affect scenic resources within a designated viewshed. The land use changes that would occur under the proposed project would also have the potential to result in damages to scenic resources, resulting in a significant impact. Therefore, similar to the prior EIRs, the combination of future growth and development in the adjacent communities with the proposed project would have the potential to result in a cumulatively considerable impact on scenic resources. However, General Plan policies identified in Section 2.1.2.3 and the prior EIRs mitigation measures Aes-1.2 and Aes-1.4 through Aes-1.9 identified in Appendix B would be implemented, which would reduce impacts to less than significant levels. Impacts on scenic resources would be similar to those identified in the prior EIRs and would **not be cumulatively considerable**.

2.1.4.3 Issue 3: Visual Character or Quality

Future development located in the Alpine CPA and surrounding area would have the potential to result in a cumulative impact on visual character or quality if, in combination, they would substantially degrade the existing visual character or quality of the site and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area. As discussed in the prior EIRs, the nearest communities of Descanso and Crest-Dehesa also have the potential to accommodate more intensified development within their town centers, which would result in a potentially significant cumulative impact on the visual character or quality of the area.

The project proposes land use changes that would facilitate higher density development, which would result in more severe significant impacts on visual character and quality of the area as compared to the prior EIRs. When combined with the future growth and development in the adjacent communities, this would result in degradation of the visual character and quality of the area surrounding the Alpine CPA as well. The General Plan policies identified in Section 2.1.3.2 and the prior EIRs mitigation measures would be implemented, which would help reduce impacts related to visual character and quality. However, even with implementation of mitigation measures and General Plan policies, the proposed project's contribution to this impact would be cumulatively considerable. In addition, because the proposed project would increase density beyond what was anticipated in the General Plan and FCI GPA, impacts related to visual character and quality would be more severe than those identified in the prior EIRs and would be considered a potentially significant cumulative impact of the proposed project. In combination with other cumulative projects, the proposed project would have the potential to result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-AES-2**).

2.1.4.4 Issue 4: Light and Glare

The construction and operation of cumulative projects located in the Alpine CPA or surrounding area would have the potential to result in a new source of glare from new development or redevelopment that requires night lighting, such as security lighting in commercial areas, or is constructed with materials that would result in glare, such as expanses of glass on office buildings. Impacts from glare are generally localized and not cumulative in nature; therefore, a significant cumulative impact related to glare would not occur. However, cumulative projects have the potential to introduce substantial new sources of nighttime light pollution in the area, which would result in a potential lighting impact on the Mount Laguna Observatory. Therefore, cumulative impacts from future growth and development within the cumulative study area would be significant.

The proposed project includes land use changes that would enable more development than currently exists within the Alpine CPA. When combined with future development in the adjacent community, the development could produce a substantial new source of nighttime lighting in the cumulative study area and the project's contribution to this impact would be cumulatively considerable. The General Plan policies and the prior EIRs mitigation measures (Appendix B) would be implemented, which would help reduce impacts related to nighttime lighting. However, even with implementation of mitigation measures and General Plan policies, the proposed project's contribution to this impact would be cumulatively considerable. In addition, because the proposed project would increase density beyond what was anticipated in the General Plan or FCI GPA, impacts related to dark skies would be more severe than those identified in the prior EIRs, and would be considered a potentially significant cumulative impact of the proposed project. In combination with other cumulative projects, the proposed project would have the potential to result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-AES-3**).

2.1.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the Alpine CPA would result in potentially significant direct and cumulative impacts to scenic vistas, visual character or quality, and light and glare, and less than significant direct and cumulative impacts to scenic resources.

Impact-AES-1: Have a Substantial Adverse Effect on a Scenic Vista. The proposed project has the potential to create more severe impacts to scenic resources associated with increased building height and scale as compared to the prior EIRs. This would be considered a significant impact.

Impact-AES-2: In Non-urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public View of the Site and Its Surrounding. The land use designation changes occurring as part of the proposed project would allow for an increase in density of residential development within three subareas, and mobility network changes, the implementation of which would result in considerable alteration of the visual character and quality of the subareas as compared to the prior EIRs. This would be considered a significant impact.

Impact-AES-3: Create a New Source of Substantial Light or Glare that would Adversely Affect Day or Nighttime Views in the Area. Given the magnitude of the potential project development, impacts to dark skies would be more severe than those identified in the prior EIRs. This would be considered a significant impact.

Impact-C-AES-1: Result in a Cumulatively Considerable Contribution to Having a Substantial Adverse Effect on a Scenic Vista. The proposed project would cause a similar impact related to impacts to scenic resources with increased building height and scale compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AES-2: Result in a Cumulatively Considerable Contribution in Non-urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public View of the Site and Its Surrounding. The proposed project would cause a similar impact to dark skies as compared to prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AES-3: Result in a Cumulatively Considerable Contribution by Creating a New Source of Substantial Light or Glare that would Adversely Affect Day or Nighttime Views in the Area. The proposed project would cause a similar impact to visual character and quality as compared to prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.1.6 Mitigation

2.1.6.1 Issue 1: Scenic Vistas

The following prior EIRs specific mitigation measures would reduce **Impact-AES-1** and **Impact-C-AES-1**, impacts to scenic vistas, to **less than significant**. Therefore, no new mitigation measures would be required.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Aes-1.2 and Aes-1.4 through Aes-1.9 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts on aesthetic resources.

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

2.1.6.2 Issue 2: Scenic Resources

The following prior EIRs specific mitigation measures would reduce **Impact-AES-2** and **Impact-C-AES-2**, impacts to scenic resources, to **less than significant**. Therefore, no new mitigation measures would be required.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Aes-1.2 and Aes-1.4 through Aes-1.9.

Alpine Community Plan Update Mitigation Measures

No additional mitigation measures are required.

2.1.6.3 Issue 3: Visual Character or Quality

The following prior EIRs specific mitigation measures would reduce **Impact-AES-3** and **Impact-C-AES-2**, impacts to visual character or quality; however, with the scale and density allowed under the proposed land use designations of the Alpine CPU, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts on visual character or quality to below a level of significance. However, the County determined that these measures would be infeasible, as described below.

Therefore, the following mitigation measures would not be implemented:

- Require revised goals and policies to be prepared and incorporated into community plans that would severely limit the potential for development growth in order to maintain the existing visual character or quality of each community.

  Explanation: Although development has been focused to the Village areas with the proposed project, additional severe restrictions on the type or amount of development within Alpine and other community plan areas would conflict with the goals of the Housing Element and other General Plan goals for accommodating a reasonable share of regional growth.

- Comprehensively expand the Zoning Ordinance to specifically dictate the exact development type and design allowed in Alpine to avoid impacts to community character.

  Explanation: This measure would be the equivalent of preparing detailed land development master plans for the community of Alpine and would be infeasible because of the extent of the community. While the County intends to improve the Zoning Ordinance (including updating the LDC) and associated Design Review Guidelines for Alpine, preparing land development master plans for the community is not feasible.

- Approve only development that is comparable in size, scope, and use as existing development in order to avoid impacts to the visual character and quality of the County's communities.

  Explanation: This measure would be infeasible because it would result in restrictions on future development within the subareas, which were identified through the planning process as being appropriate for growth. This measure would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the proposed project, which is to accommodate a reasonable share of regional growth.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Aes-3.1 and Aes-3.2.

Alpine Community Plan Update Mitigation Measures

No additional feasible mitigation measures are available.

2.1.6.4 Issue 4: Light and Glare

The following prior EIRs specific mitigation measures would reduce **Impact-AES-4** and **Impact-C-AES-3**, impacts to nighttime views; however, with the scale and density allowed under the proposed land use designations of the Alpine CPU, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measure (and variations of this measure) was considered in attempting to reduce impacts associated with light to below a level of significance. However, the County determined that this measure would be infeasible to implement for the reasons below; therefore, it would not be implemented.

- Expand the LPC Zone A designation to encompass all of the unincorporated areas and create more stringent standards, including, but not limited to:
    - Nighttime lighting curfew of 10:00 p.m. for certain areas
    - Prohibit development requiring any night lighting within certain areas

    Explanation: This measure would result in restrictions on future development in areas identified for increased growth in the CPU because night lighting is required for safety or other reasons for development accommodated within Zone A areas such as commercial or residential development. The measure would also prohibit potential growth within subareas, which already have nighttime lighting**.** The resulting restrictions could pose safety concerns, increase development costs, and in some cases, pose restrictions so great that a particular use may not be possible. Therefore, this measure could conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the proposed project, which is to accommodate a reasonable amount of regional growth. This measure could also impede attainment of other objectives such as minimizing public costs of infrastructure and services and reinforcing the vitality and local economy of communities.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Aes-4.1 and Aes-4.2.

Alpine Community Plan Update Mitigation Measures

No additional feasible mitigation measures are available.

2.1.7 Conclusion

2.1.7.1 Issue 1: Scenic Vistas

Development allowed under the proposed project would have the potential to result in the obstruction, interruption, or detraction of a scenic vista and would be potentially significant (**Impact-AES-1**). Additionally, the proposed project would result in a potentially significant cumulative impact (**Impact-C-AES-1**). However, for the reasons described above, existing regulations and the prior EIRs mitigation measures identified in Appendix B, in combination with the RPO and County Zoning Ordinance, would mitigate direct and cumulative impacts to scenic vistas to a **below a level of significance**, similar to the prior EIRs.

2.1.7.2 Issue 2: Scenic Resources

The proposed project has the potential to create more severe impacts to scenic resources as a result of the removal or substantial adverse change of features contributing to the existing visual character within viewsheds available from I-8 and would be potentially significant (**Impact-AES-2**). Additionally, the propose project would result in a potentially significant cumulative impact (**Impact-C-AES-2**). However,

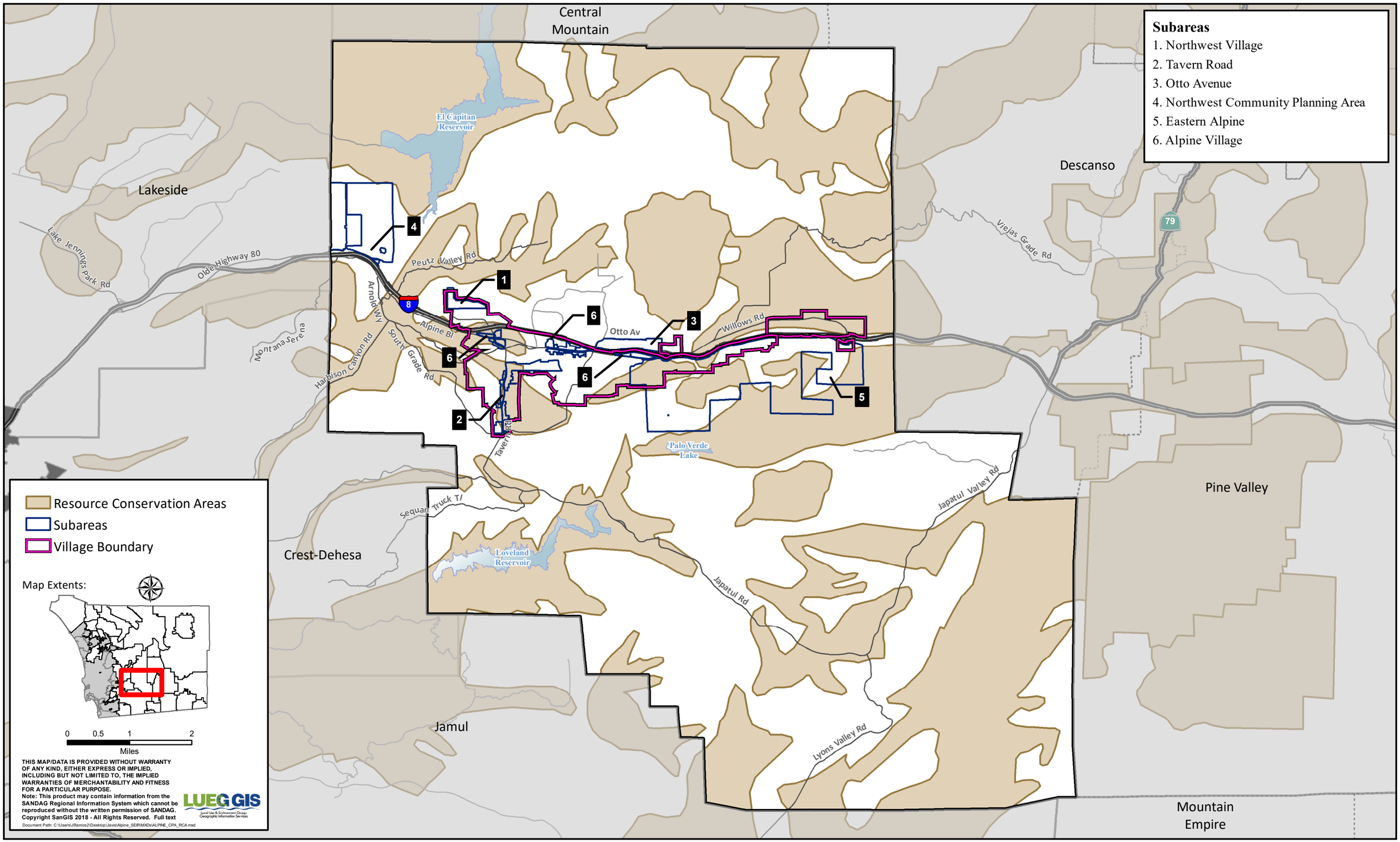
for the reasons described above, existing regulations and the prior EIRs mitigation measures identified in Appendix B, would mitigate direct and cumulative impacts to scenic vistas to a **below a level of significance**, similar to the prior EIRs.

2.1.7.3 Issue 3: Visual Character or Quality

Implementation of the Alpine CPU would allow increased development densities to occur in some areas of the community, which could result in the potential degradation of the existing visual character or quality of a community. Therefore, the proposed project would result in a potentially significant impact on visual character and quality, which would be more severe than impacts identified in the prior EIRs **(Impact-AES-3)**. Additionally, the proposed project would result in a potentially significant cumulative impact **(Impact-C-AES-2)**. General Plan policies and the prior EIRs mitigation measures identified above would reduce direct impacts on visual character and quality, but not to below a level of significance. Impacts would remain **significant and unavoidable** because the visual character of the Alpine CPA would have the potential to change with implementation of the proposed project, regardless of the zoning regulations and design review imposed.

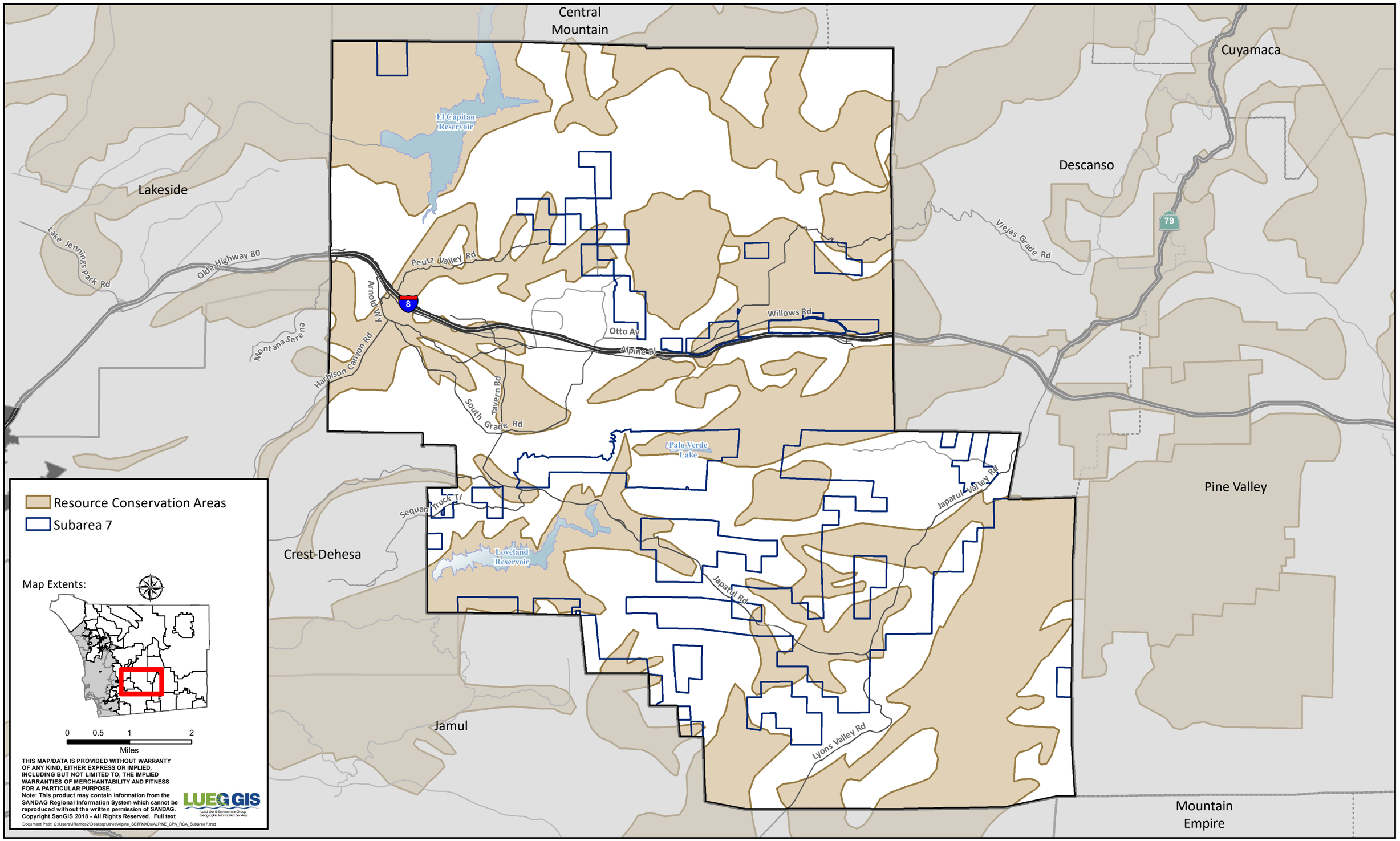
2.1.7.4 Issue 4: New Light or Glare

The proposed project would have the potential to result in increased light within the community that would adversely affect nighttime views and would affect dark skies within Zone A of the Mount Laguna Observatory. Therefore, impacts would be potentially significant **(Impact-AES-4)**. Additionally, the proposed project would result in a potentially significant cumulative impact **(Impact-C-AES-3)**. General Plan policies and the prior EIRs mitigation measures identified above, in combination with other applicable regulations including the LPC and the San Diego County Zoning Ordinance, would lessen impacts on nighttime views, but not to below a level of significance. Direct and cumulative impacts would remain **significant and unavoidable**.



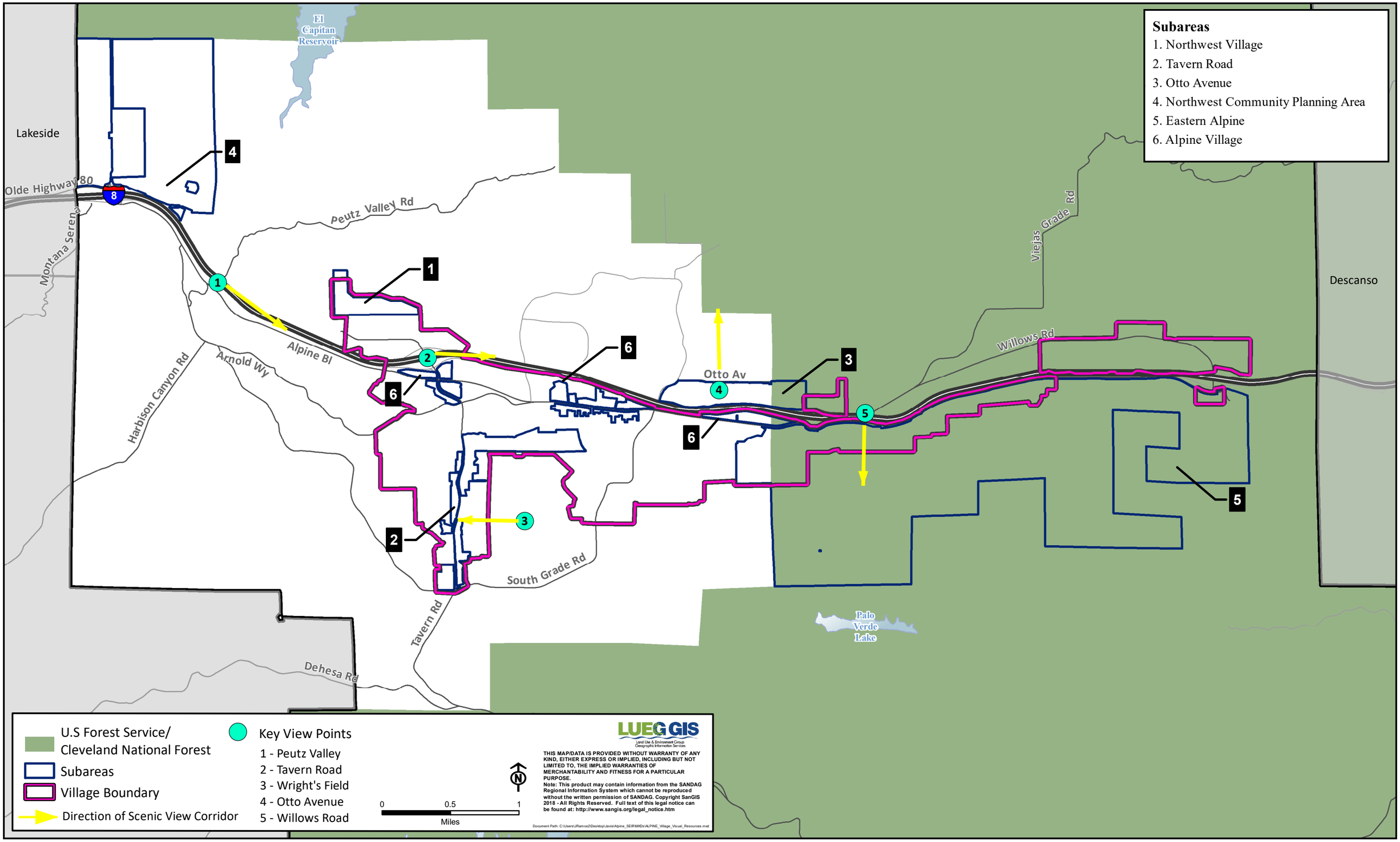
Source: SanGIS, County of San Diego, 2020

Figure 2.1-1a
Resource Conservation Areas
Subareas 1-6



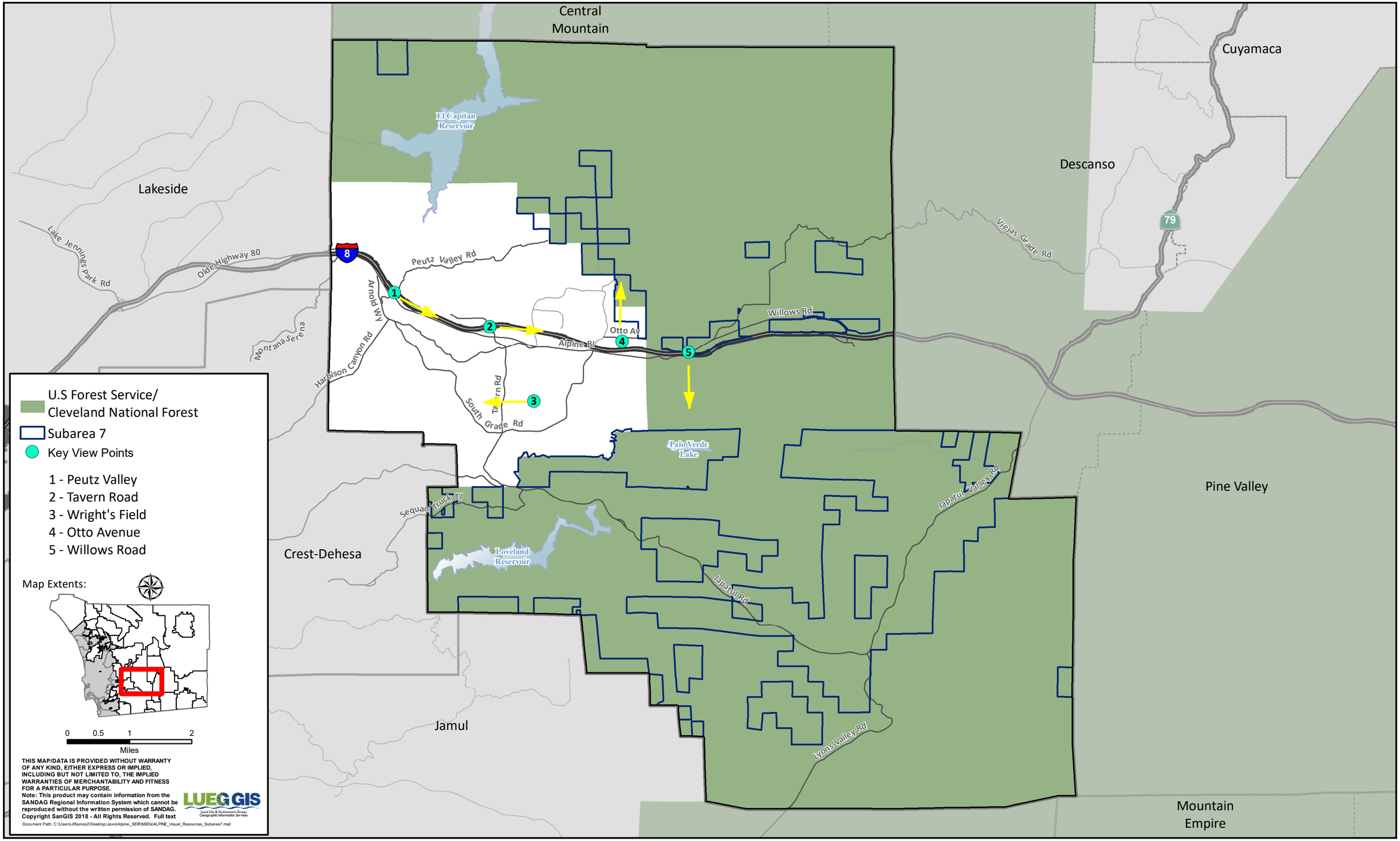
Source: SanGIS, County of San Diego, 2020

Figure 2.1-1b
Resource Conservation Areas
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.1-2a
Key View Points
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.1-2b
Key View Points
Subarea 7

Looking north from I-8

Looking south from I-8

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Source: ICF, 2018.

Figure 2.1-3
Representative Photos, Peutz Valley

North of Joan McQueen Middle School, looking north

West of Victoria Park Terrace, looking west

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Source: ICF, 2018.

Figure 2.1-4
Representative Photos, Tavern Road

Looking northwest

Looking northeast

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Source: ICF, 2018.

Figure 2.1-5
Representative Photos, Wright's Field

Looking southeast

Looking south

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Source: ICF, 2018.

Figure 2.1-6
Representative Photos, Otto Avenue

Near I-8 off-ramp, looking northwest

I-8 eastbound, near Alpine Blvd/Willows Road exit , looking south

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Source: ICF, 2018.

Figure 2.1-7
Representative Photos, Willows Road

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2.2 Agriculture and Forestry Resources

This section of the Supplemental Environmental Impact Report (SEIR) describes the agricultural and forestry resources present in the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on agricultural and forestry resources. This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative General Plan Amendment (GPA) EIR (FCI EIR) [referenced throughout the rest of this section as "prior EIRs"] as they apply to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to agricultural resources; however, forestry resources was not specifically analyzed under the 2011 General Plan EIR. Appendix G of the State California Environmental Quality Act (CEQA) Guidelines was amended to include significance criteria for forestry resources after the release date of the Notice of Preparation (NOP) for the 2011 General Plan EIR. In addition, the FCI EIR was prepared subsequent to the inclusion of the forestry resources significance criteria; thus, the FCI EIR does include an analysis of forestry resources.

This section analyzes the increase in density and change in mobility network compared to the approved densities within the prior EIRs. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs because the type and location of agricultural and forestry resources have not changed significantly since those documents were prepared. However, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

Table 2.2-1 summarizes the impact conclusions identified in this section.

Table 2.2-1. Agricultural and Forestry Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact	Project Cumulative Impact	Level of Significance After Mitigation
AG-1	Direct Conversion of Agricultural Resources	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
AG-2	Conflict with Agricultural Zoning or Williamson Act Contract	Less than Significant	Potentially Significant	Potentially Significant	Less than Significant
AG-3	Indirect Conversion of Agricultural Resources	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
AG-4	Direct and Indirect Conversion of Forestry Resources	Significant and Unavoidable[1]	Potentially Significant	Potentially Significant	Significant and Unavoidable

[1]The 2011 General Plan EIR did not include an analysis of forestry resources. Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resource after the approval of the 2011 General Plan EIR.

Comments received in response to the NOP related to forestry resources included suggestions for design guidelines to be used to minimize land use conflicts in areas within or adjacent to the Cleveland National Forest (CNF). These concerns will be addressed as part of the update to the Alpine Design Guidelines Update. No comments related to agricultural resources were received during the NOP.

Specifically, Issue 4 (see Sections 2.2.1.8, 2.2.2, 2.2.3.4, 2.2.4.4, 2.2.5, and 2.2.6.4) analyzes the proposed project's potential to directly or indirectly convert forestry resources and identifies existing regulations and proposed policies and measures to reduce impacts to these resources. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

2.2.1 Existing Conditions

This section discusses the existing agricultural and forestry resources of the Alpine CPA and the subareas. This information is gathered primarily from the California Department of Conservation (DOC), County of San Diego records of County-identified agricultural resources, and the US Forest Service (USFS).

2.2.1.1 Farmland Mapping and Monitoring Program

The DOC collects data and maps agricultural land based on soil quality, irrigation conditions, and other criteria. The best quality land is mapped as Prime Farmland followed by Farmland of Statewide Importance. Table 2.2-2 describes each Farmland Mapping and Monitoring (FMMP) Farmland category. Figures 2.2-1a and 2.2-1b depict the FMMP categories mapped in the Alpine CPA subareas. Using a 10-acre minimum mapping unit to determine resources, DOC produces these maps through the FMMP. Table 2.2-3 lists the categories of farmland designated by the FMMP and the acreage of each category present in the entire Alpine CPA. Table 2.2-4 shows the categories and acreages within each of the subareas. As shown, the Alpine CPA does not contain any land mapped as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. The farmland mapped is Farmland of Local Importance, Grazing Land, Other Land and Urban Land.

Table 2.2-2. Farmland Mapping and Monitoring (FMMP) Farmland Categories

Prime Farmland	Land with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the FMMP mapping date.
Farmland of Statewide Importance	Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the last FMMP mapping date.
Unique Farmland	Land of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the FMMP mapping date.

Farmland of Local Importance	Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In San Diego County, this category is defined as land that meets all the characteristics of Prime and Statewide, with the exception of irrigation. They are farmlands not covered by the above categories but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus).
Grazing Land	Land on which the existing vegetation is suited to the grazing of livestock. It has a minimum mapping unit of 40 acres.
Urban and Built-up Land	Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
Other Land	Land not included in any other mapping category such as low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.
Water Area	Perennial water bodies with an extent of at least 40 acres.

Source: DOC 2019; County of San Diego 2020a

Table 2.2-3. FMMP Farmland within the Alpine CPA

FMMP Category	Acreage[1, 2]
Prime Farmland	0
Farmland of Statewide Importance	0
Unique Farmland	0
Farmland of Local Importance	2,311.27
Grazing Land	1,222.65
Other Land	59,266.19
Urban Built-up Land	4,060.98

Source: County of San Diego 2020b

[1] The FMMP uses a 10-acre minimum mapping unit for all categories with the exception of Grazing Land, which uses a 40-acre minimum mapping unit, to determine resources. This system does not account for the many smaller farms that exist in San Diego County.

[2] Any discrepancies between the acreages listed in this table and the 2011 General Plan EIR are due to improvements in geographic information system (GIS) mapping.

Table 2.2-4. FMMP Farmland in Alpine CPA Subareas (acres)

Subarea	Prime Farmland	Farmland of Statewide Importance	Unique Farmland	Farmland of Local Importance	Grazing Land	Other Land	Urban Land
1	NP	NP	NP	NP	NP	57.13	0.58
2	NP	NP	NP	20.74	22.63	28.97	69.51
3	NP	NP	NP	NP	NP	101.57	13.11
4	NP	NP	NP	NP	NP	525.36	133.93
5	NP	NP	NP	NP	NP	2,074.46	9.07
6	NP	NP	NP	NP	1.79	25.47	77.67
7	NP	NP	NP	571.66	68.62	11,370.68	196.86

Source: County of San Diego 2020a

Note: The FMMP uses a 10-acre minimum mapping unit to determine resources; this system does not account for the many smaller farms that exist in San Diego County.

NP=Not Present

2.2.1.2 County-Identified Agricultural Land

The definition of an agricultural resource within the County has been broadened from the State of California's definition. The reason for broadening the definition was to capture the large number of small farms in San Diego County that the State FMMP mapping effort does not capture due to the 10-acre minimum mapping unit (County of San Diego 2015). County-identified agricultural resources include any land with an active agricultural operation (as defined in the County's guidelines), land that is designated and that meets the definition of an Important Farmland Category as defined in the DOC's FMMP, or any vacant site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses.

Data sources used to identify agricultural resources in San Diego County include FMMP data, California Department of Water Resources land use data, County geographic information system (GIS) vegetation data, CNF grazing allotments data, US Department of Agriculture Statistics Service data, and Agricultural Weights and Measures Commodities data. This data is categorized into two main categories: grazing lands and croplands. The grazing lands category includes two types of land: grazing lands and field crops. The croplands category includes three agricultural land use types: intensive agriculture, orchards and vineyards, and truck crops. Table 2.2-5 describes the characteristics of each of the County-identified agricultural resources. Table 2.2-6 lists the County-identified agricultural resources and the corresponding acreages in the Alpine CPA, and Table 2.2-7 lists County-identified agricultural resources by subarea. Figures 2.2-2a and 2.2-2b depict the distribution of County-identified agricultural resources within the Alpine CPA subareas.

Table 2.2-5. County-Identified Agricultural Land Categories

Grazing Land Category	The County of San Diego Department of Planning & Development Services grazing land category includes grazing lands and field crops. Both field crops and grazing operations in San Diego County are economically marginal because of a lack of sufficient contiguous area with good soils, sufficient rainfall, and appropriate topography.
Grazing Lands	Grazing lands occupy the greatest acreage of all agricultural land in the County but represent a category of low value agricultural land use. These lands generally involve no mechanical impact on the land and require little support infrastructure. Grazing lands do not require the use of pesticides or irrigation infrastructure. Grazing is a low water use activity reliant on natural water sources or wells. The location of grazing lands in the County reflects this fact, with much of the identified grazing lands being located east of the San Diego County Water Authority service area.
Field Crops	Field crops include agriculture that requires clearing of native vegetation to plant a crop but requires little other farm management or inputs. Field crops do not require the use of pesticides or irrigation infrastructure. Most field crops in the County are dryland farmed, restricting active agricultural use of the land to the wet winter months. Field crops include alfalfa, oat, wheat, other grains and similar crops.
Cropland Category	The County of San Diego Department of Planning & Development Services cropland category includes intensive agriculture, orchards and vineyards, and truck crops. Commodities included in the cropland category generally involve more permanent or severe land disturbance.
Intensive Agriculture	This category includes semi-agricultural and incidental agricultural operations such as chicken farms, dairies, poultry farms, and livestock feed lots.
Orchards and Vineyards	Orchards and Vineyards include crops such as apples, apricots, avocados, citrus fruits and wine grapes.
Truck Crops	Truck crops include all indoor and outdoor greenhouse flowers, vegetable crops and row crops. Truck crops include tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, cauliflower and similar crops.

Source: County of San Diego 2011a

Table 2.2-6. County-Identified Agricultural Land in the Alpine CPA

County-Identified Agricultural Category	Acreage
Grazing Lands	
Grazing Lands	2,940.30
Field Crops	1,102.53
Croplands	
Intensive Agriculture	13.69
Orchards and Vineyards	17.31
Truck Crops	36.66

Source: County of San Diego 2019a

Table 2.2-7. County-Identified Agricultural Land by Subarea (acres)

	County-Identified Agricultural Category				
	Grazing Lands		Croplands		
Subarea	Grazing Lands	Field Crops	Intensive Agriculture	Orchards and Vineyards	Truck Crops
1	NP	NP	NP	NP	NP
2	35.91	5.62	NP	NP	NP
3	NP	3.54	NP	NP	NP
4	NP	49.73	NP	NP	NP
5	NP	29.71	NP	NP	NP
6	NP	1.97	NP	NP	NP
7	269.73	885.89	13.68	11.99	32.66

Source: County of San Diego 2020a
NP = Not Present

2.2.1.3 Agricultural Soils

In general, soil quality in San Diego County is poor due to its steep terrain and erodible soils. There are various measures of soil quality, including Land Capability Classification (LCC); Storie Index (SI); prime agricultural land as defined by the Williamson Act (Government Code Section 51201); Prime Farmland Soils and Soils of Statewide Importance as identified by FMMP; and County Prime Farmland Soil Candidate and County Statewide Important Soil Candidate. These soil quality measures are briefly described below and are discussed further in the Agricultural Guidelines and in the 2011 General Plan EIR Section 2.2.1.2, Agricultural Soils.

The LCC classifies soils according to their limitations when cultivated and the way they respond to management practices. Soils are designated as Class I through Class IV based on their characteristics. Class I soils have no significant limitation for raising crops, Class II soils have few limitations for cultivation, while Class III and IV soils have severe or very severe limitations for cultivation. In San Diego County, productive agriculture typically occurs on soils with LCC ratings of III and IV.

The SI numerically expresses soil quality on a 100-point scale. Higher SI ratings indicate higher quality soils. Productive agriculture in San Diego County typically occurs on soils with low SI ratings (typically in 30s).

Prime agricultural land is defined within Government Code Section 51201(c) as any soils having an LCC of I or II or an SI of 80 or higher. Only 6 percent of the San Diego region's soils meet the prime agricultural land soil quality criteria. Due to the steep terrain and erodible soils in the County, County soils are rated as poor.

The DOC publishes a list of soils that meet the criteria for Prime Farmland and Soils of Statewide Significance under the FMMP. The criteria for these categories are much broader than those of the Williamson Act prime agricultural soil criteria and are unique for each county in the state. In San Diego County, 44 soils qualify as Prime Farmland Soils and 65 qualify as Soils of Statewide Importance. Figures 2.2-3a and 2.2-3b depict the locations of FMMP Prime Farmland Soils and Soils of Statewide Importance in the Alpine CPA subareas, and Table 2.2-8 lists the acreages of FMMP agricultural soils by subarea.

Table 2.2-8. FMMP Prime and Statewide Significance Soils by Subarea

Subarea	Acreage of Important Agricultural Soil (FMMP)
1	NP
2	52.16
3	NP
4	158.53
5	71.89
6	13.83
7	838.21

Source: County of San Diego 2020a
NP = Not Present

As previously discussed in Section 2.2.1.2, *County-Identified Agricultural Resources*, the definition for an agricultural resource within the County has been broadened to capture the large number of small farms in San Diego County. This definition specifically includes County Prime Farmland Soil Candidates and Farmland of Statewide Importance Candidates that meet the definition of the DOC's FMMP. Figures 2.2-4a and 2.2-4b depict the County Candidate soil types underlain in the Alpine CPA subareas. A list of all County Candidate soils is provided in the Agricultural Guidelines, Attachment C. Table 2.2-8. In addition, Table 2.2-9 lists the acreages of County Candidate soils by subarea.

Table 2.2-9. County Candidate Soils by Subarea

Subarea	Acreages of Important County Candidate Soils
1	NP
2	50.27
3	NP
4	165.22
5	74.57
6	12.22
7	863.18

Sources: County San Diego 2020a
NP = Not Present

2.2.1.4 Types of Crops and Commodities

The unique topography and climate of San Diego County makes it an optimal location to produce a variety of crops that would be more difficult to grow elsewhere. The major crop categories cultivated in San Diego County are the following: nursery and flower crops (cut flowers, bedding plants, foliage), fruit and nut crops (avocados, citrus, berries), vegetable crops (tomatoes, mushrooms, herbs), livestock and poultry (cattle, pigs, chickens), livestock and poultry products (milk, eggs, hide), field crops (barley, hay, oat), timber, and apiary products (honey, bees wax, pollen) (County of San Diego 2011a).

The Alpine CPA has nine active growers at 25 different locations producing oats, wine grapes, and nursery plants. Table 2.2-10 provides the list of growers, types of commodities, and acreages of the active farms in the Alpine CPA.

2.2.1.5 Agricultural Zoning and Land Use Designations

The County of San Diego Zoning Ordinance divides the unincorporated areas of the County into zones based on existing land uses and to regulate future land uses. Most zones allow for agricultural uses, but there are two specific agricultural zones: Limited Agriculture (A70) and General Agriculture (A72). While both the A70 and A72 zones do not preclude other development such as a residence, the zones allow for greater flexibility for agricultural resources. The A70 zone is intended to regulate crop production and allows for a small number of animals to be kept. The A72 zone is intended for both crops and animals. Within the Alpine CPA, approximately 23,992.47 acres of land is zoned as A70 and 31,296.95 acres is zoned as A72. Figures 2.2-5a and 2.2-5b depict the agricultural zoning within the Alpine CPA subareas. Table 2.2-11 lists the acreages within the seven subareas that are zoned as A70 or A72.

Table 2.2-10. Active Agricultural Lands in Alpine CPA

Permittee (Grower)	Acreage	Crop
El Capitan High School FFA	63	Oat
El Capitan High School FFA	67	Oat
El Capitan High School FFA	100	Oat
El Capitan High School FFA	25	Oat
El Capitan High School FFA	10	--
El Capitan High School FFA	45	Oat
El Capitan High School FFA	69	Oat
El Capitan High School FFA	69	Oat
El Capitan High School FFA	52	Oat
El Capitan High School FFA	80	Oat
El Capitan High School FFA	27	Oat
El Capitan High School FFA	40	Oat
El Capitan High School FFA	50	Oat
Skye Valley Ranch	100	Oat
La Buena Vida Vineyards	0.5	Grape, Wine
Rock Canyon Vineyards	2.5	Grape, Wine
El Capitan High School FFA	8	Oat
Crestwinds Vineyard	20	Grape, Wine
Crestwinds Vineyard	8	Grape, Wine
Crestwinds Vineyard	20	Grape, Wine
Crestwinds Vineyard	10.5	Grape, Wine
Darby, Milo	--	Nursery
Flores, Josie	--	Nursery
Papa's Garden	--	Nursery
Tom C. Dyke Tree Farm and Nursery	--	Nursery

Source: County of San Diego 2019b
"--"= Not available

Table 2.2-11. Agricultural Zoning in the Alpine CPA by Subarea (acres)

Subarea	A70	A72
1	0.06	NP
2	78.77	NP
3	114.17	NP
4	408.06	244.06
5	1,470.32	484.87
6	1.44	NP
7	2505.78	9219.78
Total	4,578.6	9,219.78

Source: County of San Diego 2020b
NP = Not Present

The remaining portions of the subareas that are not zoned as Agricultural (A70 or A72) are zoned as Industrial, Residential (Urban, Single-Family, Variable, Mobilehome), Commercial and Office Space. Subarea 1 is currently zoned as Limited Impact Industrial and Urban Residential. Subarea 3 is partially zoned as Single Family Residential and partially as Agricultural. Subarea 6 is zoned as Commercial, which includes office space (General Commercial/Residential, General Commercial, and Heavy Commercial), Residential Mobilehome, and Variable Residential.

Land does not need to be zoned A70 or A72 to allow for agricultural use types. As previously stated, most zones allow for agricultural use types. Agriculture use types such as horticulture, tree crops, row and field crops, are permitted use types in all of the aforementioned zones. Agricultural packing and processing (specifically for limited, winery, and general uses) are also permitted in the Industrial M52 zone.

2.2.1.6 Williamson Act Contract Lands

The Williamson Act of 1965 was passed to preserve agricultural land and open spaces in California. The act provides the framework for local governments to enter into contract with private landowners to preserve farmland and ranchland. The County of San Diego has set forth policies for the implementation of the Williamson Act, which authorized the County to establish agricultural preserves. An Agricultural Preserve is adopted by the County of San Diego Board of Supervisors (BOS) and designates an area devoted to agriculture, open space, recreational use, or any combination of such uses, as defined by the Williamson Act, and by the County of San Diego BOS Policy I-38 Agricultural Preserves. An Agricultural Preserve must cover a minimum of 10 acres to be used for groves or croplands; for grazing land, the minimum is 80 acres; and for mixed land uses, the minimum is 40 acres. These preserves are established for the purpose of defining the boundaries of those areas within the County which would be willing to enter into contracts pursuant to the Act. Figures 2.2-6a and 2.2-6b depict the lands identified as Agricultural Preserves and lands under Williamson Act Contracts within the Alpine CPA and Table 2.2-12 lists the acreage of land by category within the Alpine CPA.

Only Subareas 5 and 7 contain lands designated as Agricultural Preserve and lands under Williamson Act Contract. There is 496.50 acres of Agricultural Preserve land and 456.02 acres of land under Williamson Act Contract in Subarea 5 as well as 2013.60 acres of Agricultural Preserve land and 935.19 acres of Williamson Act Contract land in Subarea 7. Table 2.2-12 provides the acreages of Agricultural Preserve and Williamson Act Contract land within the Alpine CPA; the remainder of the preserves and Williamson Act lands shown in Table 2.2-12 are outside of the seven subareas. Table 2.2-13 lists the acreages of Agricultural Preserve and Williamson Act Contract land by subarea.

Table 2.2-12. Agricultural Preserves and Williamson Act Contracts in the Alpine CPA

Category	Acreage
Agricultural Preserves	13,492.80
Alpine	534.53
Barrett Lake	3,747.32
Corte Madera	4,353.91
El Capitan	174.81
El Monte	NP
Japatul	4,606.11
Out	76.12
Williamson Act Contract	1,394.09

Source: County of San Diego 2019a
NP = Not Present

Table 2.2-13. Agricultural Preserves and Williamson Act Contracts in the Alpine CPA by Subarea (acres)

Subarea	Agricultural Preserves	Williamson Act Contract
1	NP	NP
2	NP	NP
3	NP	NP
4	NP	NP
5	496.50	456.02
6	NP	NP
7	2,013.60	935.19
Total	2,510.10	1,391.21

Source: County of San Diego 2020a
NP = Not Present

2.2.1.7 Summary of Existing Subarea Agricultural Resources

This section provides a summary of the agricultural resources identified in each of the subareas, as well as existing zoning and land use designations and their compatibility with agricultural uses. Table 2.2-14 provides a summary of the agricultural resources within each subarea.

Table 2.2-14. Agricultural Resources by Subarea

Sub-area	County-Identified Agricultural Land	Acres	FMMP	Acres	Important Agricultural Soils (FMMP and County Candidate Soils)	Acres	Williamson Act and Agricultural Preserve Land	Acres
1	NP		NP		NP		NP	
2	Grazing Lands/ Croplands	41.14	Grazing Land and Farmland of Local Importance	43.37	FMMP: Statewide Significance Soils and Prime Farmland County Candidate Soils: Statewide Significance and Prime Farmland	51.42 50.27	NP	
3	Croplands	3.54	NP		NP		NP	
4	Croplands	49.71	NP		FMMP: Statewide Significance Soils County Candidate Soils: Statewide Significance and Prime Farmland	158.52 165.22	NP	
5	Croplands	29.71	NP		FMMP: Prime Farmland Soils	71.89 74.57	Williamson Act Contract	456.02

Sub-area	County-Identified Agricultural Land	Acres	FMMP	Acres	Important Agricultural Soils (FMMP and County Candidate Soils)	Acres	Williamson Act and Agricultural Preserve Land	Acres
					County Candidate Soils: Prime Farmland		Agricultural Preserves	496.50
6	Croplands	1.97	Grazing Land	1.79	FMMP: Prime Farmland Soils County Candidate Soils: Statewide Significance and Prime Farmland	13.83 12.22	NP	
7	Grazing Lands/ Croplands	1,214.28	Grazing Land and Farmland of Local Importance	640.28	FMMP: Prime Farmland Soils County Candidate Soils: Statewide Significance and Prime Farmland	838.21 863.18	Williamson Act Contract Agricultural Preserves	935.19 2,014.60

Source: County of San Diego 2020a
NP = Not Present

Subarea 1

Subarea 1 encompasses a total of 57.71 acres of land and includes a very small portion of land zoned A70 (0.06 acre). Subarea 1 does not include A72 parcels (0.00 acres). The land use designations within Subarea 1 include Limited Impact Industrial land use and Village Residential (VR-) 7.3. The Village Residential category and the Limited Impact Industrial land uses are not consistent with agricultural use.

Subarea 1 does not contain state- or county-identified agricultural resources, including County Candidate Soils. There are no Agricultural Preserves or Williamson Act Contract land within this subarea.

Subarea 2

Subarea 2 includes several non-contiguous parcels totaling 142.66 acres. Approximately 78 acres of Subarea 2 is zoned as A70. The land use designations within Subarea 2 include VR-4.3, VR-2.9, and VR-2 and Semi-Rural Residential (SR-2). The Village Residential designations are generally not consistent with agricultural uses due to small lot acreages and potential for land use conflicts, while the Semi-Rural Residential land use designation is consistent with agricultural use.

This subarea contains approximately 5 acres of County-identified field crops, approximately 36 acres of County-identified grazing lands, approximately 22 acres of land categorized by the FMMP as Grazing Land, and 21 acres as Farmland of Local Importance, land identified as Important Agricultural Soils (51 acres), and County Candidate Soils of Prime and Statewide significance (50.27 acres). Refer to Figures 2.2-1a, 2.2-2a, 2.2-3a, 2.2-4a, 2.2-5a, and 2.2-6a. There are no Agricultural Preserves or Williamson Act Contract land within Subarea 2.

Subarea 3

All of Subarea 3, which totals approximately 114.17 acres, is zoned A70. The land use designation is SR-1, which is consistent with agricultural use.

Approximately 3.5 acres of Subarea 3 is identified by the County as an agricultural resource (field crops) as shown in Figure 2.2-2a. No FMMP-identified agricultural resources or County Candidate Soils are located in Subarea 3, and there are no Agricultural Preserves or Williamson Act Contract land within the subarea.

Subarea 4

Approximately 408 acres of Subarea 4 is zoned as A70, and the remaining 244 acres is zoned as A72. This subarea contains areas designated as SR-1 and SR-2, which are consistent with agricultural land use, and areas designated as VR-2, which would not be considered a consistent use type due to the required acreage.

This subarea contains approximately 50 acres of County-identified agricultural lands (field crops), as shown in Figure 2.2-2a. This subarea also includes approximately 158 acres categorized as containing Statewide Significance Soils (see Figure 2.2-3a) and approximately 165.22 acres of County Candidate Soils of Prime and Statewide significance (see Figure 2.2-4a). There are no Agricultural Preserves or Williamson Act Contract land within Subarea 4.

Subarea 5

Subarea 5 contains 2,080.52 acres, of which approximately 1,470 acres is zoned A70 and approximately 485 acres is zoned A72. Land use designations are Rural Lands (RL) 40, VR-2, SR-4, and Public Agency Land. Agricultural land uses are consistent with SR-4 and RL-40, and consistent under special circumstances with VR-2.

A small portion of this subarea, approximately 30 acres, consists of County-identified agricultural lands (field crops). Subarea 5 also contains approximately 72 acres identified as Prime Farmland Soils, lands identified as Agricultural Preserves (496 acres), lands under Williamson Act Contract (456 acres), and County Candidate Soils of Prime significance (74.57 acres). Refer to Figures 2.2-1a, 2.2-2a, 2.2-3a, 2.2-4a, 2.2-5a, and 2.2-6a.

Subarea 6

Subarea 6 is composed of 104.93 acres, of which 1.44 acres of land is zoned A70. The land use designations within Subarea 6 include VR-15 and General Commercial (C-1). Agricultural uses are not consistent with C-1 or VR-15 use designations.

Subarea 6 includes approximately 2 acres of County-identified agricultural resources (grazing land) as shown in Figure 2.2-2a. This subarea also contains approximately 14 acres identified as Prime Farmland Soils (see Figure 2.2-3a) and 12.22 acres of County Candidate Soils of Prime and Statewide significance (see Figure 2.2-4a). There are no agricultural preserves or Williamson Act Contract land within this subarea.

Subarea 7

Subarea 7 contains 15,211.42 acres, of which 2,505.78 acres of land is zoned A70 and 9,219.78 acres of land is zoned A72. The land use designations within Subarea 7 include SR-1, SR-2, SR-4, SR-10, RL-20,

RL-40, RL-80, Rural Commercial (RC), Public/Semi-Public Facilities (P/SP), Tribal Lands (TL), and Village Core Mixed Use (VCMU). Agricultural uses are consistent with Semi-Rural Residential and Rural Lands use designations but are not consistent with Rural Commercial, Public/Semi-Public Facilities, Tribal Lands, or Village Core Mixed Use due to higher densities.

Subarea 7 includes 1,214.28 acres of County-identified grazing lands and croplands, 571.66 acres of FMMP Farmland of Local Importance, 68.62 acres of FMMP Grazing Land, 838.21 acres of land identified as Important Agricultural Soils, and 863.18 acres of County Candidate Soils of Prime and Statewide Significance. Refer to Figures 2.2-1b, 2.2-2b, 2.2-3b, 2.2-4b, 2.2-5b, and 2.2-6b.

2.2.1.8 Forestry and Timberland Resources

The USFS defines a forested area as "forest land" if it is at least 1 acre in size and at least 10 percent occupied by forest trees of any size or formerly having had such tree cover and not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones, which are those "areas located between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, and forest areas adjacent to urban and built-up lands" (County of San Diego 2016).

The majority of federal forest land is managed as the National Forest System, which includes the following:

- National forest lands reserved from the US public domain
- National forest lands acquired through purchase, exchange, donation, or other means
- National grasslands
- Other lands, waters, or interests administered by the USFS or designated for administration through the USFS as part of the system.

The California Public Resources Code (PRC) (Section 12220(g)) defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and allows for management of one or more forestry resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

"Timberland" as defined by Section 4526 of the PRC, is land other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Sections 51112 or 51113 (h) of the PRC define a "Timberland Production Zone" as land used for growing and harvesting timber and compatible uses.

San Diego County does not contain lands zoned specifically for forest land, timberland, or timberland production. No land under County land use jurisdiction within the Alpine CPA contains any timberland resources as defined by Section 4526 of the PRC.

The CNF, under jurisdiction of the USFS, covers an extensive portion of the San Diego County, including lands in the northern, eastern, and southern portions of the Alpine CPA. The total acreage of CNF lands within the Alpine CPA is approximately 55,704.51 acres. Figures 2.2-7a and 2.2-7b depict the CNF within the Alpine CPA subareas. Subarea 3 contains 32.29 acres of CNF lands, Subarea 4 contains 0.02 acre of CNF lands, Subarea 5 contains 2,025.04 acres of CNF lands, Subarea 6 includes 4.34 acres of CNF lands, and Subarea 7 includes approximately 11,892.32 acres. There are no commercial timberland resources in CNF within the Alpine CPA.

The Alpine CPA contains a total of approximately 5,321.57 acres of Riparian Forest, Riparian Woodland, and "other woodlands" (see Section 2.4, *Biological Resources,* for a further discussion of the vegetation types present in the Alpine CPA). Other woodlands are generally characterized by black oak, coast live oak, and Engelmann oak woodlands, as well as mixed oak woodlands and undifferentiated open and dense woodlands. Figures 2.2-8a and 2.2-8b depict the forestry vegetation within the Alpine CPA subareas. Table 2.2-15 lists the forestry vegetation within the Alpine CPA and Table 2.2-16 lists the forestry vegetation within the subareas. Subarea 1 is the only subarea that does not contain any mapped forestry vegetation. The remainder of the subareas (2–7), all contain forestry vegetation totaling 2,214.32 acres, with the majority located within Subarea 7 (2,007.09 acres), the former FCI Lands. Therefore, the Alpine CPA could support forest land as defined by PRC Section 12220(g), although this category has not been officially designated in the CPA.

Table 2.2-15. Forestry Vegetation in the Alpine CPA

Forestry Vegetation	Acreage
Coniferous Forest	NP
Oak Forest	NP
Other Woodlands	3,153.34
Pinon-Juniper Woodland	NP
Riparian Forest	2,039.93
Riparian Woodland	128.30
Total	5,321.57

Source: County of San Diego 2020a
NP = Not Present

Table 2.2-16. Forestry Vegetation in the Alpine CPA by Subarea (acres)

Subarea	Other Woodlands	Riparian Forest	Riparian Woodlands	Total
1	NP	NP	NP	**NP**
2	NP	1.61	NP	**1.61**
3	14.73	3.97	NP	**18.70**
4	NP	7.86	NP	**7.86**
5	53.66	111.82	NP	**165.48**
6	1.37	12.21	NP	**13.58**
7	1,726.34	249.86	30.89	**2,007.09**
Total	**1,796.1**	**387.33**	**30.89**	**2,214.32**

Source: County of San Diego 2020a
NP = Not Present

2.2.2 Regulatory Framework

Section 2.13.2 of the 2011 General Plan EIR and Section 2.2.2 of the FCI EIR detail the federal, state and local regulatory framework related to agriculture resources. The regulatory framework in the prior EIRs that applies to the management and oversight of agriculture in the Alpine CPA has been incorporated into

this SEIR and provided below for reference. Because the adoption of the Agriculture Promotion Program by the County in March 2017 occurred after the prior EIRs were adopted, a summary of that regulation has also been provided below for reference. No changes to those regulations have been identified that would alter the conclusions from the prior EIRs. All regulations pertaining to agricultural resources used from the General Plan Update EIR were reviewed to ensure they are still valid and are incorporated by reference.

The 2011 General Plan EIR did not include an analysis of forestry resources. Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release date of the NOP for the 2011 General Plan EIR. Further discussion is included below in Section 2.2.3, *Analysis of Project Effects and Determination as to Significance*. In addition, the FCI EIR was prepared subsequent to the inclusion of the forestry resources significance criteria; thus, the FCI EIR does include an analysis of forestry resources. The federal, state, and local regulatory framework outlined in the FCI EIR represents the regulations that apply to the management and oversight of agricultural resources in the Alpine CPA. That regulatory framework has been incorporated into this SEIR.

Applicable federal regulations include:

- Farmland Protection Policy Act
- CNF Land Management Plan.

Applicable state regulations include:

- California Civil Code Section 3482.5 (Right to Farm Act)
- California Land Conservation Act (Williamson Act)
- California Farmland Conservancy Program
- Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000
- Open Space Subvention Act
- Farmland Mapping and Monitoring Program
- Farm and Ranch Lands Protection Program
- California Land Evaluation Site Assessment Model.

Applicable local regulations include:

- County of San Diego Code of Regulatory Ordinances Sections 63.401 through 63.407, Agricultural Enterprises and Consumer Information Ordinance
- County of San Diego BOS Policy I-38, Agricultural Preserves
- County of San Diego BOS Policy I-133, Support and Encouragement of Farming in San Diego County
- County of San Diego Farming Program
- Agricultural Clearing Permit Requirements
- Local Agricultural Resource Assessment Model.

Applicable local regulations not included in or adopted after adoption of the prior EIRs are described below.

2.2.2.1 Zoning Ordinance Sections 8900–8980, Adopted 7-31-14, Alpine Village Core Regulations

The Alpine Village Core regulations apply to the area identified in the Alpine CPA as the Village Core and are intended to preserve and promote the village character while creating a balanced automobile,

bicycling, and pedestrian-friendly environment for residents, business owners, and visitors. These regulations are also intended to encourage the continuation and growth of the character of Alpine while promoting the economic development of the Alpine Village Core. These regulations establish permitted uses, development standards, design standards, and thoroughfare design standards. As noted above, the Land Development Code is currently being updated, and the Alpine Village Core Regulations may be revised as part of that process.

2.2.2.2 Agriculture Promotion Program

The Agriculture Promotion Program (POD-14-001) was approved by the County of San Diego BOS in March 2017. The program included Zoning Ordinance amendments to clarify definitions associated with agricultural uses, supplement agricultural opportunities in the County by including new agri-tourism accessory uses, allow wineries in the S92 Use Regulations, and revise the animal use regulations. These amendments affect creameries, microbreweries, microdistilleries, and agricultural stores. The program improves the permitting process in order to promote agricultural production in the region.

2.2.2.3 Purchase of Agricultural Conservation Easement (PACE) Program

The PACE Program compensates agricultural property owners for placing a perpetual easement on their agricultural property that limits future land uses and extinguishes future development potential. To participate in the current program, a land owner must meet three eligibility requirements: (1) has actively farmed and/or ranched the property for a minimum of 2 years, prior to formally applying for participation in the PACE Program; (2) has realized a density reduction as a result of the 2011 General Plan; and (3) prior to the adoption of the 2011 General Plan, had the ability to subdivide the property. The PACE Program also includes a mitigation component, and associated mitigation credit fee, which allows PACE Program lands to be utilized as off-site mitigation for agricultural impacts resulting from private development projects. On February 14, 2018, the BOS directed expansion of the PACE Program under the CAP Measure T-1.2. The PACE Program guidelines will be updated to expand the agricultural lands eligible to participate in the program as part of CAP implementation and brought to the BOS for approval in late 2020.

2.2.2.4 Special Area Regulation Designator

All Williamson Act Contract lands are within Agricultural Preserves, which receive an "A" Special Area Regulation Designator pursuant to the Zoning Ordinance. These designators are intended to ensure that any land use permit processed by the County is consistent with the Williamson Act, including the County-adopted Agricultural Preserve and Contract. For those parcels under Contract, the "A" designator would generally be superseded by the requirements and restrictions of the established Contract. For non-contracted lands, the "A" designator further imposes findings on any proposal that requires a Major Use Permit to ensure that the use is not incompatible with the continued agricultural use of land within the Agricultural Preserve.

2.2.2.5 Conservation Subdivision Program

The Conservation Subdivision Program (CSP) was developed to encourage residential subdivision design that results in the preservation of local biodiversity, retention of existing agriculture/farmland, and many other benefits to sensitive environmental resources. This program is mandatory when subdividing property with General Plan residential land use designations of Semi-Rural 10 and Rural Lands 20, 40,

and 80. The CSP is being implemented through changes to the Zoning Ordinance, Subdivision Ordinance, and Resource Protection Ordinance (RPO).

2.2.2.6 County of San Diego General Plan Policies

The following are policies from the General Plan that are applicable to agriculture and forestry resources:

Conservation Element

Policy COS-6.2: Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:

- Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations
- Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses
- Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.
- Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture
- Supporting local and State right-to-farm regulations
- Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.

Policy COS-6.3: Compatibility with Recreation and Open Space. Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

Policy COS-6.4: Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands.

Land Use Element

Policy LU-6.1: Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

Policy LU-6.4: Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]

Policy LU-7.1: Agricultural Land Development. Protect agricultural lands with lower density land use designations that support continued agricultural operations.

Policy LU-7.2: Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.

2.2.2.7 Alpine CPU Policies

There are specific Alpine CPU goals and policies in the Land Use Element relevant to impacts and agricultural and forestry resources, which are summarized below.

Land Use Element

Goal LU-3 is proposed to preserve and enhance existing agricultural areas in Alpine. Policy LU-3.1 meets this goal by limiting heavy agriculture from encroaching on population concentrations with density greater than 1 du/4 acres.

2.2.3 Analysis of Project Effects and Determination as to Significance

2.2.3.1 Issue 1: Direct Conversion of Agricultural Resources

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance for Agricultural Resources (County of San Diego 2015) the proposed project would have a significant impact to an important on-site agricultural resource if the project:

- Has important agricultural resources as defined by the Local Agricultural Resource Assessment (LARA) Model.
- Would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP to non-agricultural uses.
- Would substantially impair the ongoing viability of the site for agricultural uses.

Impact Analysis

The prior EIRs determined that the re-designation of land used for agricultural uses to non-agricultural uses, and future subdivision and development of rural and semi-rural lands would result in the conversion of agricultural resources to non-agricultural uses. As such, it was determined that there would be significant direct and cumulative impacts related to conversion of agricultural resources. The discussion of impacts related to the direct conversion of agricultural resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.2.3.1 of the previous EIRs and is incorporated by reference.

Impacts of the 2011 General Plan and FCI GPA were determined to be significant and unavoidable with implementation of mitigation measures and General Plan policies. These mitigation measures and General Plan policies address sustainable, compatible development practices, support conservation easements and programs, and implement programs to conserve existing agricultural resources.

The Alpine CPU would allow for higher land use densities (i.e., residential, mixed use) within Subareas 2, 4, and 6 and expand the mobility network within Subarea 5 in comparison to the previous EIRs, which

could affect the viability for agricultural production within the locations of proposed higher density. The Alpine CPU does include policies to preserve and enhance existing agricultural areas in Alpine while separating use types of heavy commercial agriculture and higher density development to reduce potential land use conflicts. However, even with the incorporation of these policies, this impact remains potentially significant due to the presence of important agricultural resources where higher density would be allocated or where new mobility element roads are proposed. Generally, land designated for one dwelling unit (du) per gross acre is considered too small to support viable agricultural operation (County of San Diego 2011a). Alternatively, pursuant to the County Guidelines for Determining Significance for Agricultural Resources, a 2-acre lot with the right characteristics such as soil quality, would be considered viable for agricultural use in San Diego County due to the high cost of living: "the cost of land in the County makes it prohibitive for many new farmers to begin an operation on a large parcel, so the ability to farm small parcels is crucial to the success of future agriculture in San Diego County" (County of San Diego 2015).

Based on the above determinations, all Village Residential and Village Core Mixed Use parcels would not be suitable for agricultural use as these would allow for greater densities than 1 unit per acre. In contrast, the majority of Semi-Rural designations, with the exception of SR-0.5 would be suitable for agricultural use because these densities range from 1 unit per gross acre up to 1 unit per 10 gross acres. Therefore, conversions from lower densities such as Semi-Rural categories to a higher land use category could potentially convert agricultural resources to non-agricultural uses due to the minimum acreage required for viable agricultural land. Below is a discussion in further detail of the potential impacts within each subarea.

Subarea 1

The existing land use designation in Subarea 1 is VR-7.3 and Limited Impact Industrial (I-1) and does not contain any agricultural resources. The Alpine CPU also does not propose an increase in density or new allocation of commercial land uses within Subarea 1. The prior EIRs determined that impacts to the direct conversion of agricultural resources were potentially significant. However, the proposed project would not convert agricultural resources to non-agricultural resources in Subarea 1 and impacts would be **not significant.**

Subarea 2

The existing land use designations in Subarea 2 are Village Residential land use designations. The Alpine CPU would re-designate the land designated as VR-4.3, VR-2.9, and VR-2 to VR-10.9, VR-7.3, VR-2.9, SR-1, and Neighborhood Commercial (C-3). While some areas would allow for less density, the majority of the proposed land use changes would allow for an increase in density.

A total of approximately 41 acres of County-identified agricultural land (grazing lands and field crops) is present in the northern portion of this subarea. Subarea 2 also contains FMMP grazing land and Farmland of Local Importance, Statewide Significance Soils, and Prime Farmland Soils as well as County Candidate Soils of Prime and Statewide significance. The identified agricultural resources are mapped in the northern portion of the subarea as well as the southern portion of the subarea that is proposed to be re-designated from VR-2, VR-2.9, and VR-4.3 to VR-7.3 and VR-10.9.

The proposed project would increase density within Subarea 2, and the proposed re-designation to the Village Residential land use type is not a consistent land use designation with agricultural use types. The prior EIRs determined that impacts to the direct conversion of agricultural resources were potentially significant. The proposed project could further reduce the possibility of these lands to be used for

agricultural land. As such, the proposed increase in density within Subarea 2 would be **potentially significant** and mitigation would be required **(Impact-AG-1)**.

Subarea 3

The existing land use designation within Subarea 3 is SR-1, which is consistent with smaller agricultural uses. Subarea 3 includes approximately 3.5 acres of County-identified agricultural resources (field crops) but does not support County Candidate Soils, or Prime or Statewide significance soils mapped by FMMP. No new land use designations are proposed in Subarea 3. The prior EIRs determined that impacts to the direct conversion of agricultural resources were potentially significant. Impacts to the direct conversion of agricultural resources in Subarea 3 would remain the same and would be **potentially significant** and mitigation would be required **(Impact-AG-1).**

Subarea 4

The existing land use designations within Subarea 4 are SR-1, SR-2, and VR-2. The Alpine CPU would re-designate SR-1 and SR-2 to SR-0.5 and would re-designate VR-2 to VCMU and C-3. The proposed project would increase density where agricultural resources have been identified.

Approximately 50 acres of County-identified field croplands, 158 acres of Statewide Significance Soils, and 165 acres of County Candidate Soils of Prime and Statewide significance have been identified in Subarea 4. The identified agricultural resources are located in the northern, southern, and western portions of the subarea that would be re-designated from SR-1, SR-2, and VR-2 to SR-0.5 and VCMU. The Village Residential land use designations are not consistent land use designations with agricultural uses. The re-designation of the VR-2 to VCMU and C-3 would not result in an increase in impacts beyond what is identified in the prior EIRs. Land use designations SR-1 and SR-2 are consistent with smaller agricultural use types; however, the re-designation of SR-1 and SR-2 to SR-0.5 and VCMU, would both be inconsistent with agricultural uses and could further reduce the possibility of identified agricultural resources to be used for agricultural land. As such, impacts within Subarea 4 would be **potentially significant** and mitigation would be required **(Impact-AG-1)**.

Subarea 5

The existing land use designations in Subarea 5 are VR-2, Rural Commercial (C-4), SR-4, RL-40, and Public Agency Lands. The Alpine CPU would re-designate portions of SR-4 to General Commercial (C-1), SR-1, RL-20, RL-40, and a portion of C-4 to VR-2. In addition, a new mobility element road is proposed within Subarea 5. While some areas would allow for an increase in density, these locations do not contain any mapped or identified agricultural resources. All other areas would reduce the density in comparison to the 2011 General Plan and FCI GPA.

Subarea 5 has several agricultural resources identified within its boundaries. County-identified field crop lands, Prime Farmland Soils mapped by FMMP, and County Candidate Soils of Prime significance have been mapped in this subarea. The land use re-designations within Subarea 5 would result in a decrease in land use densities where agricultural resources have been identified. Impacts to agricultural resources resulting from density within Subarea 5 would be reduced compared to the prior EIRs. However, the proposed mobility element road would be located in an area where Prime Farmland Soils Mapped by FMMP and County Candidate Soils of Prime significance have been identified, which could result in the conversion of an agricultural resource to a non-agricultural resource. As such, impacts within Subarea 5 would be **potentially significant** and mitigation would be required **(Impact-AG-1**).

Subarea 6

The existing land use designations of Subarea 6 are VR-15, C-1, C-4, SR-1, and P/SP. The proposed project would re-designate all land use designations to VCMU within Subarea 6. The only aforementioned land use designation compatible with agricultural use types is SR-1.

Subarea 6 includes approximately 2 acres of land identified as FMMP grazing land, approximately 14 acres identified as Prime Farmland Soils, and approximately 12 acres of County Candidate Soils of Prime and Statewide significance. The prior EIRs determined that impacts to the direct conversion of agricultural resources were potentially significant. The proposed project would increase density within Subarea 6, which would further reduce the potential for the identified agricultural resources to be used as agricultural land; as such, impacts within Subarea 6 would be **potentially significant** and mitigation is required **(Impact-AG-1).**

Subarea 7

The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use designations within Subarea 7 are proposed. The prior EIRs determined that impacts to the direct conversion of agricultural resources were potentially significant. Impacts to direct conversion of agricultural resources in Subarea 7 would remain the same and would be **potentially significant,** and mitigation would be required **(Impact-AG-1).**

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, state, and local regulations identified in Section 2.2.2, *Regulatory Framework*, that are applicable to the Alpine CPU protect agricultural resources, including CEQA, RPO, and design guidelines. Through CEQA review of discretionary projects, the County is able to minimize impacts to agricultural and forestry resources. The County has prepared guidelines specifically for reviewing impacts to agricultural resources.

The Agricultural Promotion Program, PACE Program, and Agricultural Preserve Regulations provide opportunities and protections for agricultural resources and uses. The Agricultural Promotion Program supplements agricultural opportunities by including agri-tourism as an accessory use. The PACE Program provides for the preservation of agricultural resources through the placement of a perpetual easement over resources. The Agricultural Preserve Regulations of the County Zoning Ordinance regulate lands that are subject to agricultural zones or the S-80 use regulations and that have been designated as being within an agricultural preserve. Therefore, the existing regulations and processes aid in reducing impacts to agricultural resources but are not comprehensive to this issue.

Discretionary projects are reviewed for the direct conversion of agricultural resources based on the County's Agricultural Guidelines and CEQA. These guidelines require that evaluations include whether subsequent projects have important agricultural resources and whether the viability of agricultural resources would be substantially impaired. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to the direct conversion of agricultural resources.

Summary

The Alpine CPU includes policies and goals that would contribute to reducing potential land use conflicts and require preservation and enhancement of existing agricultural operations in Alpine. There are also regulations in place that would continue to apply to subsequent discretionary projects, including the

General Plan, the Agricultural Guidelines, agricultural designators, and conformance to the Williamson Act.

Impacts from the proposed project would be similar or greater than the prior EIRs because an increase in density in areas identified with important agricultural resources or existing agricultural use types would be allowed. As such, the proposed project could result in the direct conversion of agricultural resources. Therefore, impacts would be **potentially significant** and mitigation would be required (**Impact-AG-1**).

2.2.3.2 Issue 2: Conflict with Agricultural Zoning or a Williamson Act Contract

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance for Agricultural Resources (County of San Diego 2015), the proposed project would have a significant impact if it would conflict with Zoning for Agricultural Use or a Williamson Act Contract or the provisions of the California Land Conservation Act of 1965 (Williamson Act).

Impact Analysis

The prior EIRs determined that direct conflicts with agricultural zones or Williamson Act Contracts could occur, resulting in potentially significant direct and cumulative impacts. The discussions of impacts related to conflict with agricultural zones and Williamson Act Contracts from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.2.3.2 of the prior EIRs and are incorporated by reference.

The prior EIRs determined impacts to be less than significant with implementation of mitigation measures and General Plan policies, which would require sustainable, compatible development practices, support conservation easements and programs, and implement programs to conserve existing agricultural resources. In addition, the prior EIRs mitigation measures would require an analysis of potential adverse impacts on Williamson Act Contract lands before the removal of the "A" (agriculture) designator in the Zoning Ordinance for any property. The prior EIRs determined that the projects would not contribute to a potentially significant cumulative impact.

The Alpine CPU would allow for higher land use densities (i.e., commercial use, mixed-use) within Subareas 2, 4, and 6, and mobility network changes in Subarea 5, in comparison to the prior EIRs, which could conflict with existing zoning for agricultural uses or Williamson Act Contracts. The Alpine CPU does include policies to preserve and enhance existing agricultural areas in Alpine while separating use types of heavy commercial agriculture and higher density development to reduce potential land use conflicts. However, even with the incorporation of these policies, this impact remains potentially significant due to the inclusion of zoning for agricultural land and Williamson Act Contracts within Subareas 2, 3, 4, 5, 6, and 7 where density would either remain the same or higher density development and mobility element changes would be allocated under the proposed project. Below is a discussion in further detail of the potential impacts within each subarea.

Subarea 1

Subarea 1 is not zoned A72 and does not have any existing mapped Williamson Act Contract land or Agricultural Preserve land. A total of 0.06 acre of Subarea 1 is zoned A70; however, 0.06 acre would not be considered viable agricultural land. The proposed project does not include an increase in density or new allocation of commercial land uses within Subarea 1. The prior EIRs concluded that impacts to a

conflict with agricultural zoning or Williamson Act Contracts were potentially significant; however, the proposed project would not conflict with zoning for agricultural land or Williamson Act Contracts in Subarea 1; as such, impacts would be **not significant.**

Subarea 2

The western and southern portions of Subarea 2 are zoned A70. No portions within Subarea 2 are zoned A72, and no Williamson Act Contract land or Agricultural Preserve land is mapped within Subarea 2. The proposed project would re-designate VR-4.3, VR-2.9, and VR-2 to VR-10.9, VR-7.3, VR-2.9, SR-1, and C-3. While some areas would allow for less density, the majority of the proposed land use changes would allow for an increase in density.

The Village Residential land use type is not a consistent land use designation with agricultural use types. The proposed project would increase density and could result in the conversion of an agricultural resource to a non-agricultural use. The prior EIRs concluded that impacts to a conflict with agricultural zoning or Williamson Act Contracts were potentially significant. As such, impacts within Subarea 2 would be **potentially significant** and mitigation would be required **(Impact-AG-2)**.

Subarea 3

Subarea 3 is entirely zoned A70 and does not have any existing mapped Williamson Act Contract land or Agricultural Preserve land. No changes to the land use types within Subarea 3 are included in the proposed project. The prior EIRs concluded that impacts to a conflict with agricultural zoning or Williamson Act Contracts were potentially significant. Impacts from the proposed project in Subarea 3 would be similar and would be **potentially significant (Impact-AG-2).**

Subarea 4

All of Subarea 4 is zoned for agricultural use types. The western and southern portions of Subarea 4 are zoned A70, and the northeastern portion of Subarea 4 is zoned A72. No areas within Subarea 4 include mapped Williamson Act Contract land or Agricultural Preserve land. The existing land use designations within Subarea 4 are SR-1, SR-2, and VR-2. The proposed project would re-designate SR-1 and SR-2 to SR-0.5 and would re-designate VR-2 to VCMU and C-3. The entirety of this subarea would allow for an increase in density.

The Village Residential land use type is not a consistent land use designation for agricultural use. Therefore, the re-allocation of the VR-2 to VCMU and C-3 would further increase the possibility of land use conflicts with agricultural resources. The SR-1 and SR-2 land use designations are both consistent with smaller agricultural uses. However, the re-designation of SR-1 and SR-2 to SR-0.5 and VCMU would both be inconsistent with agricultural uses and could result in incompatible densities for land zoned for agriculture. The prior EIRs concluded that impacts to a conflict with agricultural zoning or Williamson Act Contracts were potentially significant. Impacts from the proposed project would be greater and would be **potentially significant** and mitigation would be required **(Impact-AG-2).**

Subarea 5

The southeastern portion of Subarea 5 is zoned A72, and the remaining portion of Subarea 5 is zoned A70. Subarea 5 also contains existing land mapped as Williamson Act Contract land and Agricultural Preserve Land.

The existing land use designations in Subarea 5 are VR-2, C-4, SR-4, RL-40, and Public Agency Lands. The proposed project would re-designate portions of SR-4 to C-1, SR-1, RL-20, RL-40, and a portion of C-4 to VR-2. While the majority of areas would reduce density, a few locations would increase the density in either land zoned for agriculture, Williamson Act Contract land, and/or Agricultural Preserve land. In addition, a new mobility element road is proposed within Subarea 5.

Within the northern portion of Subarea 5, a portion of land (approximately 12 acres) under Williamson Act Contract (456 acres) and County Agricultural Preserve Land (496 acres) would be re-designated from RL-40 to SR-4. Within the County a parcel size of over 1 acre may be considered viable agricultural land. However, the Williamson Act requires at least 10 acres to enter into a contract, if not more, dependent upon factors such as climate and soil quality. Although the land under a Williamson Act Contract may not be in active agricultural production, re-designating the land use designation from RL-40 to SR-4 would introduce incompatible residential land uses and represent a conflict with Williamson Act Contract Lands in Subarea 5.

Approximately 2 acres of land within the eastern portion of Subarea 5 are zoned for agricultural use and would be re-designated from SR-4 to C-1. This location does not contain any County Agricultural Resources, FMMP Prime or Statewide-significant soils, County Candidate Soils, or active agricultural operations.

A new mobility element road is proposed in Subarea 5; this location does not include any Williamson Act Contracts or Agricultural Preserves. However, the introduction of a new mobility element road would introduce a conflict with agricultural zoning.

The prior EIRs concluded that impacts to a conflict with agricultural zoning or Williamson Act Contracts were potentially significant. Although the overall density would be reduced within Subarea 5, the proposed project would allow for an increase in density and a new mobility element road in areas where agricultural resources are present. As such, the proposed project could result in incompatible densities for land zoned for agriculture. Thus, impacts within Subarea 5 would be **potentially significant** and mitigation would be required **(Impact-AG-2)**.

Subarea 6

Subarea 6 contains 1.44 acres zoned as A70 and does not have any existing mapped Williamson Act Contract land or Agricultural Preserve land. The A72 zone is not present within this subarea. The proposed project would increase density within Subarea 6. Although the prior EIRs determined impacts to conflicts with agricultural zoning or a Williamson Act Contract as potentially significant, because the 1.44 acres zoned as A70 has already been developed and is no longer viable for agricultural use, impacts from the proposed project within Subarea 6 would be **not significant.**

Subarea 7

Subarea 7 contains 2,505.28 acres zoned as A70, 9,219.78 acres zoned as A72, 2,013.60 acres of Agricultural Preserve Land, and 935.19 acres of Williamson Act Contract Land. No land use re-designations are proposed within Subarea 7. Although no new land use designations are proposed, the prior EIRs determined impacts to conflicts with agricultural zoning or a Williamson Act Contract as potentially significant. Therefore, impacts to conflicts with agricultural zoning or a Williamson Act Contract in Subarea 7 would remain the same and would be **potentially significant,** and mitigation would be required **(Impact-AG-2).**

Federal, State, and Local Regulations and Existing Regulatory Processes

The existing regulations and processes that are relevant to conflicting with Agricultural Zoning or Williamson Act Contracts are similar as those identified for conversion of agricultural resources in Section 2.2.3.1 above. Through CEQA review of discretionary projects, the County is able to minimize impacts to agricultural resources. The County has prepared guidelines specifically for reviewing impacts to agricultural resources, including land use conflicts with agricultural zoning and Williamson Act Contracts.

The Agricultural Preserve Regulations provide protections for agricultural resources and uses. The Agricultural Preserve Regulations of the County Zoning Ordinance regulate lands that are subject to agricultural zones or the S-80 use regulations and that have been designated as being within an agricultural preserve. Therefore, the existing regulations and processes aid in reducing impacts to agricultural resources but are not comprehensive to this issue.

Discretionary projects are reviewed for land use conflicts with agricultural resources based on the County's Agricultural Guidelines and CEQA. These guidelines require that evaluations extend to areas adjacent to Williamson Act Contract lands, to lands under Contract, and existing agricultural operations. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to land use conflicts with agricultural resources.

Summary

The Alpine CPU includes policies and goals that would contribute to reducing potential land use conflicts and require preservation and enhancement of existing agricultural operations in Alpine. There are also regulations in place that would continue to apply to subsequent projects that are discretionary, including the General Plan, the Agricultural Guidelines, agricultural designators, and conformance to the Williamson Act.

The proposed project would increase density and introduce a new mobility element road in areas identified with land zoned for agricultural land or mapped as Williamson Act Contract or County Agricultural Preserve Lands in Subarea 4 and Subarea 5, which may result in land use conflicts. Land use designation changes that introduce incompatible uses to Agriculture Preserves and lands under Williamson Act Contracts would not necessarily remove this land from the Agricultural Preserves or from protection under the Williamson Act; however, it would allow incompatible development in or adjacent to these lands, which would threaten the viability and full protection of the resources. Therefore, impacts would be **potentially significant** and mitigation would be required (**Impact-AG-2)**.

2.2.3.3 Issue 3: Indirect Conversion of Agricultural Resources

Guidelines for the Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance for Agricultural Resources (County of San Diego 2015), the proposed project would have a significant impact if the project:

- Proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract, and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- Proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
- Would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.

Impact Analysis

The prior EIRs determined that future development associated with implementation of the 2011 General Plan and FCI GPA could result in the indirect conversion of agricultural resources. General Plan policies COS-6.2, COS-6.4, and prior EIRs mitigation measures were determined to reduce impacts by encouraging compatible development adjacent to agricultural operations and by implementing programs for the conservation of agricultural land. However, even with the implementation of General Plan policies and mitigation measures, the prior EIRs concluded that the indirect conversion of agricultural land as significant and unavoidable. The discussion of impacts related to the indirect conversion of agricultural land from implementation of the 2011 General Plan and the FCI GPA can be found in Section 2.2.3.3 of the 2011 General Plan EIR and Section 2.2.3.4 of the FCI EIR and is incorporated by reference.

The Alpine CPU would allow for higher land use densities (i.e., commercial use, mixed-use) within Subareas 2, 4, 5, and 6, and mobility network changes, in comparison to the prior EIRs, which could result in the indirect conversion of agricultural resources. The Alpine CPU does include policies to preserve and enhance existing agricultural areas in Alpine while separating use types of heavy commercial agriculture and higher density development to reduce potential land use conflicts. However, even with the incorporation of these policies, this impact remains potentially significant due to the presence of Williamson Act Contracts or existing agricultural operations within or adjacent to Subareas 2, 4, 5, and 6 where higher density development and mobility changes would be allocated per the proposed project. No new land use designations are proposed for Subareas 1, 3, and 7. Further details of the proposed re-designation of land uses and mobility element changes and the potential indirect impact to agriculture resources, are discussed below.

Subarea 1

Subarea 1 is not zoned A72 and does not have any existing mapped Williamson Act Contract land or Agricultural Preserve land or within a 1-mile radius from Subarea 1. A total of 0.06 acre of Subarea 1 is zoned A70. County-identified agricultural resources, including field crops, grazing lands, orchards and vineyards, and truck crops, are mapped within a 1-mile radius of Subarea 1. The proposed project does not propose an increase in density or new allocation of commercial land uses within Subarea 1. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. Therefore, indirect impacts to agricultural resources in Subarea 1 would remain the same and would be **potentially significant,** and mitigation would be required **(Impact-AG-3).**

Subarea 2

The proposed project would re-designate the land currently designated as VR-4.3, VR-2.9, and VR-2 to VR-10.9, VR-7.3, VR-2.9, SR-1, and Neighborhood Commercial (C-3) within Subarea 2. While some

portions of this subarea would allow for less density, the majority of the proposed land use changes would allow for an increase in density.

Subarea 2 includes County-identified agricultural resources (grazing lands and field crops), as well as FMMP Grazing lands and Agricultural Resources of Local Importance. In addition, County-identified agricultural resources, including field crops, grazing lands, and orchards and vineyards, as well as FMMP Agricultural Resources, are mapped within a 1-mile radius of Subarea 2. No Williamson Act Contracts or Agricultural Preserves exist within Subarea 2, or within a 1-mile radius of Subarea 2. The nearest Williamson Act Contract or Agricultural Preserve is located 3.5 miles to the east and would therefore not be impacted.

The prior EIRs determined indirect impacts to agricultural resources as potentially significant. The proposed project would increase density, which would be incompatible with agricultural resources. In addition, the Village Residential land use type is not a consistent land use designation with agricultural uses. As such, the proposed project could result in a greater indirect conversion of an agricultural resource to a non-agricultural resource. Impacts from the proposed project would be **potentially significant** and mitigation would be required **(Impact-AG-3)**.

Subarea 3

Subarea 3 is entirely zoned A70 and does not have any existing mapped Williamson Act Contract land or Agricultural Preserve land. County-identified agricultural resources, including field crops, grazing land, and orchards and vineyards, as well as Williamson Act Contracts and Agricultural Preserves, are located within a 1-mile radius of Subarea 3. No changes to the land use types within Subarea 3 are proposed by the Alpine CPU. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. Therefore, indirect impacts to agricultural resources in Subarea 3 would remain the same and would be **potentially significant** and mitigation is required **(Impact-AG-3).**

Subarea 4

The proposed project would re-designate SR-1 and SR-2 to SR-0.5 and would re-designate VR-2 to VCMU and C-3 within Subarea 4. The entirety of this subarea would allow for an increase in density. Subarea 4 includes County-identified agricultural resources (field crops) but does not contain any FMMP Agricultural Resource land, Williamson Act Contracts or Agricultural Preserves. County-identified agricultural resources, including field crops, grazing land and truck crops, FMMP Agricultural Resources, and a Williamson Act Contract, are mapped within a 1-mile radius of Subarea 4. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. Therefore, because the proposed project would allow for an increase in density that would be incompatible with agricultural resources, indirect impacts to agricultural resources within Subarea 4 would be **potentially significant** and mitigation is required **(Impact-AG-3).**

Subarea 5

The proposed project would re-designate portions of SR-4 to C-1, SR-1, RL-20, and RL-40 and re-designate C-4 to VR-2 within Subarea 5. While the majority of this subarea would reduce the density, a few locations would increase density. In addition, a new mobility element road is proposed within Subarea 5.

Subarea 5 includes County-identified agricultural resources (field crops), Williamson Act Contracts, and Agricultural Preserves, but does not contain any FMMP Agricultural Resource Land. County-identified agricultural resources, including field crops, grazing land, orchards and vineyards, and truck crops, as well as FMMP Agricultural Resources, Williamson Act Contract, and Agricultural Preserves, are mapped within

a 1-mile radius of Subarea 5. Direct impacts to Williamson Act Contracts in Subarea 5 were determined to be potentially significant requiring mitigation. The land proposed to be re-designated to SR-4 is also adjacent to other Williamson Act Contract and Agricultural Preserve lands and could introduce incompatible residential land uses. Although the land under Williamson Act Contracts may not be in active agricultural production, re-designating the land use from RL-40 to SR-4 near the Williamson Act Contracts and/or Agricultural Preserves represents a conflict with Williamson Act Contract lands. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. The proposed project would allow for future development that would be incompatible with agricultural resources and indirect impacts to agricultural resources within Subarea 5 would be **potentially significant**; **therefore,** mitigation is required **(Impact-AG-3).**

Subarea 6

The proposed project would re-designate VR-15, C-1, C-4, SR-1, and P/SP to VCMU within Subarea 6. The only aforementioned land use designation compatible with agricultural use types is SR-1.

Subarea 6 includes County-identified agricultural resources (field crops) and FMMP Agricultural Resource Land (Grazing). No Williamson Act Contracts or Agricultural Preserves are located within Subarea 6 or within a 1-mile radius of Subarea 6. However, County-identified agricultural resources, including field crops, grazing lands, and orchards and vineyards, as well as FMMP Agricultural Resources, are located within a 1-mile radius of Subarea 6. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. The proposed project would increase density within Subarea 6. As such, impacts within Subarea 6 would be **potentially significant** and mitigation would be required **(Impact-AG-3).**

Subarea 7

The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use designations within Subarea 7 are proposed by the proposed project. The prior EIRs determined indirect impacts to agricultural resources as potentially significant. Impacts to the indirect conversion of agricultural resources in Subarea 7 would remain the same and would be **potentially significant,** and mitigation would be required **(Impact-AG-3).**

Federal, State, and Local Regulations and Existing Regulatory Processes

The existing regulations and processes relevant to the indirect conversion of agricultural resources are similar as those identified in Sections 2.2.3.1 and 2.2.3.2 above. Through CEQA review of discretionary projects, the County is able to minimize impacts to agricultural resources. The County has prepared guidelines specifically for reviewing impacts to agricultural resources, including the indirect conversion of agricultural resources.

The Agricultural Promotion Program, the PACE Program, and the Agricultural Preserve Regulations provide opportunities and protections for agricultural resources and uses. The Agricultural Promotion Program supplements agricultural opportunities by including agri-tourism as an accessory use. The PACE Program provides for the preservation of agricultural resources through the placement of a perpetual easement over resources. The Agricultural Preserve Regulations of the County Zoning Ordinance regulates lands that are subject to agricultural zones or the S-80 use regulations and that have been designated as being within an agricultural preserve. Therefore, the existing regulations and processes aid in reducing impacts to agricultural resources but are not comprehensive to this issue.

Discretionary projects are reviewed for the indirect conversion of agricultural resources based on the County's Agricultural Guidelines and CEQA. These guidelines require the consideration of development

compatibility with surrounding agricultural operations. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to the indirect conversion of agricultural resources.

Summary

The Alpine CPU includes policies and goals that would contribute to reducing potential land use conflicts and require preservation and enhancement of existing agricultural operations in Alpine. There are also regulations in place that would continue to apply to subsequent projects that are discretionary, including the General Plan, the Agricultural Guidelines, agricultural designators, and conformance to the Williamson Act.

The proposed project would increase density in areas identified with land mapped or adjacent to land mapped as Williamson Act Contract, County Agricultural Preserve Lands, County-identified Agriculture Resource, or FMMP Agricultural Resource, and would introduce incompatible use types. Land use designation changes that introduce incompatible uses to Agriculture Preserves and lands under Williamson Act Contracts would not necessarily remove this land from the Agricultural Preserves or from protection under the Williamson Act; however, it would allow incompatible development in or adjacent to these lands, which would threaten the viability and full protection of the resources. Likewise, the proposed project would also increase density within a 1-mile radius of existing agricultural operations, which may result in land use conflicts. Because the prior EIRs determined significant and unavoidable indirect impacts to the indirect conversion of agricultural resources and the higher density development proposed as part of the proposed project would allow incompatible land uses to occur within or adjacent to agriculture resources, impacts would be **potentially significant** and mitigation is required (**Impact-AG-3).**

2.2.3.4 Issue 4: Direct and Indirect Loss or Conversion of Forestry Resources

Guidelines for the Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment that, due to their location or nature, could result in conversion of forest land to non-forest use.

Impact Analysis

The 2011 General Plan EIR did not include an analysis of forestry resources. Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the approval of the 2011 General Plan EIR.

Forestry resources were analyzed in the FCI EIR. The FCI EIR determined that future development within the FCI lands may result in land uses that are incompatible with adjacent or nearby CNF lands. These land uses on adjacent or nearby lands could lead to permanent impacts on these forest lands due to factors such as erosion/siltation, invasive plants, edge effects, noise, night-lighting, and habitat fragmentation, or indirect conversion of forest lands to non-forest use. The FCI EIR concluded that the FCI GPA would result in a significant direct and cumulative impact. The discussion of impacts related to forestry resources can be found in Section 2.2.3.4 of the FCI EIR and is hereby incorporated by reference.

Although the San Diego County does not contain lands zoned specifically for forest land, timberland, or timberland production, San Diego County does contain land that may meet the definition of Forest Land as defined by 12220(g) of the PRC. The proposed project would increase densities and land use intensities (i.e., commercial use, mixed-use) within Subareas 2, 4, 5, and 6, and mobility network changes, in comparison to the FCI EIR, which has the potential to affect forest land in San Diego County. The Alpine CPA also includes areas within CNF, which is part of the National Forest System. The CNF covers large portions of the northern and southern Alpine CPA. It is important to note that not all areas within the CNF meet the definition of forestry resources as defined by PRC. In addition, some areas within the Alpine CPA may contain forestry resources that are not within the CNF boundary, as noted under Section 2.2.1.8, *Forestry and Timberland Resources*. The Alpine CPA does not contain any "timberland" as defined by PRC Section 4526. Further details of the proposed re-designation of land uses within the Alpine CPA and their potential impacts to forestry resources are discussed below.

Subarea 1

Subarea 1 does not contain any mapped forestry vegetation and no land use re-designations are proposed. Therefore, the proposed project would not result in the direct or indirect loss or conversion of forestry resources within Subarea 1 and impacts would be **not significant.**

Subarea 2

Subarea 2 is not within the CNF but does have 1.61 acres of mapped forestry vegetation, as listed in Table 2.2-16, and therefore has the potential to support forestry resources. In addition, mapped forest vegetation exists within a 1-mile radius of Subarea 2. The Alpine CPU would re-designate VR-4.3, VR-2.9, and VR-2 to VR-10.9, VR-7.3, VR-2.9, SR-1, and C-3. As previously stated, impacts to forestry resources were not analyzed under the 2011 General Plan EIR. In addition, no previous FCI lands exist within Subarea 2 and impacts to forestry resources within Subarea 2 would not have been analyzed under the FCI EIR. The FCI EIR determined impacts to the direct and indirect loss or conversion of forestry resources as potentially significant. Consistent with the conclusions of the FCI EIR, the direct and indirect loss or conversion of these forestry resources within Subarea 2 would be **potentially significant** and mitigation is required **(Impact-AG-4)**.

Subarea 3

A portion of Subarea 3 is within the CNF that is former FCI lands and has 18.7 acres of mapped forestry vegetation, and it may contain forestry resources. No land use re-designations are proposed within Subarea 3. Although no new land use designations are proposed, the FCI EIR determined impacts to the direct and indirect loss or conversion of forestry resources as potentially significant. Impacts to forestry resources in Subarea 3 would remain the same and would be **potentially significant** and mitigation is required **(Impact-AG-4).**

Subarea 4

Subarea 4 is not within the CNF but does have 7.86 acres of mapped forestry vegetation as listed in Table 2.2-16 and therefore has the potential to support forestry resources. In addition, mapped forest vegetation and the CNF is located within a 1-mile radius of Subarea 4. The proposed project would re-designate SR-1 and SR-2 to SR-0.5 and would re-designate VR-2 to VCMU and C-3. All proposed designations within this subarea would allow for an increase in density. As previously stated, impacts to forestry resources were not analyzed under the 2011 General Plan EIR. In addition, no previous FCI lands are located within Subarea 4 and impacts to forestry resources within Subarea 4 would not have been

analyzed under the FCI EIR. The FCI EIR determined impacts to the direct and indirect loss or conversion of forestry resources as potentially significant. Consistent with the conclusions of the FCI EIR, the direct and indirect loss or conversion of these forestry resources, within Subarea 4, would be **potentially significant** and mitigation would be required **(Impact-AG-4).**

Subarea 5

The majority of Subarea 5 (approximately 281 acres) is located within the CNF (approximately 226 acres), which also includes former FCI lands. Subarea 5 has 165.48 acres of mapped forestry vegetation and has the potential to support forestry resources. In addition, mapped forest vegetation and the CNF are present within a 1-mile radius of Subarea 5. The proposed project would re-designate portions of SR-4 to C-1, SR-1, RL-20, and RL-40 and re-designate C-4 to VR-2. In addition, a new mobility element road is proposed within Subarea 5. While the majority of areas would reduce density, a few locations that have the potential to support forestry resources and are located within the CNF would increase the density. This would include the re-designation of SR-4 to SR-1 and C-1 and the re-designation of RL-40 to SR-4. Because the FCI EIR determined impacts to direct and indirect loss or conversion of forestry resources as potentially significant, and the proposed project would allow for future development that would be incompatible with forest resources, direct and indirect impacts within Subarea 5 would be **potentially significant** and mitigation is required **(Impact-AG-4).**

Subarea 6

Approximately 4 acres of CNF land and former FCI lands is located within Subarea 6. Subarea 6 also has 13.58 acres of mapped forestry vegetation and has the potential to support forestry resources. In addition, mapped forest vegetation and the CNF are present within a 1-mile radius of Subarea 6. The proposed project would re-designate VR-15, C-1, C-4, SR-1, and P/SP to VCMU. Impacts to forestry resources were not analyzed under the 2011 General Plan EIR and no previous FCI lands exist within Subarea 6. Impacts to forestry resources within Subarea 6 were not analyzed under the FCI EIR. The FCI EIR determined impacts to direct and indirect loss or conversion of forestry resources as potentially significant. Consistent with the conclusions of the FCI EIR, the direct and indirect loss or conversion of these forestry resources within Subarea 6 would be **potentially significant** and mitigation is required **(Impact-AG-4).**

Subarea 7

Subarea 7 is located within the CNF, is the former FCI lands, has 2,214.32 acres of mapped forestry vegetation, and has the potential to support forestry resources. The proposed project does not propose any re-designation of land use types within this subarea. Although no new land use designations are proposed, the FCI EIR determined impacts to the direct and indirect loss or conversion of forestry resources as potentially significant. Therefore, impacts to forestry resources in Subarea 7 would remain the same and would be **potentially significant,** and mitigation is required **(Impact-AG-4).**

Federal, State, and Local Regulations and Existing Regulatory Processes

According to the FCI EIR, San Diego County includes approximately 402,434 acres of CNF lands, which are under jurisdiction of the USFS. Management of these forest lands is facilitated through the CNF Land Management Plan. As identified in the Management Plan, the production of wood products, including fuel wood harvesting, is suitable activity within all designated land use zones.

Discretionary projects are reviewed for the direct and indirect conversion of forestry resources based on CEQA. CEQA requires the consideration of the viability of forestry resources and development compatibility with surrounding forestry resources. Therefore, when subsequent discretionary projects

are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to the direct and indirect conversion of forestry resources. Through CEQA review of discretionary projects, the County is able to minimize impacts to forestry resources.

Summary

The Alpine CPU includes policies and goals that would help serve to reduce loss of forest land and conversion of forest land to a non-forest use. Conservation and Open Space Goal COS-1 promotes the well-planned management of all valuable resources, natural and man-made, and prevents the destruction and wasteful exploitation of natural resources, where feasible. Implementation of the proposed goal would help reduce impacts on natural resources, which would include forestry and timberland resources. There are also regulations in place that would apply to subsequent discretionary projects, including CEQA and the General Plan.

The proposed project would increase density in areas identified with land mapped or adjacent to land mapped as forestry resources. The proposed project would also increase density within a 1-mile radius of existing forestry resources, which may result in land use conflicts. The 2011 General Plan EIR did not analyze impacts to forestry resources; however, the FCI EIR did analyze impacts to forestry resources and determined impacts to be significant and unavoidable. The proposed density increase could have land use conflicts related to forestry resources. As such, impacts would be **potentially significant** and mitigation is required (**Impact-AG-4).**

2.2.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for agriculture and forestry resources includes the communities surrounding the Alpine CPA that have a similar climate and conditions for agricultural crops and have similar issues related to decreasing resource availability. These include the adjacent CPAs of Lakeside, Crest-Dehesa, Central Mountain (including the Descanso and Pine Valley Subregions), Jamul-Dulzura, and Mountain Empire, as well as any tribal lands within the Alpine CPA and these communities.

2.2.4.1 Issue 1: Direct Conversion of Agricultural Resources

A cumulative impact would occur to agricultural resources if development associated with cumulative projected growth within the Alpine CPA or directly surrounding community combined with the Alpine CPU would result in the conversion of an agricultural resource or would substantially impair the ongoing viability of the site for agricultural use. Future growth within and adjacent to the Alpine CPA would result in more dense development and mobility network changes than currently exist and would have the potential to directly convert agricultural resources. Therefore, as identified in the prior EIRs, the cumulative projects in communities adjacent to the Alpine CPA would have the potential to result in a significant cumulative impact.

Cumulative projects located in the geographic scope would have the potential to result in a cumulative impact to agricultural resources if in combination with the proposed project would result in the conversion of an important agricultural resource or would substantially impair the ongoing viability of the site for agricultural use. Incompatible land uses such as commercial, industrial, or high density residential would directly convert agricultural resources to non-agricultural uses. Therefore, cumulative projects in the communities adjacent to Alpine could result in potential direct impacts on agricultural resources that are cumulatively considerable.

As described above in Section 2.2.3.1, *Issue 1: Conversion of Agricultural Resources*, the land use designations within the proposed project would have the potential to result in the direct conversion of agricultural resources to a non-agricultural use. In combination with other cumulative projects, the proposed project would have the potential to result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-AG-1**).

2.2.4.2 Issue 2: Conflict with Agricultural Zoning or a Williamson Act Contract

A cumulative impact would occur to agricultural zoning or a Williamson Act Contract if development associated with cumulative projected growth within the Alpine CPA or directly surrounding community combined with the proposed project would conflict with Zoning for Agricultural Use or a Williamson Act Contract. Future growth within and adjacent to the Alpine CPA would result in more dense development and mobility network changes than currently exist and would have the potential to conflict with Zoning for Agricultural use or a Williamson Act Contract. Therefore, as identified in the prior EIRs, the cumulative projects in communities adjacent to the Alpine CPA would have the potential to result in a significant cumulative impact.

Cumulative projects located in the geographic scope would have the potential to result in a cumulative impact to agricultural resources if in combination with the proposed project would result in conflicts with Zoning for Agricultural use or a Williamson Act Contract. Proposed development, including high density residential, commercial, industrial, or mixed-use development, would introduce land uses that may conflict with agricultural zoning. Development of higher density and intense land uses within Agriculture Preserves would prevent these lands from being able to secure a Williamson Act Contract in the future. Therefore, cumulative projects in the communities adjacent to Alpine could result in potential impacts to existing Zoning for an agricultural use or a Williamson Act Contract that are cumulatively considerable.

As described above in Section 2.2.3.2, *Issue 2: Conflict with Zoning or a Williamson Act Contract*, the land use designations within the proposed project would have the potential to result in a conflict with Zoning for an agricultural use or a Williamson Act Contract. In combination with other cumulative projects, the proposed project would result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-AG-2**).

2.2.4.3 Issue 3: Indirect Conversion of Agricultural Resources

An indirect impact would occur to an active agricultural operation or Williamson Act Contract if development associated with cumulative projected growth within the Alpine CPA or directly surrounding community combined with the Alpine CPU would result in the indirect conversion or loss of those resources. Future growth within and adjacent to the Alpine CPA would result in more dense development and mobility network changes than currently exist and would have the potential to result in the conversion or loss of active agricultural operations or Williamson Act Contract land. Therefore, as identified in the prior EIRs, the cumulative projects in communities adjacent to the Alpine CPA would have the potential to result in a significant cumulative impact.

Cumulative projects located in the geographic scope would have the potential to result in a cumulative indirect impact to agriculture if in combination with the proposed project would result in the indirect conversion or loss of those resources. Development adjacent to agricultural resources could result in indirect impacts due to physical development, as well as from an increase in population density near a resource. The indirect impacts could result in decreased viability or value in agricultural land and could

result in the conversion of this land. Therefore, cumulative impacts from future growth and development would be significant.

As described in Section 2.2.3.3, *Issue 3: Indirect Conversion of Agricultural Resources*, the land use designations within the proposed project would have the potential to result in indirect impacts to agricultural resources. In combination with other cumulative projects, the proposed project would have the potential to result in **a potentially significant indirect cumulative impact** and mitigation would be required for agricultural resources (**Impact-C-AG-3).**

2.2.4.4 Issue 4: Direct and Indirect Loss or Conversion of Forestry or Timberland Resources

A cumulative impact would occur to forest land if development associated with cumulative projected growth within the Alpine CPA or directly surrounding community combined with the Alpine CPU would result in the loss of forest land or conversion of forest land to non-forest use. Future growth within and adjacent to the Alpine CPA would result in more dense development and mobility network changes than currently exist and would have the potential to result in the loss or conversion of forest land. Therefore, as identified in the FCI EIR, the cumulative projects in communities adjacent to the Alpine CPA would have the potential to result in a significant cumulative impact.

Cumulative projects located in the geographic scope would have the potential to result in a cumulative impact to forest land if in combination with the proposed project would result in the conversion or loss of forest land to a non-forest use. Future growth and development in the communities adjacent to the Alpine CPA would have the potential to encroach on previously undeveloped forest land.

As previously identified, the County does not contain any jurisdictional land as forest lands. Therefore, impacts related to the rezoning of forest land would be less than significant.

Although San Diego County does not contain lands zoned specifically for forest land, timberland, or timberland production, the San Diego County does contain land that may meet the definition of Forest Land as defined by 12220(g) of the PRC. As described in Section 2.2.3.4, Issue 4: *Direct and Indirect Loss or Conversion of Forestry Resources*, the proposed project could result in the loss of forest land or conversion of forest to a non-forest use. Land use changes to Subareas 2, 4, 5, and 6 (which include or are within the boundary of CNF and/or contains former FCI lands) would introduce more dense land uses that may directly or indirectly impact forestry resources. In combination with other cumulative projects, the proposed project would have the potential to result in **a potentially significant direct or indirect cumulative impact** and mitigation would be required (**Impact-C-AG-4**).

2.2.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potentially significant direct and cumulative impacts to the conversion of agricultural and forestry resources; conflict with agricultural zoning, active agricultural operations, or Williamson Act Contracts; and the indirect conversion of agricultural or forestry resources.

Impact-AG-1: Cause the Direct Conversion of Agricultural Resources. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the direct conversion of agricultural resources compared to the prior EIRs. This would be considered a significant impact.

Impact-AG-2: Conflict with Agricultural Zoning or Williamson Act Contract. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe

potentially significant impacts related to conflict with agricultural zoning or Williamson Act contract compared to the prior EIRs. This would be considered a significant impact.

Impact-AG-3: Cause the Indirect Conversion of Agricultural Resources. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the indirect conversion of agricultural resources compared to the prior EIRs. This would be considered a significant impact.

Impact-AG-4: Cause the Direct or Indirect Conversion of Forestry Resources. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to the direct and indirect conversion of agricultural resources compared to the FCI EIR. This would be considered a significant impact.

Impact-C-AG-1: Result in a Cumulatively Considerable Contribution to the Direct Conversion of Agricultural Resources. The proposed project would cause a more severe potentially significant impact related to the direct conversion of agricultural resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AG-2: Result in a Cumulatively Considerable Contribution to the Conflict with Agricultural Zoning or Williamson Act Contract. The proposed project would cause a more severe potentially significant impact related to the conflict with agricultural zoning or Williamson Act contract compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AG-3: Result in a Cumulatively Considerable Contribution to the Indirect Conversion of and Agricultural Resource. The proposed project would cause a more severe potentially significant impact related to the indirect conversion of agricultural resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AG-4: Result in a Cumulatively Considerable Contribution to the Direct or Indirect Conversion of Forestry Resources. The proposed project would cause a more severe potentially significant impact related to the direct and indirect conversion of forestry resources compared to the FCI EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.2.6 Mitigation

2.2.6.1 Issue 1: Direct Conversion of Agricultural Resources

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. With implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies, **Impact-AG-1** and **Impact-C-AG-1**, and Alpine CPU mitigation measure, impacts would be reduced but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts associated with agricultural resources to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.

- Restrict any development of land uses with allowable densities of 1 du/acre or more, due to potential incompatibilities with agricultural resources.

  Explanation: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed project. Restricting land use densities of 1 du/acre or more would result in a greater concentration of lower density land uses distributed throughout the Alpine CPA and would discourage sustainable growth because infrastructure costs, vehicle miles traveled, and environmental impacts associated with development would be increased.

- Create a land use designation solely for agricultural resources, within which no other land uses would be allowable.

  Explanation: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed project and/or in areas where existing land uses are not the same as those considered by the proposed project. Additionally, many agricultural operations throughout the Alpine CPA are unique in that they operate on small lots, located adjacent to a variety of land uses, such as residential. Creating an agriculture- resource-only land use designation would negatively impact many existing County agricultural operations located in non-agricultural land uses.

2011 General Plan EIR and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Agr-1.1 through Agr-1.5 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures, as well as project specific mitigation, would reduce the proposed project's impacts on direct conversion of agricultural resources but not to a level below significance.

Alpine CPU Mitigation Measures

MM-AG-1: As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, applicants shall be required to demonstrate that the project would not convert agricultural resources that meet the Prime and Statewide soil criteria, as defined by the FMMP, and as determined by the Agricultural Guidelines, to a non-agricultural use or appropriate project-specific mitigation shall be required. Applicants may be subject to subsequent project-level analysis pursuant to the County LARA model and/or submit an agricultural resources report to determine the importance, and mitigation (if required) of said agricultural resources. This shall occur on a project-by-project basis and would be required through conformance with the Guidelines for Determining Significance for Agricultural Resources.

2.2.6.2 Issue 2: Conflict with Agricultural Zoning or a Williamson Act Contract

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project specific mitigation measures to reduce impacts. With implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies, Impact-AG-2 and Impact-C-AG-2 would be reduced to less than significant.

2011 General Plan EIR and FCI EIR Mitigation Measures

The following prior EIRs mitigation measure is being carried forward and shall apply to the proposed project: Agr-2.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this mitigation measure would reduce the proposed project's impacts on conflicts with agricultural zoning or a Williamson Act Contract to a less than significant level.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.2.6.3 Issue 3: Indirect Conversion of Agricultural Resources

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. With implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies, **Impact-AG-3** and **Impact-C-AG-3** would be reduced but not to a level below significant. Therefore, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measure was considered in attempting to reduce impacts associated with agricultural resources to below a level of significance. However, the County has determined that this measure would be infeasible and therefore this mitigation measure would not be implemented.

- Within 0.5 mile of any agricultural resource, approve development that is compatible in size and scope with the existing agricultural resource.

  Explanation: This measure would be infeasible because it would restrict future development in areas identified for increased growth by the proposed project. Small farming operations are typical in the County, and many existing and potential agricultural operations are located on small parcels with intermixed surrounding land uses. This measure would restrict certain types of incompatible development in these areas, which would have the potential to conflict with the land uses considered by the proposed project.

2011 General Plan and FCI Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: AGR-1.1 through AGR-1.5 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures, as well as project-specific mitigation measures, would reduce the proposed project's indirect impacts on agricultural resources, but not to a level below significance.

Alpine CPU Mitigation Measures

MM-AG-2: As a part of the discretionary review of subsequent projects located within a one-mile radius of an existing agricultural operation, Williamson Act Contract or County Agricultural Preserve, shall be required to demonstrate that the project would not indirectly impact said resources or appropriate project-specific mitigation shall be required. Subsequent projects may be assessed pursuant to the County LARA model and/or prepare an agricultural resources report to determine impacts and mitigation (if required) to reduce indirect impacts

to said resource. This shall occur on a project-by-project basis and would be required through conformance with the Guidelines for Determining Significance for Agricultural Resources.

2.2.6.4 Issue 4: Direct and Indirect Loss or Conversion of Forestry Resources

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. With implementation of the following FCI EIR mitigation measures, in combination with the General Plan policies, **Impact-AG-4** and **Impact-C-AG-4** would be reduced but not to a level below significant. Therefore, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measure was considered in attempting to reduce impacts associated with forestry resources to below a level of significance. However, the County has determined that this measure would be infeasible and therefore this mitigation measure would not be implemented.

- Require that all development proposed within the project area evaluate and mitigate the direct loss or conversion of forestry resources.

  Explanation: This measure was determined not to be feasible because most future development in the project areas will be permitted with ministerial permits that will not be subject to environmental review.

2016 FCI Mitigation Measures

The following FCI EIR mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1, Bio-1.3, and Bio-1.6 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures, as well as project-specific mitigation measures, would reduce the proposed project's indirect impacts on agricultural resources, but not to a level below significance.

Alpine CPU Mitigation Measures

MM AG-3: As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, applicants shall be required to demonstrate that the project would not convert forestry resources as determined by CEQA, to a non-forestry use or appropriate project-specific mitigation shall be required. Applicants may be subject to subsequent project-level analysis that may require an agricultural resources report to determine the resource importance, impacts and mitigation (if required). This shall occur on a project-by-project basis and would be required pursuant to CEQA.

2.2.7 Conclusion

2.2.7.1 Issue 1: Direct Conversion of Agricultural Resources

Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes to the direct conversion of agricultural resources as compared to the impacts identified in the prior EIRs, which would be considered a potentially significant impact (**Impact-AG-1**). The proposed project in conjunction with subsequent projects would result in a

potentially significant cumulative impact **(Impact-C-AG-1).** However, for the reasons described above, the application of existing regulations, in combination with the General Plan and Alpine CPU policies and mitigation measures described in Section 2.2.6.1, would reduce direct and cumulative impacts to the direct conversion of agricultural resources but not to a level below significant. Impacts would remain **significant and unavoidable** and **would be cumulatively considerable**.

2.2.7.2 Issue 2: Conflict with Agricultural Zoning or a Williamson Act Contract

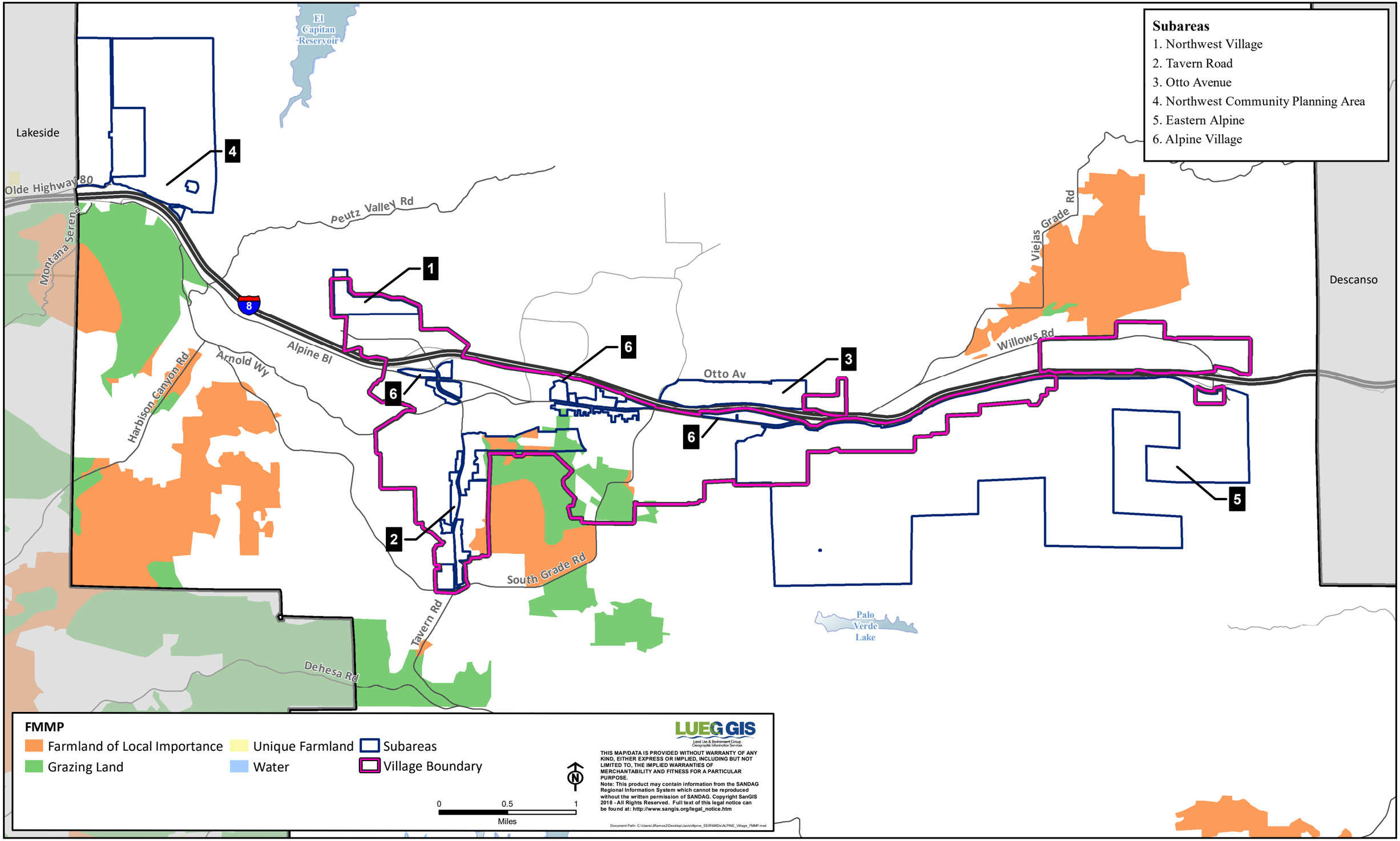
Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes related to the conflict with agricultural zoning and Williamson Act Contract as compared to the impacts identified in the prior EIRs, which would be considered a potentially significant impact (**Impact-AG-2**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-AG-2**). However, for the reasons described above, the application of existing regulations, in combination with the General Plan and Alpine CPU policies and mitigation measures described in Section 2.2.6.2, would reduce direct and cumulative impacts to the conflict with agricultural zoning and Williamson Act Contract to a **less than significant** level and cumulative impacts **would not be cumulatively considerable.**

2.2.7.3 Issue 3: Indirect Conversion of Agricultural Resources

Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes to the indirect conversion of agricultural resources as compared to the impacts identified in the prior EIRs, which would be considered a potentially significant impact (**Impact-AG-3**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-AG-3**). However, for the reasons described above, the application of existing regulations, in combination with the General Plan and Alpine CPU policies and mitigation measures described in Section 2.2.6.3, would reduce direct and cumulative impacts to the direct conversion of agricultural resources but not to a level below significant. Impacts would remain **significant and unavoidable** and **would be cumulatively considerable**.

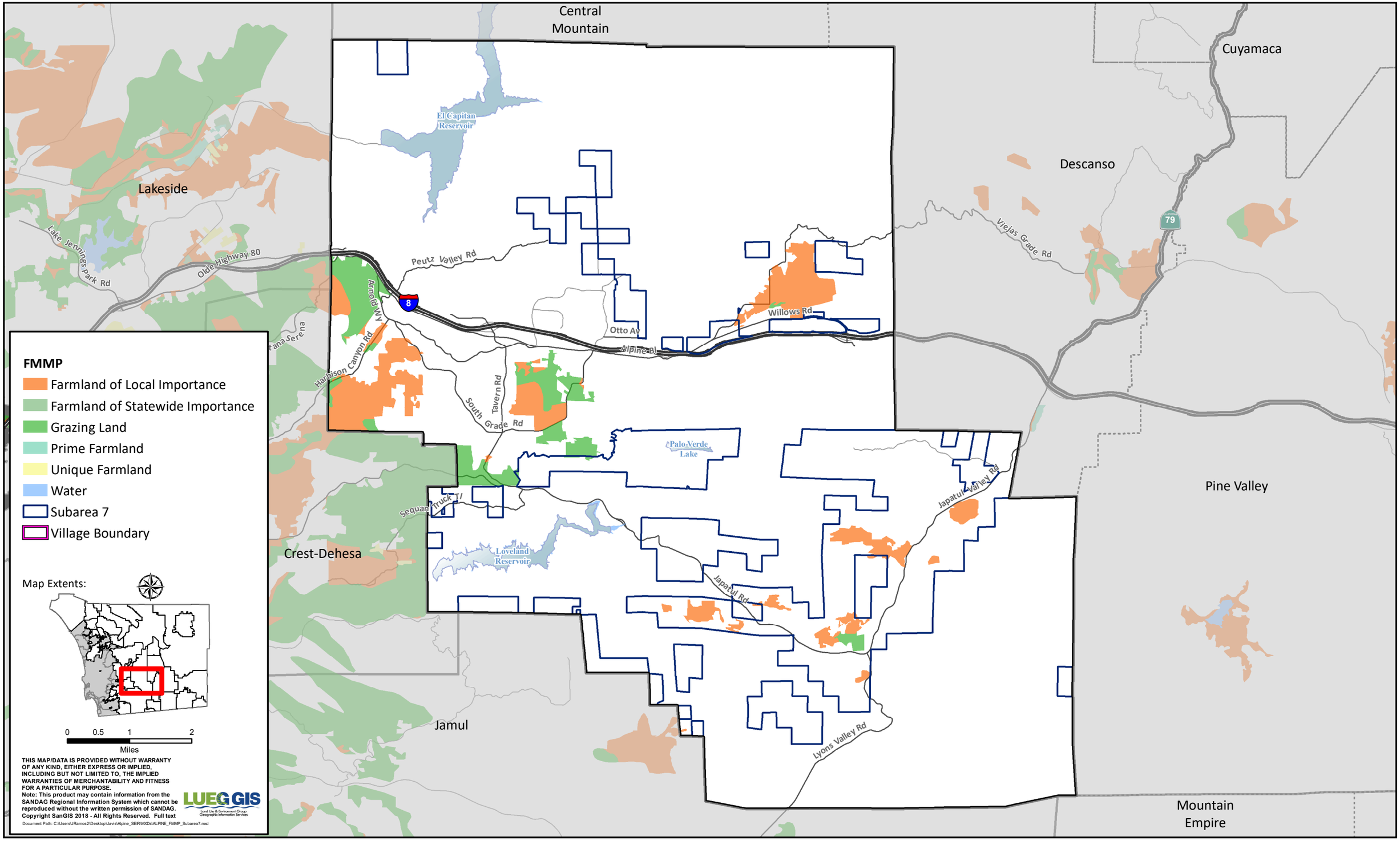
2.2.7.4 Issue 4: Direct and Indirect Loss or Conversion of Forestry Resources

Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes to the direct and indirect conversion of forestry resources as compared to the impacts identified in the FCI EIR, which would be considered a potentially significant impact (**Impact-AG-4**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-AG-4**). However, for the reasons described above, the application of existing regulations, in combination with the General Plan and Alpine CPU policies and mitigation measures described in Section 2.2.6.4, would reduce direct and cumulative impacts to the direct conversion of agricultural resources but not to a level below significant. Impacts would remain **significant and unavoidable** and **would be cumulatively considerable**.



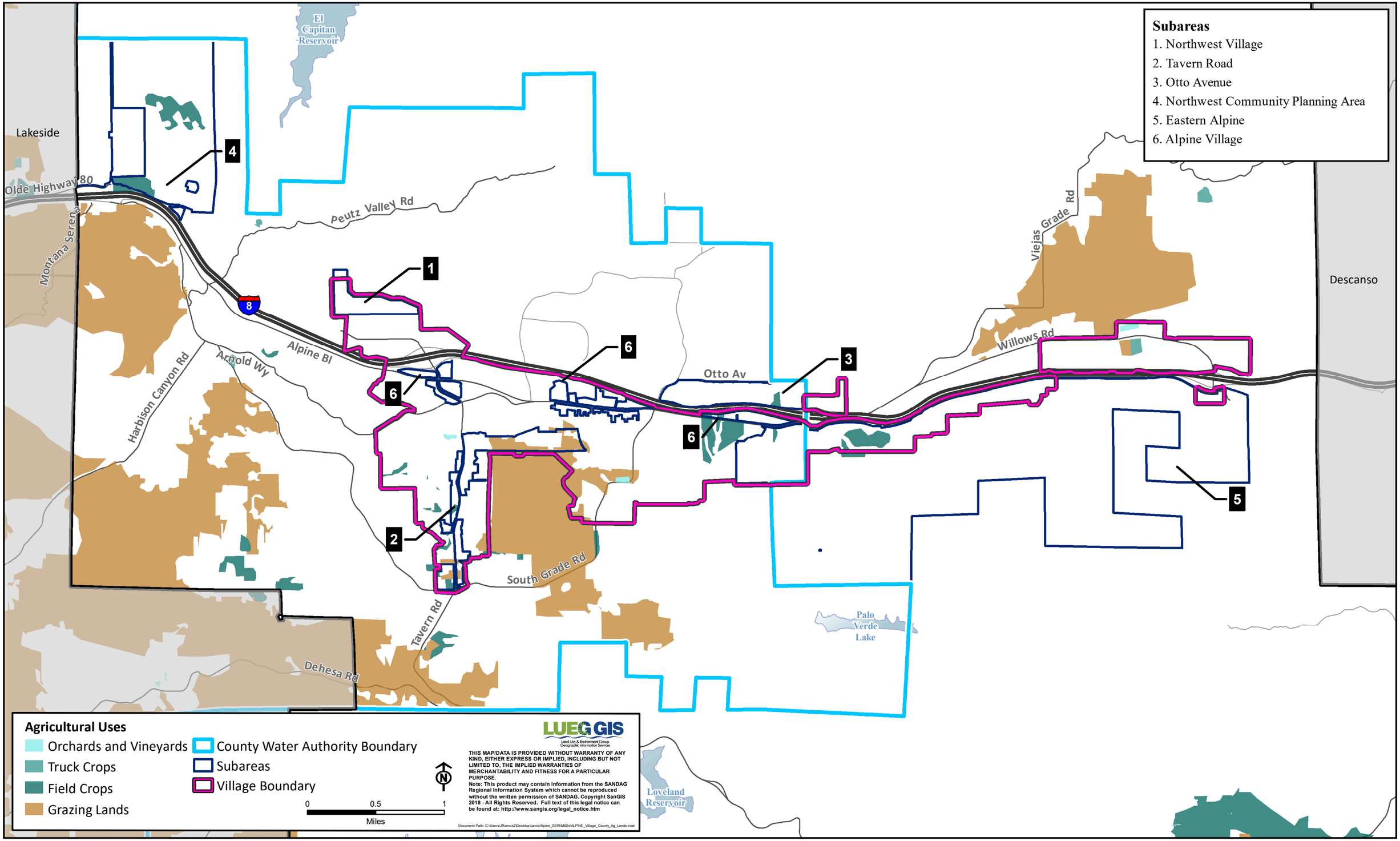
Source: SanGIS, County of San Diego, 2020

Figure 2.2-1a
FMMP Categories
Subareas 1-6



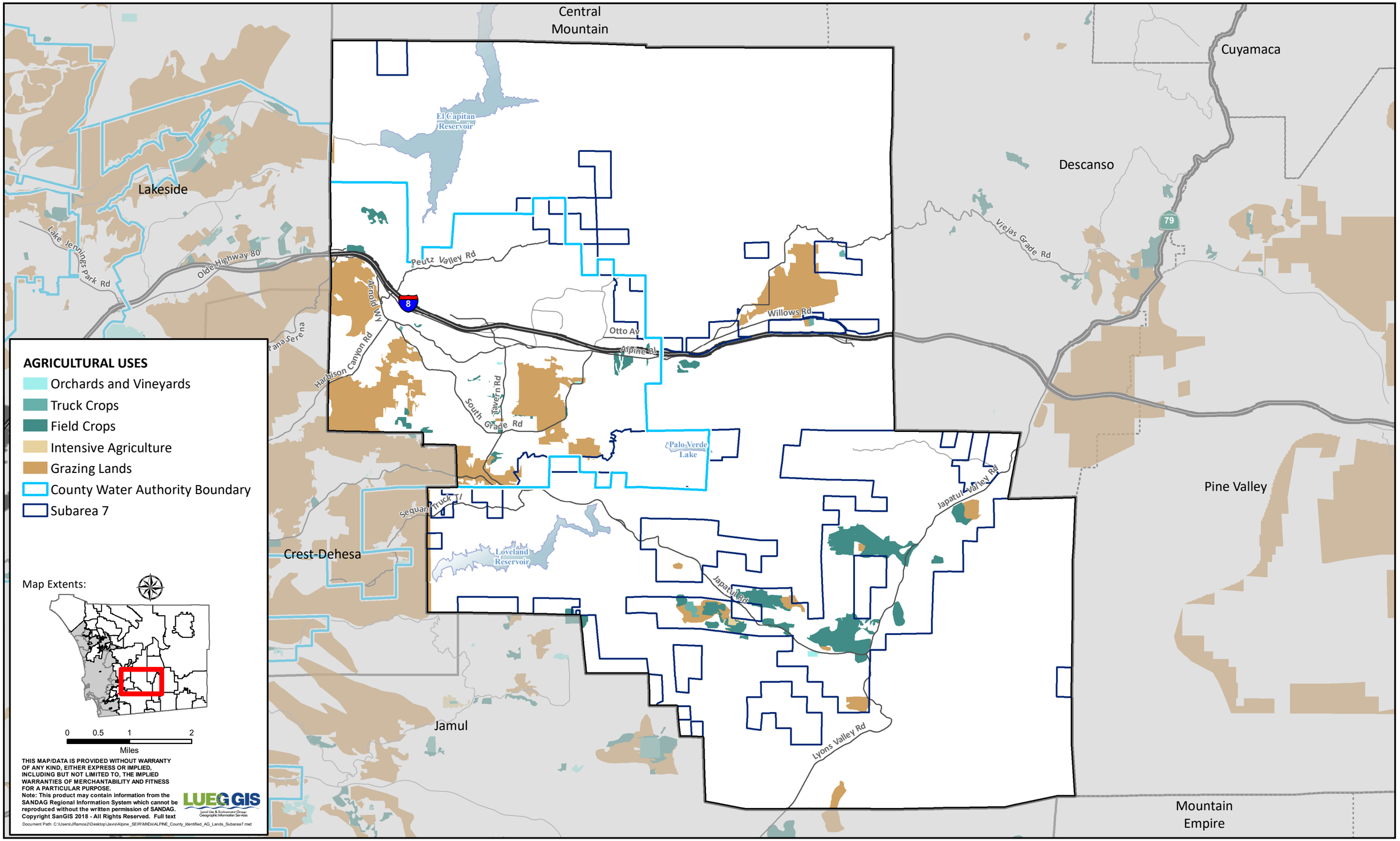
Source: SanGIS, County of San Diego, 2020

Figure 2.2-1b
FMMP Categories
Subarea 7



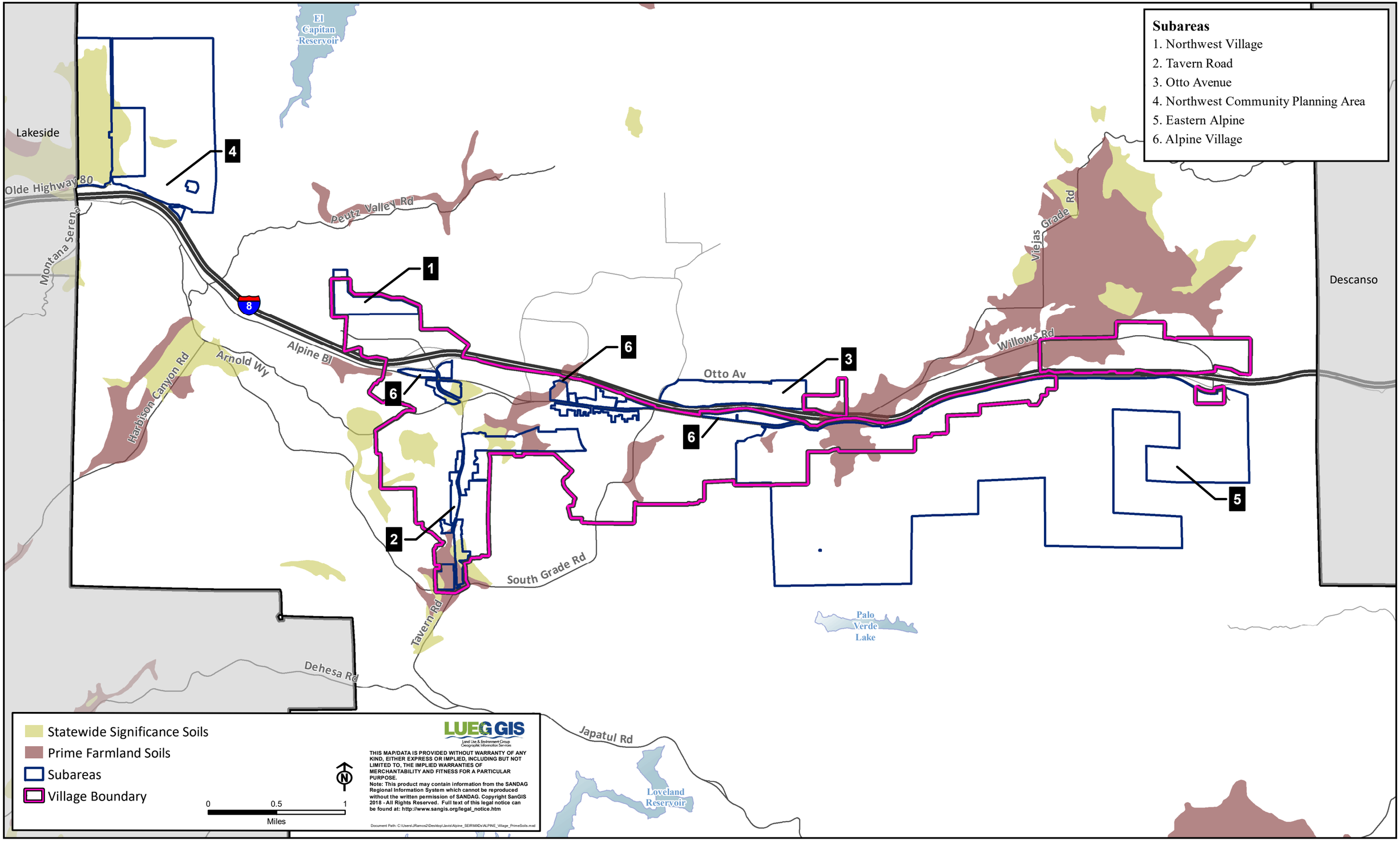
Source: SanGIS, County of San Diego, 2020

Figure 2.2-2a
County Identified Agricultural Lands
Subareas 1-6



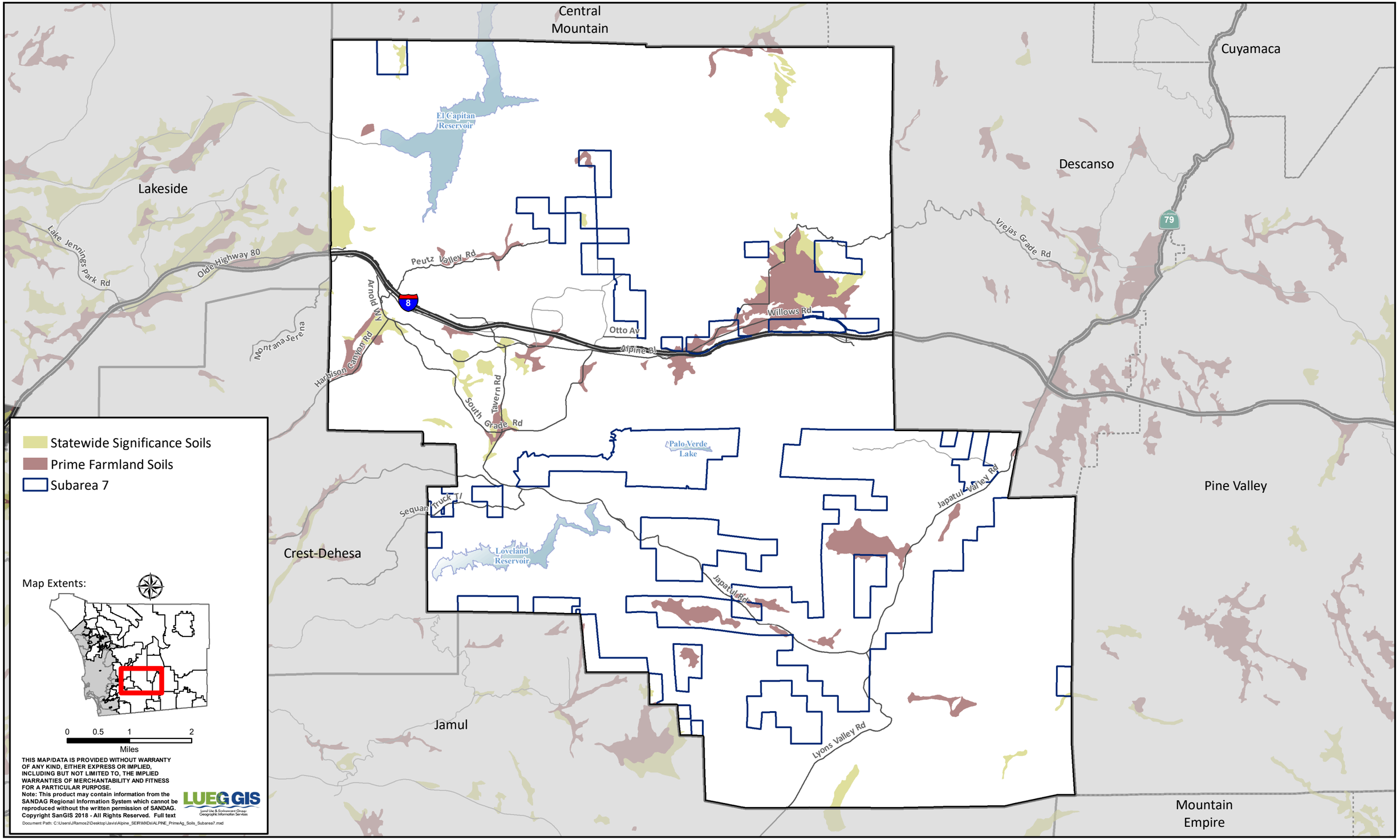
Source: SanGIS, County of San Diego, 2020

Figure 2.2-2b
County Identified Agricultural Lands
Subarea 7



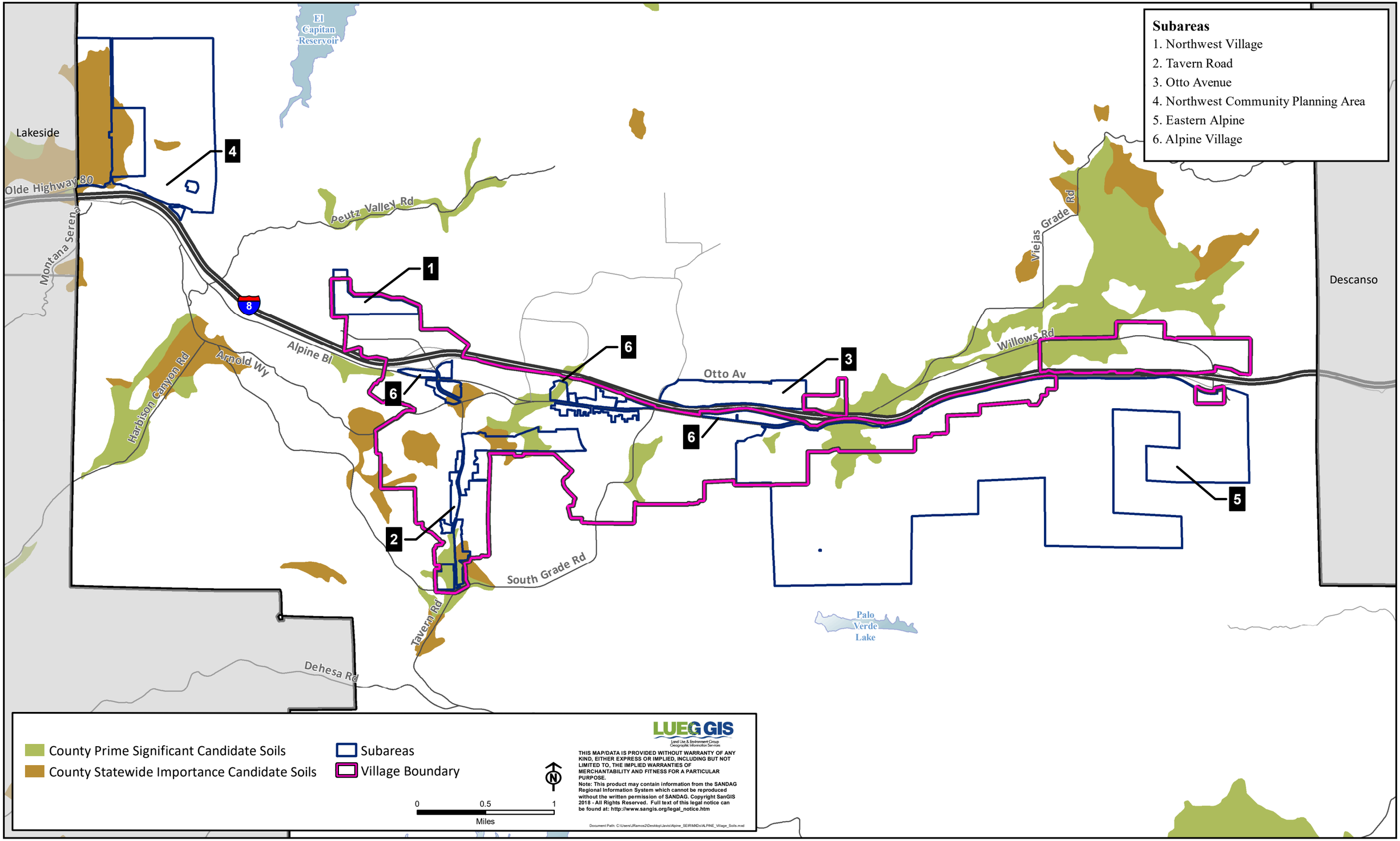
Source: SanGIS, County of San Diego, 2020

Figure 2.2-3a
FMMP Prime and Statewide Significant Soils
Subareas 1-6



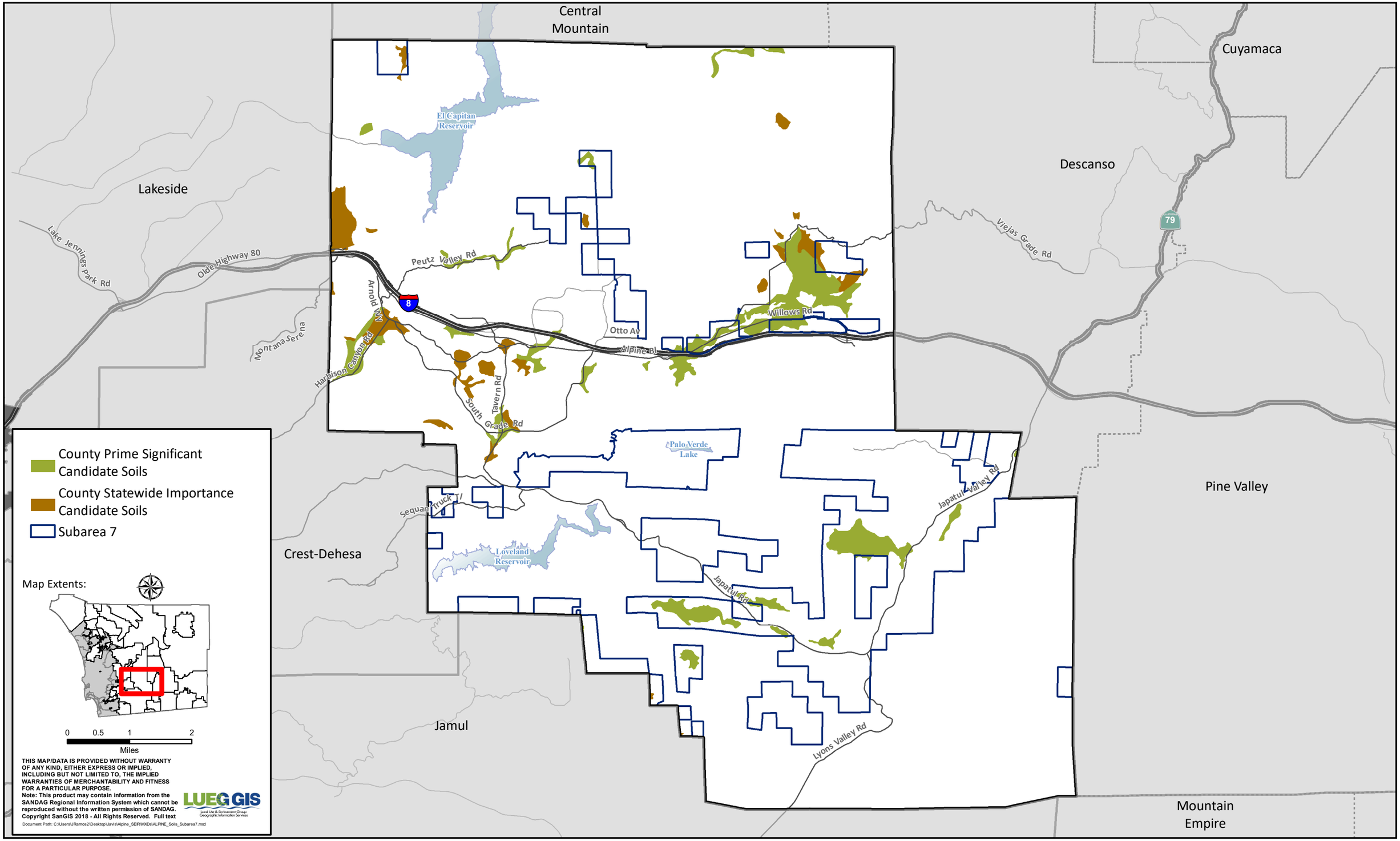
Source: SanGIS, County of San Diego, 2020

Figure 2.2-3b
FMMP Prime and Statewide Significant Soils
Subarea 7



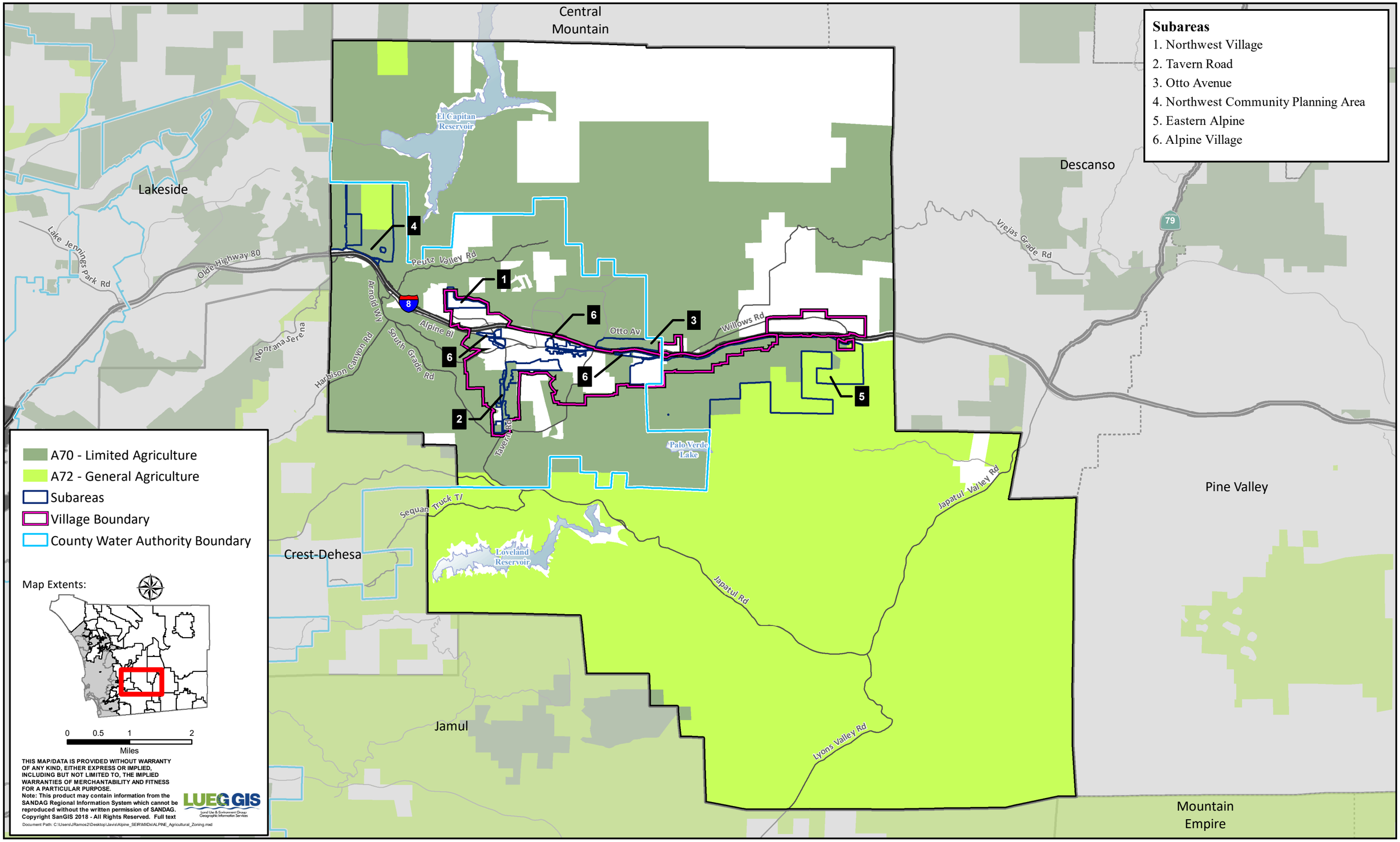
Source: SanGIS, County of San Diego, 2019

Figure 2.2-4a
County Prime and Statewide Significant Candidate Soils
Subareas 1-6



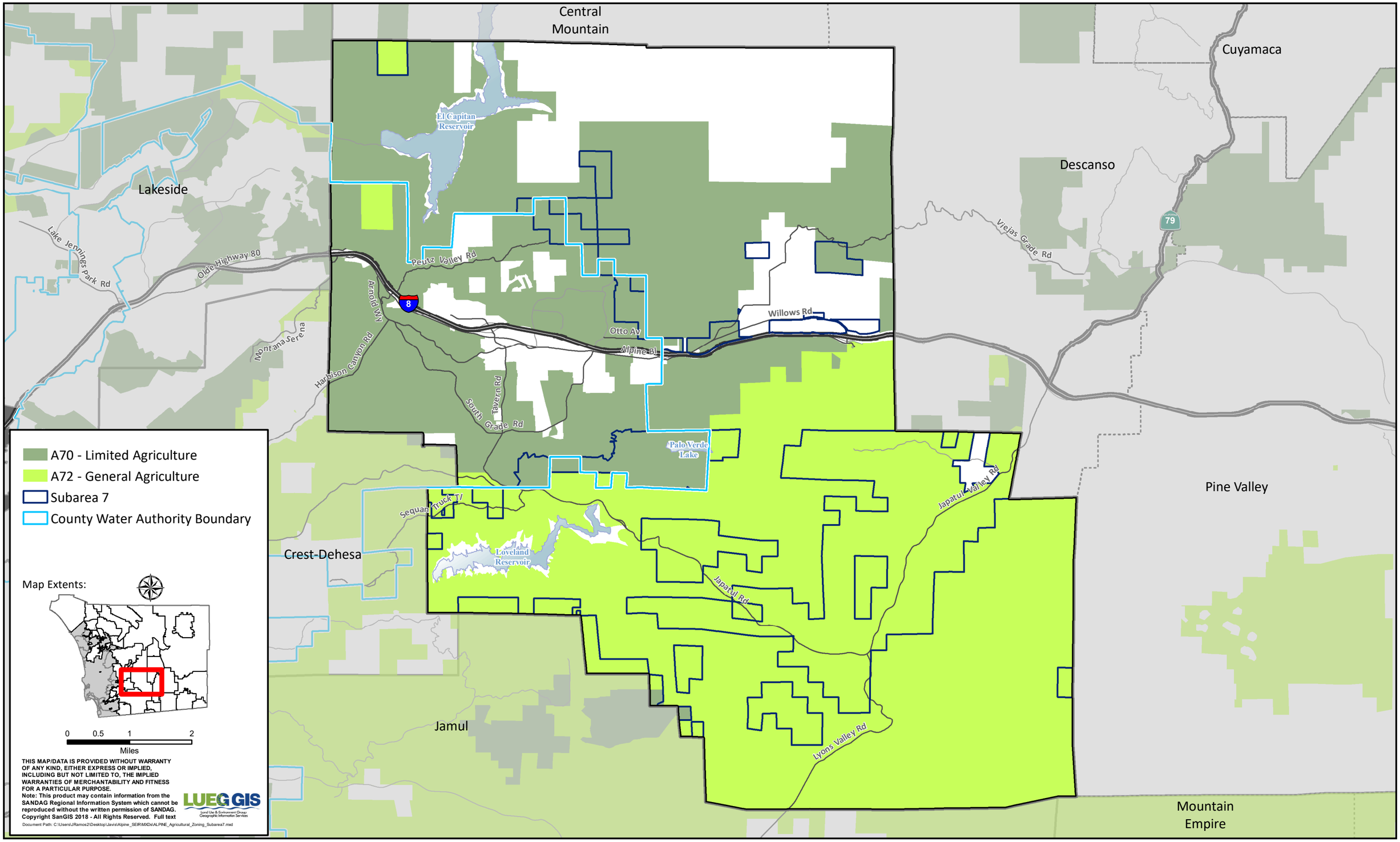
Source: SanGIS, County of San Diego, 2020

Figure 2.2-4b
County Prime and Statewide Significant Candidate Soils
Subarea 7



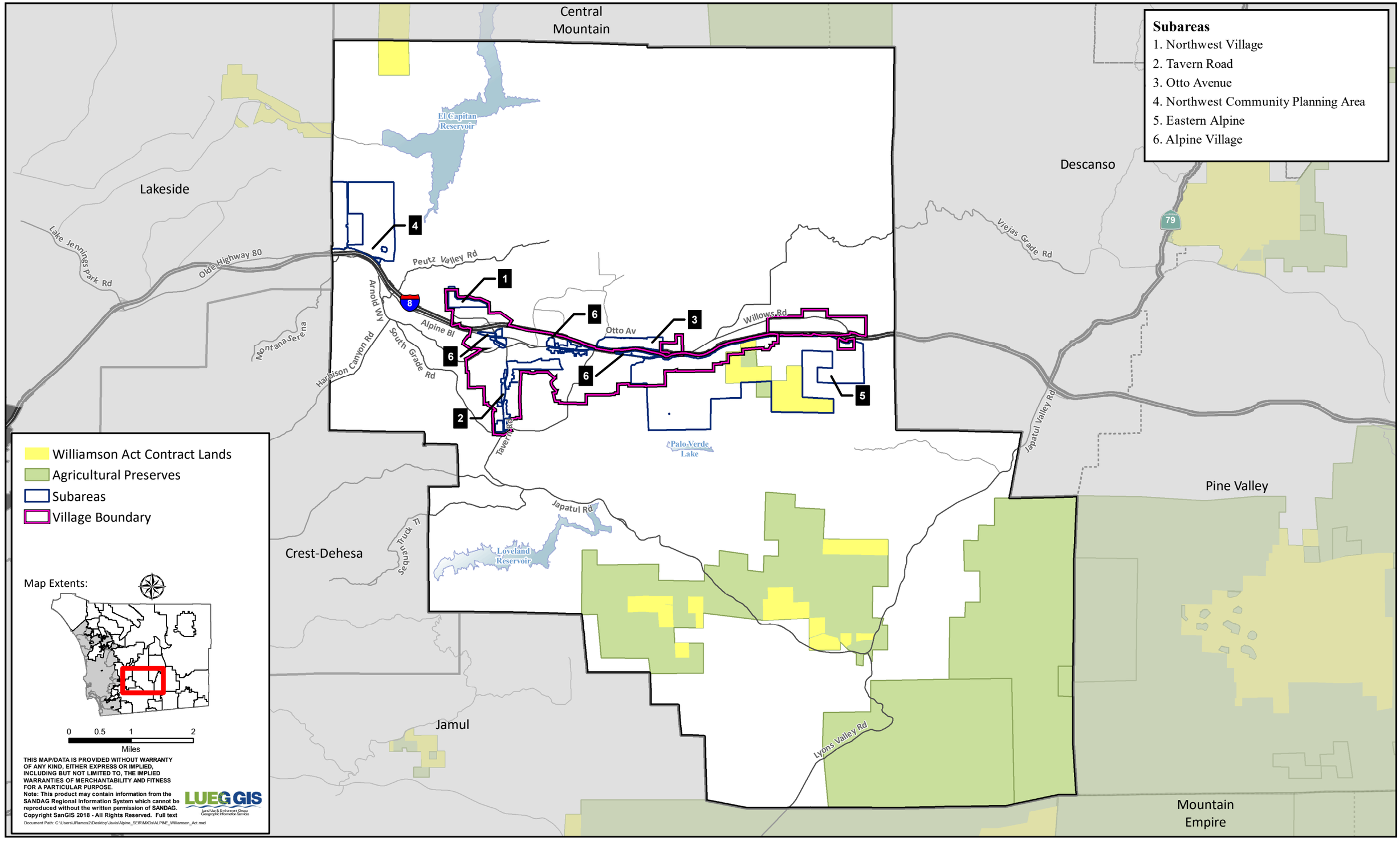
Source: SanGIS, County of San Diego, 2019

Figure 2.2-5a
Agricultural Zoning
Subareas 1-6



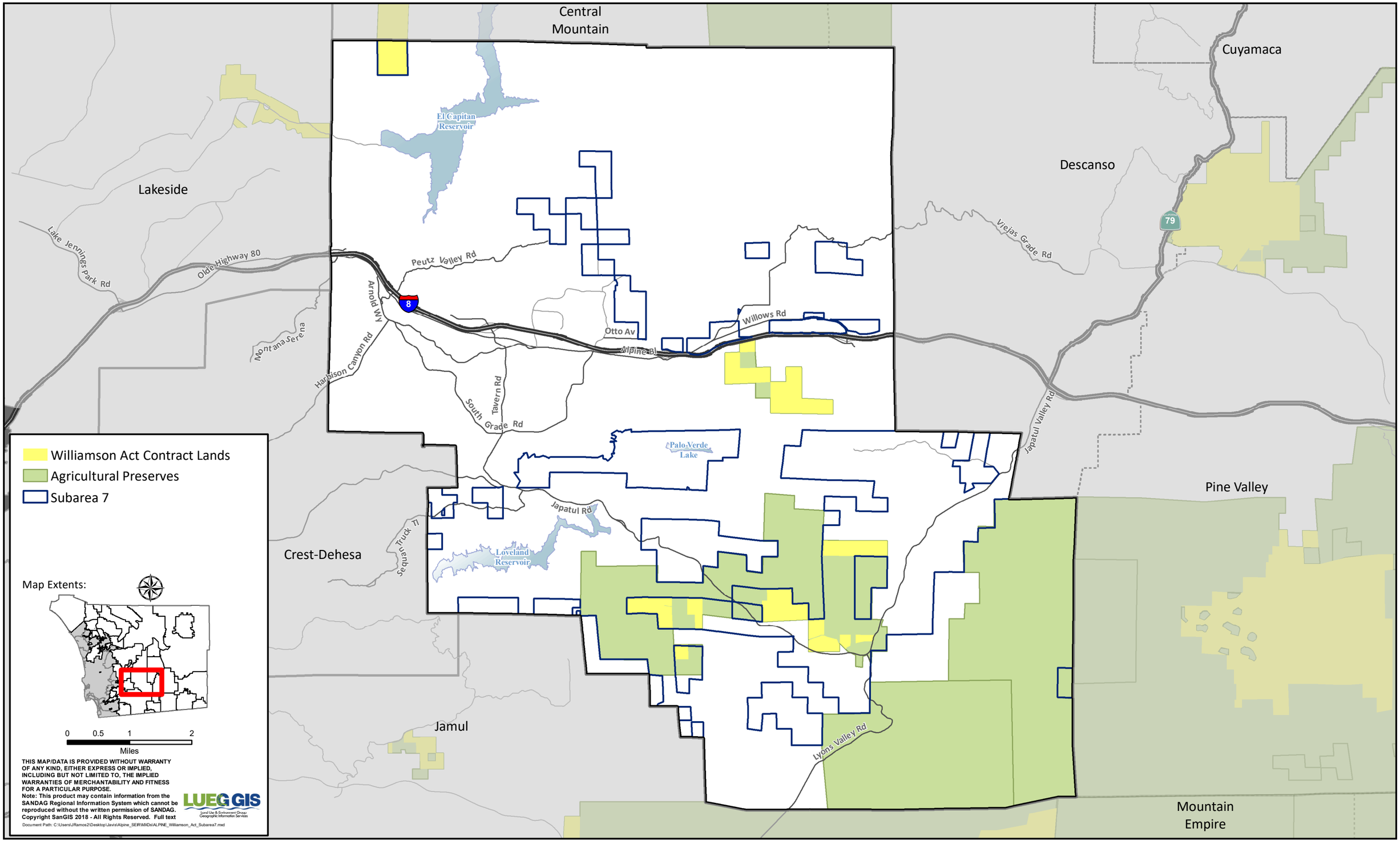
Source: SanGIS, County of San Diego, 2019

Figure 2.2-5b
Agricultural Zoning
Subarea 7



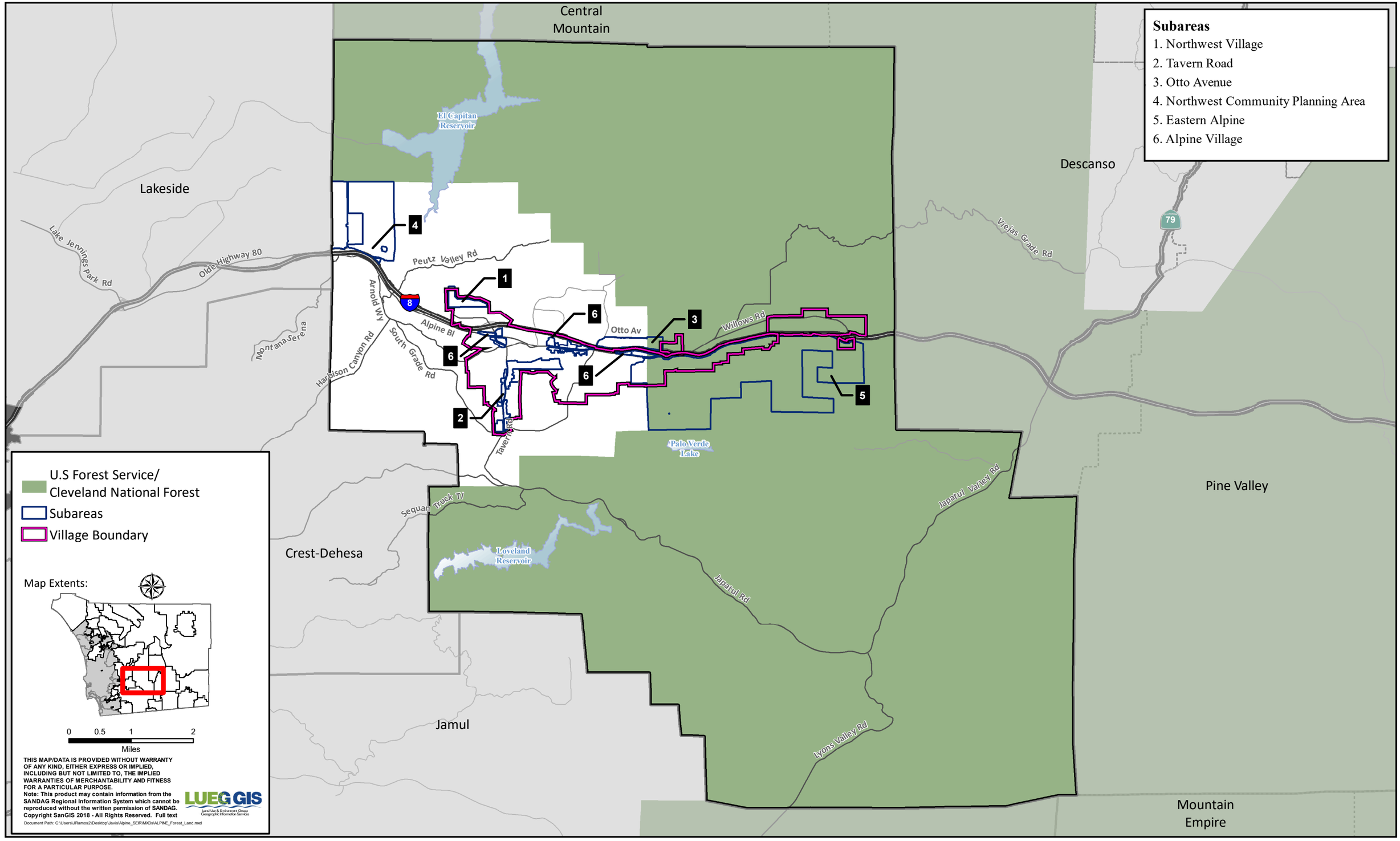
Source: SanGIS, County of San Diego, 2019

Figure 2.2-6a
Agricultural Preserves and Williamson Act Contracts
Subareas 1-6



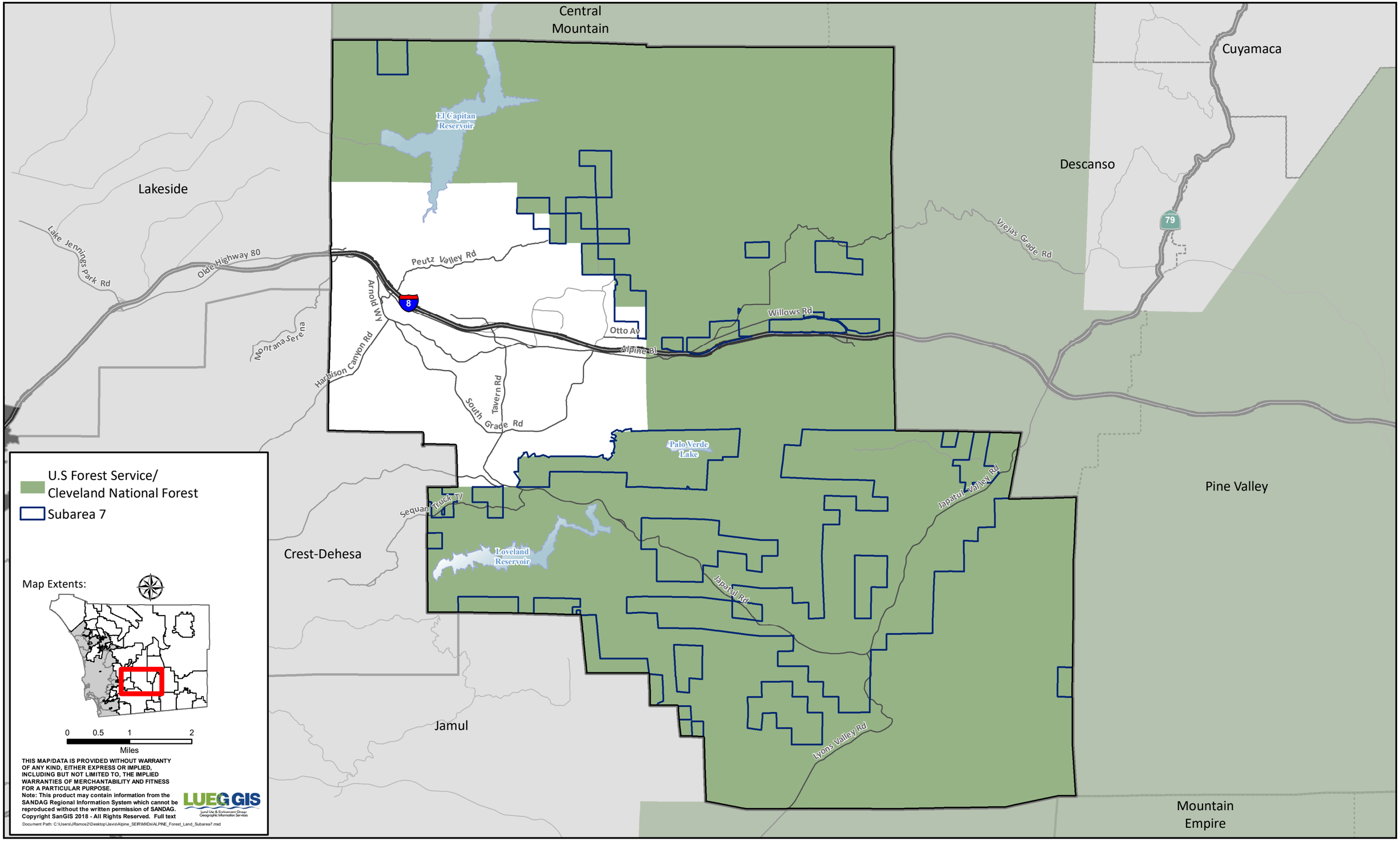
Source: SanGIS, County of San Diego, 2019

Figure 2.2-6b
Agricultural Preserves and Williamson Act Contracts
Subarea 7



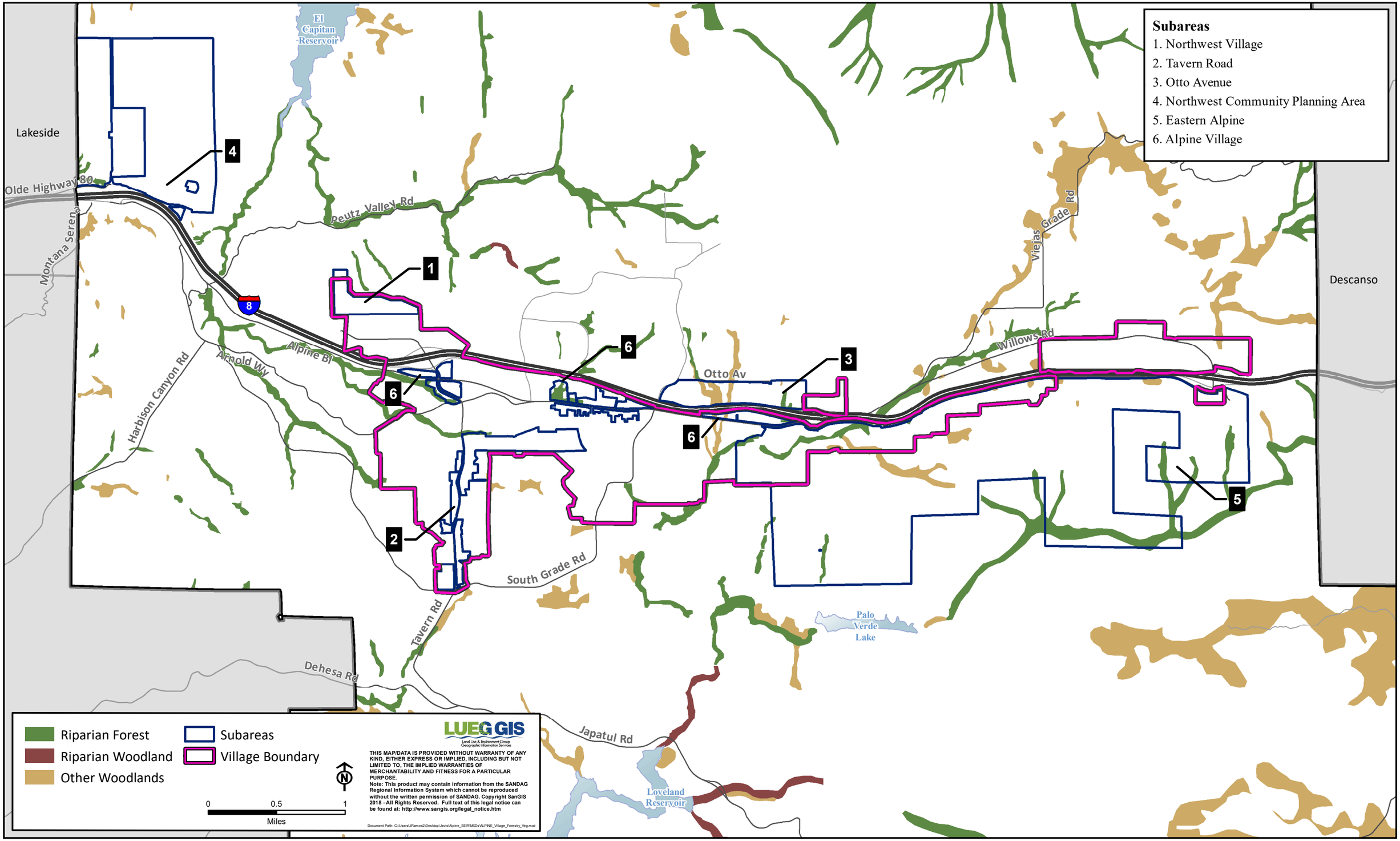
Source: SanGIS, County of San Diego, 2019

Figure 2.2-7a
Cleveland National Forest
Subareas 1-6



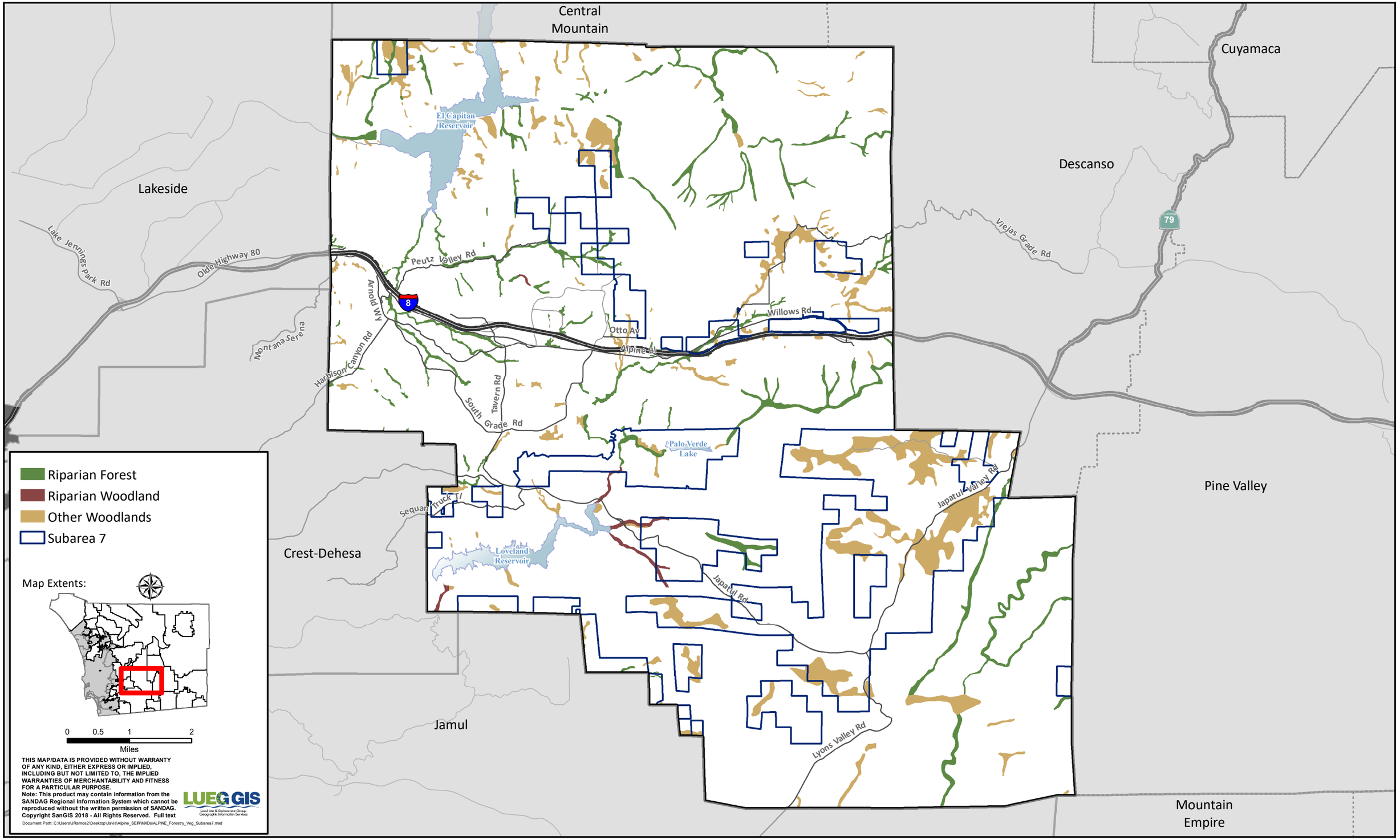
Source: SanGIS, County of San Diego, 2019

Figure 2.2-7b
Cleveland National Forest Lands
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.2-8a
Forestry Vegetation
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.2-8b
Forestry Vegetation
Subarea 7

2.3 Air Quality

This section of the Supplemental Environmental Impact Report (SEIR) includes a discussion of existing air quality conditions in the Alpine Community Plan Area (CPA), a summary of applicable air quality regulations, and an analysis on the potential short-term and long-term air quality impacts that could result from the Alpine Community Plan Update (CPU) (project). The air quality impact analysis is based on State CEQA Guidelines Appendix G and the County of San Diego *Guidelines for Determining Significance* for *Air Quality*. Mitigation measures are recommended as necessary to reduce significant air quality impacts to the extent feasible.

This section incorporates information and analysis from the 2011 General Plan EIR as it applies to the project. Section 1.3, Project Background, of this SEIR provides a background on both the 2011 General Plan EIR and the Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR. The 2011 General Plan EIR and supporting Air Quality Technical Report analyzed the entirety of the Alpine CPA while the FCI GPA EIR provided an updated analysis of impacts of land use changes within the former FCI lands. Only the 2011 General Plan EIR will be used for analysis of air quality due to the outcome of litigation of the FCI GPA. Goals, Policies, and Mitigation Measures from the 2011 General Plan and General Plan EIR are relevant to this section and will be referenced throughout. The 2011 General Plan EIR provided a comprehensive assessment of the air pollutants in San Diego County (herein referred to as the County), regulatory environment, potential future impacts of the project, and mitigation. This section analyzes the increase in density compared to the approved densities within the 2011 General Plan EIR ("Prior EIR").

Table 2.3-1 summarizes the impact conclusions identified in this section. The "Prior EIR Conclusion" is from the 2011 General Plan EIR only.

Table 2.3-1. Air Quality Summary of Impacts

Issue Number	Issue Topic	Prior EIR Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance after Mitigation
AQ-1	Air Quality Plans	Less than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
AQ-2	Air Quality Violations	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
AQ-3	Sensitive Receptors	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
AQ-4	Odors	Less than Significant	Less than Significant	Less than Significant	Less than Significant

Comments received in response to the Notice of Preparation (NOP) related to air quality included recommendations regarding land use development activities to reduce vehicle miles traveled (VMT) and emissions from on-road vehicles, including improving walkways and bicycle infrastructure to encourage walkable and bikeable community centers. These are addressed in this section.

A copy of the NOP and associated comment letters are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIR where applicable to the Alpine CPU (proposed project).

2.3.1 Existing Conditions

The Alpine CPA is located within the San Diego Air Basin (SDAB), which includes all of the County and is under the jurisdiction of the San Diego County Air Pollutant Control District (SDAPCD). The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the Alpine CPA are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources, as discussed separately below.

2.3.1.1 Climate, Meteorology, and Topography

The SDAB is bounded by the Pacific Ocean to the west and high mountain ranges to the east, which inhibit the dispersal of pollutants to the east. The region has a Mediterranean climate characterized by warm dry summers and mild, wet winters. Rainfall in the SDAB averages approximately 9 to 14 inches annually. During fall, the region often experiences dry, warm easterly winds, called Santa Ana winds, which raise temperatures and lower humidity.

The climate of the SDAB, as with all Southern California, is largely dominated by the strength and position of the semi-permanent high-pressure system over the Pacific Ocean, known as the Pacific High. This high-pressure ridge over the West Coast often creates a pattern of late-night and early-morning low clouds, hazy afternoon sunshine, daytime onshore breezes, and little temperature variation year-round.

Two types of high-pressure cells called subsidence and radiation inversions affect air quality in the SDAB and trap the dispersion of pollutants, resulting in temporary degradation of air quality. Inversion layers occur often in the region during which air temperatures get warmer rather than cooler with increasing height. Inversion layers inhibit the dispersion of pollutants, resulting in a temporary degradation of air quality in the region.

The local meteorology of the Alpine CPA is represented by measurements recorded at the Western Regional Climate Center (WRCC) Alpine Station. The average annual precipitation is approximately 16.15 inches. January temperatures range from an average minimum of 42.4 degrees Fahrenheit (°F) to an average maximum of 65.4°F. July temperatures range from an average minimum of 60.1°F to an average maximum of 90.0°F (WRCC 2020a). The predominant wind direction is from the west (WRCC 2020b).

2.3.2 Air Quality Setting

Criteria Air Pollutants

Concentrations of ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead are used as indicators of ambient air quality conditions and are referred to as criteria air pollutants. Criteria air pollutants are air pollutants for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set by the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB).

A brief description of each criteria air pollutant's source types and health effects is provided below in Table 2.3-2. Additional information, including future trends and monitoring data at those monitoring stations located closest to the project site, is provided for ozone, NO_2, and PM, the key criteria air pollutants associated with the project analysis.

Table 2.3-2. Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute Health Effects[1]	Chronic Health Effects[2]
Ozone	Secondary pollutant resulting from reaction of volatile organic compounds (VOC) and oxides of nitrogen (NO_X) in presence of sunlight. VOC emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels.	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide	Incomplete combustion of fuels; motor vehicle exhaust	Headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide	Combustion devices; e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	Coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	Chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	Combustion devices (e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines), industrial processes, and fires	Irritation of upper respiratory tract, increased asthma symptoms, aggravation of existing heart disease leading to death	Chronic bronchitis, emphysema
Respirable particulate matter, Fine particulate matter	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and VOC	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	Alterations to the immune system, carcinogenesis

Pollutant	Sources	Acute Health Effects[1]	Chronic Health Effects[2]
Lead	Metal processing, piston-engine aircraft or other vehicles operating on leaded fuel	Reproductive/ developmental effects (fetuses and children)	Numerous effects including neurological, endocrine, and cardiovascular effects

Notes:
Source: EPA 2019
[1] "Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.
[2] "Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower ambient concentrations.

Ozone

Ground-level ozone is not emitted directly into the air but is created by chemical reactions between volatile organic compounds (VOC) and oxides of nitrogen (NO_X). This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Ozone at ground level is a harmful air pollutant because of its effects on people and the environment, and it is the main ingredient in smog (EPA 2016).

Acute health effects of ozone exposure include increased respiratory and pulmonary resistance, cough, pain, shortness of breath, and lung inflammation. Chronic health effects include permeability of respiratory epithelia and possibility of permanent lung impairment (EPA 2016). Emissions of the ozone precursors VOC and NO_X have decreased over the past two decades because of more stringent motor vehicle standards and cleaner burning fuels (CARB 2013).

Carbon Monoxide

CO is an odorless and invisible gas. It is a non-reactive pollutant that is a product of incomplete combustion of gasoline in automobile engines. CO is a localized pollutant, and the highest concentrations are found near the source. Ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic and are influenced by wind speed and atmospheric mixing. When inhaled at high concentrations, CO reduces the oxygen-carrying capacity of the blood, which, in turn, results in reduced oxygen reaching parts of the body.

Nitrogen Dioxide

NO_2 is a brownish, highly reactive gas that is present in all urban environments. The major human-made sources of NO_2 are combustion devices, such as boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2. The combined emissions of NO and NO_2 are referred to as NO_X and are reported as equivalent NO_2. Because NO_2 is formed and depleted by reactions associated with photochemical smog (ozone), the NO_2 concentration in a geographical area may not be representative of the local sources of NO_X emissions (EPA 2019).

Acute health effects of exposure to NO_X includes coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis, or pulmonary edema, breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, and death. Chronic health effects include chronic bronchitis and decreased lung function (EPA 2016).

Sulfur Dioxide

SO_2 is produced by such stationary sources as coal and oil combustion, steel mills, refineries, and pulp and paper mills as well as by the combustion of fuel-containing sulfur. The major adverse health effects associated with SO_2 exposure pertain to the upper respiratory tract. SO_2 is a respiratory irritant with constriction of the bronchioles occurring with inhalation of SO_2 at 5 parts per million (ppm) or more (CDC 1978). On contact with the moist mucous membranes, SO_2 produces sulfurous acid, which is a direct irritant. Concentration rather than duration of the exposure is an important determinant of respiratory effects. Exposure to high SO_2 concentrations may result in edema of the lungs or glottis and respiratory paralysis.

Particulate Matter

PM_{10} consists of particulate matter emitted directly into the air, such as fugitive dust, soot, and smoke from mobile and stationary sources, construction activity, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors. $PM_{2.5}$ includes a subgroup of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. PM_{10} emissions are dominated by emissions from area sources, primarily fugitive dust from vehicle travel on unpaved and paved roads, farming operations, construction and demolition, and particles from residential fuel combustion (CARB 2013).

Acute health effects of PM_{10} exposure include breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, and premature death. Chronic health effects include alterations to the immune system and carcinogenesis (EPA 2016).

Lead

Lead is a metal found naturally in the environment as well as in manufactured products and is a potent neurotoxin that can cause increased chances of cancer and non-cancer health effects for adults and children. Lead is known to negatively affect child brain development and function. The major sources of lead emissions have historically been mobile and industrial sources but can occur in dust created by demolition or deterioration of lead-based paint. Lead-based paint is present on buildings built before EPA's ban on the use of such paint in 1978. EPA also phased out leaded fuels as of December 1995 resulting in an 89 percent decline in lead emissions from mobile sources between 1980 and 2010 (EPA 2016; CARB 2001).

Criteria Air Pollutants from Wildfires

Wildfires have occurred and currently continue to occur in the project vicinity. Most recently, the Valley Fire occurred in September 2020, burning 16,390 acres of wildland in the Cleveland National Forest near the Alpine CPA (Cleveland National Forest 2020). Wildfires produce smoke, which is comprised of a complex mixture of carbon dioxide (CO_2), water vapor, CO, particulate matter, hydrocarbons and other organic chemicals, ROG, NO_X, and trace minerals. The primary criteria air pollutant of concern from smoke is $PM_{2.5}$ which can be transported a significant distance from the burn site and cause adverse health impacts because of their ability to penetrate more deeply into lung tissue. Although wildfire hazards are known to occur in and near the Alpine CPA, estimates of criteria pollutants from these hazards are not typically incorporated into plan-level air quality analyses because they occur intermittently, rather than year-to-year at a predictable frequency. The prevention of and preparation for wildfires, as addressed in Chapter 2.7, *Wildfire*, would play a key role in minimizing future criteria air pollutant emissions occurring within and near the Alpine CPA.

Monitoring Station Data and Attainment Designations

Air quality at a given location can be described by units of concentration that are generally expressed in ppm or micrograms per cubic meter. Both CARB and EPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants (attainment designations are summarized below in Table 2.3-4). Table 2.3.4 of the 2011 General Plan EIR presents background ambient air quality concentrations within the SDAB from 2003 to 2007, which were the latest years of data available at the time of the environmental analysis. Since preparation of the 2011 General Plan EIR, CARB has current monitoring data available through 2018. Table 2.3-3 presents updated ambient air quality concentrations from the Alpine-Victoria Drive and El Cajon-Lexington Elementary School stations from the three most recent years of data available at the time of this writing. The Alpine-Victoria Drive station, which is within the Alpine CPA, monitors ozone, $PM_{2.5}$, and NO_2; the El Cajon-Lexington Elementary station (approximately 5 miles to the west of the Alpine CPA) is the closest station to the Alpine CPA that monitors PM_{10}. Because neither of these CARB stations monitor CO or SO_2, ambient concentrations of these pollutants were obtained from the EPA stations closest to the community of Alpine, both of which are within the City of El Cajon (533 First Street [Lexington Elementary] and 10537 Floyd Smith Drive) approximately 8 miles to the west of the Alpine CPA.

Table 2.3-3 indicates that the Alpine-Victoria Drive station has experienced frequent violations of the State and federal ozone standards. The Alpine-Victoria Drive station location is intended to monitor maximum ozone concentrations occurring downwind from the area of maximum precursor emissions. For this reason, the highest ozone levels within the air basin are recorded at this monitoring station each year (SDAPCD 2018a). Despite the growth in population, the SDAB has generally experienced improvements in ambient air quality; for instance, the number of exceedances of the State's 1-hour ozone standard has decreased from 18 days in 2007 to 2 days in 2018. The number of exceedances of the national 24-hour $PM_{2.5}$ standard has decreased from 11.4 expected days in 2007 to zero days during the 2016–2018 period (CARB 2018).

Since certification of the 2011 General Plan EIR, the SDAPCD adopted an update to the previous regional air quality strategy (RAQS) in 2016. The 2016 RAQS lays out the feasible emission control standards, actions, and regulations to bring the region into attainment for the National Ambient Air Quality Standard (NAAQS) and California Ambient Air Quality Standard (CAAQS), which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health (SDAPCD 2016a, 2016b). As shown in Table 2.3-4, the SDAB is currently designated as a "nonattainment" area for the federal and State ozone standards and the State PM_{10} and $PM_{2.5}$ standards.

Table 2.3-3. Ambient Air Quality Concentrations for the Alpine CPA

Pollutant	Monitoring Year		
	2016	2017	2018
Ozone (Alpine-Victoria Drive station) [1]			
Maximum Concentration (1-hr/8-hr, ppm)	0.104/0.091	0.109/0.095	0.0102/0.082
Number of days State standard exceeded (1-hr/8-hr)	6/29	11/48	2/20
Number of days federal standard exceeded (8-hr)	13	26	7
Carbon Monoxide (El Cajon-Lexington Elementary and Floyd Smith Drive)[2]			
Maximum Concentration (1-hr/8-hr, ppm)	1.6/1.3	1.4/1.3	1.4/1.1
Number of days CAAQS exceeded (1-hr/8-hr)	0/0	0/0	0/0
Number of days NAAQS exceeded (1-hr/8-hr)	0/0	0/0	0/0
Respirable Particulate Matter (El Cajon-Lexington Elementary School and Floyd Smith Drive)			
Maximum Concentration (24-hr/annual average, µg/m^3)	43.0/--	50.0/23.0	43.0/23.0
Annual Average (µg/m^3)	--	23.0	23
Number of days CAAQS exceeded	0	0	0
Number of days NAAQS exceeded	--	0	0
Fine Particulate Matter (Alpine-Victoria Drive)			
Maximum concentration (24-hr/annual average, µg/m^3)	19.3/7.3	16.4/--	29.7/--
Number of days NAAQS exceeded	--	--	--
Nitrogen Dioxide (Alpine-Victoria Drive)			
Maximum concentration (1-hr, ppb)	33.0	28.0	31.0
Number of days NAAQS exceeded	0	0	0
Number of days CAAQS exceeded	0	0	0
Sulfur Dioxide (El Cajon-Lexington Elementary and Floyd Smith Drive)[2]			
Maximum concentration (1-hr/24-hr, ppb)	0.6/0.2	1.1/0.4	3.5/0.4
Number of days NAAQS exceeded (1-hr/24-hr)	0/0	0/0	0/0
Number of days CAAQS exceeded (1-hr/24-hr)	0/0	0/0	0/0

Notes: "—" = not available; ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; EPA = United States Environmental Protection Agency; NAAQS = National Ambient Air Quality Standard; CARB = California Air Resource Board

Sources: CARB 2018, EPA 2018

[1] The Alpine-Victoria Drive monitoring station did not record Respirable Particulate Matter data for the years 2016 and 2017. PM_{10} data is instead presented from the El Cajon-Lexington Elementary School monitoring station, the next closest station to the community of Alpine.

[2] Site identification for these stations under the EPA Air Quality System are #060731022 and #060731018, respectively. The El Cajon-Floyd Smith station was closed in late 2016. Monitoring is now performed at Lexington Elementary School (533 First Street) only. 2016 data is from El Cajon-Floyd Smith; 2017 and 2018 data is from Lexington Elementary.

Table 2.3-4. Attainment Status Designations for San Diego County

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Attainment[1]	Nonattainment
Carbon Monoxide	Attainment	Attainment
Respirable Particulate Matter	Unclassifiable[2]	Nonattainment
Fine Particulate Matter	Attainment	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide[3]	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility-reducing Particles	No Federal Standard	Unclassified

Source: San Diego County Air Pollution Control District [SDAPCD] no date

[1] The federal 1-hour standard of 12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

As discussed above, the CAAQS and NAAQS represent concentration limits of criteria air pollutants needed to adequately protect human health and the environment. Existing violations of the ozone and particulate matter ambient air quality standards indicate that certain individuals exposed to this pollutant may experience certain health effects, including increased incidence of acute and chronic cardiovascular and respiratory ailments.

Toxic Air Contaminants

Toxic air contaminants (TACs) are also used to indicate the quality of ambient air. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the *California Almanac of Emissions and Air Quality*, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (diesel PM) (CARB 2013). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Diesel PM poses the greatest health risk among these 10 TACs mentioned. Based on receptor modeling techniques, CARB estimated its health risk to be 420 excess cancer cases per million people in the SDAB in the year 2000 (CARB 2009). Overall, statewide emissions of diesel PM are forecasted to decline by 71 percent between 2000 and 2035 (CARB 2014).

Odors

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant or a coffee roaster). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, and food packaging plants. No odor sources of concern specified currently exist in or adjacent to the Alpine CPA.

Sensitive Receptors

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, childcare facilities, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increase and prolonged exposure of individuals to pollutants.

Residential receptors are located throughout the Alpine CPA. The highest density housing (dwelling unit/acre) occurs in the Alpine Village (Subarea 6), adjacent to Interstate 8 (I-8). Nonresidential receptors in the Alpine CPA include various hospitals and schools. New residences, along with other sensitive receptors (e.g., schools, hospitals), would be constructed as part of the project and located throughout the CPA in each of the seven subareas. Table 2.3-5 summarizes the types of nonresidential receptors within the Alpine CPA.

2.3.3 Regulatory Framework

Air quality in the Alpine CPA is regulated through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, planning, policymaking, education, and a variety of programs. The agencies responsible for improving the air quality within and in the vicinity of the Alpine CPA are described below.

Table 2.3-5. Nonresidential Sensitive Receptors within the Alpine CPA

Name	Type
Alpine Children's Academy	Daycare Center
Alpine Christian School	School
Alpine Community Day School	Daycare Center
Alpine Country Care Club	Resident Care Facility
Alpine Country Day School	Daycare Center
Alpine View Lodge	Resident Care Facility
Boulder Oaks Elementary	School
Creekside Early Learning Center	School
Joan MacQueen Middle School	School
Joyful Heart Learning Center	School
Kasitz Kastle	Resident Care Facility
Kinder Academy	Daycare Center
Little Pioneers Preschool	School
Los Coches Creek Middle School	School
Mountain View Learning Academy	School
Shadow Hills Elementary	School
The Heights Charter	School

2.3.3.1 Federal

Criteria Air Pollutants

At the federal level, the EPA implements national air quality programs. EPA air quality mandates are drawn primarily from the federal Clean Air Act (CAA), enacted in 1970. The most recent major amendments were made by Congress in 1990.

The CAA requires the EPA to establish NAAQS. As shown in Table 2.3-6, EPA has established NAAQS for the following criteria air pollutants: ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead (CARB 2016). The primary standards protect public health and the secondary standards protect public welfare. The CAA also requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The federal Clean Air Act Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA reviews all state SIPs to determine whether they conform to the mandates of the CAA and its amendments and whether implementing them will achieve air quality goals. If EPA determines a SIP to be inadequate, a Federal Implementation Plan that imposes additional control measures may be prepared for the nonattainment area. If the state fails to submit an approvable SIP, sanctions may be applied to transportation funding and stationary air pollution sources in the air basins.

Table 2.3-6. Federal and State Ambient Air Quality Standards

Criteria Pollutant	Averaging Time	CAAQS	NAAQS[1]	
			Primary	Secondary
Ozone	1-hour	0.09 ppm	None[2]	None[2]
	8–hour	0.070 ppm	0.070 ppm	0.070 ppm
Respirable Particulate Matter (PM_{10})	24-hour	50 μg/m^3	150 μg/m^3	150 μg/m^3
	Annual Arithmetic Mean	20 μg/m^3	None	None
Fine Particulate Matter ($PM_{2.5}$)	24-hour	None	35 μg/m^3	35 μg/m^3
	Annual Arithmetic Mean	12 μg/m^3	12 μg/m^3	15 μg/m^3
Carbon Monoxide	8-hour	9.0 ppm	9 ppm	None
	1-hour	20 ppm	35 ppm	None
Nitrogen Dioxide	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	0.053 ppm
	1-hour	0.18 ppm	0.100 ppm	None
Sulfur Dioxide[3]	Annual Arithmetic Mean	None	0.030 ppm	None
	24-hour	0.04 ppm	0.14 ppm	None
	1-hour	0.25 ppm	0.075 ppm	None
Lead	30-day Average	1.5 μg/m^3	None	None
	Calendar quarter	None	1.5 μg/m^3	1.5 μg/m^3
	Rolling 3-month average	None	0.15 μg/m^3	0.15 μg/m^3
Sulfates	24-hour	25 μg/m^3	None	None
Visibility-reducing Particles	8-hour	--[4]	None	None
Hydrogen Sulfide	1-hour	0.03 ppm	None	None
Vinyl Chloride	24-hour	0.01 ppm	None	None

Source: CARB 2016

ppm= parts per million; μg/m^3 = micrograms per cubic meter; NAAQS = National Ambient Air Quality Standard; CAAQS = California Ambient Air Quality Standard

[1] National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

[2] The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for State Implementation Plans.

[3] The annual and 24-hour NAAQS for sulfur dioxide only apply for 1 year after designation of the new 1-hour standard to those areas that were previously in nonattainment for 24-hour and annual NAAQS.

[4] CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particles when relative humidity is less than 70 percent.

Toxic Air Contaminants and Hazardous Air Pollutants

Air quality regulations also focus on TACs (also known as hazardous air pollutants [HAPs] in federal regulations). In general, for those TACs that may cause cancer, all concentrations present some risk and there is no safe level of exposure. In other words, there is no threshold level below which adverse health impacts may not be expected to occur.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis or genetic

damage; or short-term acute affects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants, for which acceptable levels of exposure can be determined and for which ambient standards have been established. Cancer risk from TACs is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure.

EPA regulates HAPs through its National Emission Standards for Hazardous Air Pollutants. The standards for a particular source category require the maximum degree of emission reduction that the EPA determines to be achievable, which is known as the Maximum Achievable Control Technology standards. These standards are authorized by Section 112 of the 1970 CAA and the regulations are published in Title 40 of the Code of Federal Regulations Parts 61 and 63.

Safer Affordable Fuel-Efficiency Vehicles Rule

In August 2019, EPA and the National Highway Traffic Safety Administration jointly published a notice of proposed rulemaking for Part One of the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). The SAFE Rule proposes new and amended carbon dioxide (CO_2), Corporate Average Fuel Economy, and greenhouse gas (GHG) emissions standards for passenger cars and light trucks. Additionally, Part One of the SAFE Rule withdraws California's waiver, afforded under the CAA to set GHG and zero-emissions vehicle standards separate from the federal government. Part One of the SAFE Rule became effective in November 2019. In March 2020, Part Two of the SAFE Rule was issued which sets amended fuel economy and CO_2 standards for passenger cars and light trucks for model years 2021 through 2026. Part Two became effective 60 days after publication in the Federal Register. CARB has prepared off-model adjustment factors for the Emissions Factor model (EMFAC) to account for the impact of the SAFE Rule. These adjustment factors account for changes in pollutant estimates from mobile sources for NO_2, PM_{10} and $PM_{2.5}$, CO, and CO_2, and were applied within this analysis to account for the potential changes to estimated vehicle emissions as a result of the SAFE Rule.

2.3.3.2 State

CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish the CAAQS (Table 2.3-6).

Criteria Air Pollutants

CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants (Table 2.3-6). In most cases, the CAAQS are more stringent than the NAAQS. Differences in the standards are generally explained by the health effects studies considered during the standard-setting process and the interpretation of the studies. In addition, the CAAQS incorporate a margin of safety to protect sensitive individuals.

The CCAA requires all local air districts in the State endeavor to attain and maintain the CAAQS by the earliest date practical. The CCAA specifies local air districts focus particular attention on reducing the emissions from transportation and area-wide emission sources. The CCAA also provides air districts with the authority to regulate indirect emission sources.

Toxic Air Contaminants

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807, Chapter 1047, Statutes of 1983) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review are required before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted EPA's list of HAPs as TACs. Most recently, diesel PM was added to CARB's list of TACs.

After a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the measure must incorporate best available control technology for toxics to minimize emissions.

Stationary Sources

The Hot Spots Act requires existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

Vehicular Sources

CARB has adopted diesel exhaust control measures and more stringent emissions standards for various transportation-related mobile sources of emissions, including transit buses, and off-road diesel equipment (e.g., tractors, generators). Over time, the replacement of older vehicles will result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1,3-butadiene, diesel PM) have been reduced significantly over the last decade and will be reduced further in California through a progression of regulatory measures (e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies. The CARB Risk Reduction Plan provides the agency's proposal for comprehensive strategies to reduce diesel PM emissions in the State and was most recently updated in 2000. Through this Risk Reduction Plan, it is expected that diesel PM concentrations will be 85 percent less in 2020 in comparison to year 2000 (CARB 2000). It is anticipated that CARB will prepare an update to this Risk Reduction Plan that will identify if the diesel PM reduction goals have been achieved in 2020. Adopted regulations are also expected to continue to reduce formaldehyde emissions emitted by cars and light-duty trucks. As emissions are reduced, it is expected that risks associated with exposure to the emissions will also be reduced.

Off-Road Construction Equipment

Any project using off-road vehicles that are diesel-powered, self-propelled, and 25 horsepower or greater, must be registered under the current owner with the CARB Diesel Off-Road Online Reporting System. Each registered vehicle is assigned an Equipment Identification Number which must be labeled on both sides of the vehicle, and all off-road vehicle fleets must demonstrate compliance with CARB emissions targets for off-road, diesel-powered vehicles. Further, CARB requires that off-road vehicles limit their unnecessary idling to five minutes unless idling is necessary to perform work (i.e. crane operation providing hydraulic power), the vehicle is being serviced, or the vehicle is in a queue waiting for work. Medium and large fleets must have a written idling policy that is made available to operators of the vehicles.

2.3.3.3 Local

San Diego County Air Pollution Control District

The SDAPCD is the local agency authorized to regulate air quality sources within the County and the SDAB to protect public health and welfare through the administration of federal and State air quality laws and policies. The clean air strategy of SDAPCD includes preparing plans and programs for the attainment of ambient air quality standards, adopting and enforcing rules and regulations, and issuing permits for stationary sources. In accordance with the CAA and CCAA, SDAPCD maintains the region's portion of the SIP and the RAQS for federal and State ozone standards. SDAPCD rules and regulations relevant to air quality in the Alpine CPA are described below.

Equipment Potentially Requiring Permits

SDAPCD's permitting system has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. Rule 10, *Permits Required*, requires that any person building, erecting, altering, or replacing any article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain written authorization for such construction from SDAPCD. Rule 11, *Exemptions*, lists exemptions for equipment or processes that have been determined to not emit significant amounts of air pollutants.

Visible Emissions

Rule 50, *Visible Emissions*, regulates the discharge of any air contaminant other than water vapor from construction and operational activities. This rule requires that persons or projects shall not discharge air emissions for more than three minutes in any period of 60 consecutive minutes, which is darker in shade than that designated as Number 1 on the Ringelmann Chart, and that no emissions are a degree greater than Number 1 on the Ringelmann Chart. This rule provides additional provisions for specific construction activities or uses.

Nuisance

Rule 51, *Nuisance*, requires that no person shall discharge from any source air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or which endanger the comfort, repose, health or safety of any persons.

Fugitive Dust Control

Rule 55, *Fugitive Dust Control*, regulates fugitive dust emissions associated with construction or demolition activities for projects in the County, including active operations, open storage piles, and inactive disturbed areas. Specifically, Rule 55 requires that:

- No construction or demolition activities will result in discharged of visible dust emissions beyond property lines; and
- Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall be minimized through track-out/carry-out and erosion control measures and shall be removed at the conclusion of each workday.

Architectural Coatings

Rule 67.0.1, *Architectural Coatings*, regulates the application of any architectural coatings within the County. As it relates to the Alpine CPU, this rule requires that the VOC content of coatings not exceed 50 grams per liter for flat coatings, 100 grams per liter for nonflat coatings, and 150 grams per liter for nonflat-high gloss coatings.

Asbestos

Rule 1206, *Asbestos Removal, Renovation, and Demolition* requires projects that propose renovation or demolition to conduct building surveys to determine if asbestos is present. Asbestos is a known human carcinogen and the primary route of exposure is through inhalation of asbestos fibers. As such, Rule 1206 incorporates the federal asbestos requirements identified in the EPA's *National Emission Standards for Hazardous Air Pollutants* and includes additional requirements to minimize exposure to asbestos fibers. If more than 100 square feet of asbestos-containing materials are identified and would be disturbed through demolition, projects must receive permits from SDAPCD to conduct related activities and ensure that all waste handling and disposal is in compliance with this rule.

County of San Diego

General Plan Policies

The 2011 General Plan Conservation and Open Space Element includes Goal COS-14 regarding land use development, which implements policies designed to reduce emissions of criteria air pollutants while protecting public health. This goal is supported by Policies COS-14.1 through COS-14.12, which include requirements for new development design and construction methods to minimize impacts to air quality; encourage future development to reduce vehicular trips by utilizing compact regional and community-level development patterns; encourage new development to reduce air pollution by incorporating a mixture of uses within villages and rural town centers that encourage people to walk, bicycle, or use public transit; minimize land use conflicts that expose people to significant amounts of air pollution; support transportation management programs that reduce the use of single-occupancy vehicles; and encourage the use of low emission vehicles and equipment to improve air quality and reduce GHG emissions.

Dust Control Measures

County Code Section 87.428 *Dust Control Measures*, requires all clearing and grading to be carried out with dust control measures adequate to prevent creation of a nuisance to persons or public or private property. Project design measures must be incorporated into all earth-disturbing activities to minimize the amount of particulate matter emissions from construction.

Alpine CPU Policies

Specific Alpine CPU goals and policies in the Land Use, Mobility, and Conservation and Open Space Elements are relevant to impacts and resources related to air quality are summarized below.

Land Use Element

Goal LU-6 states that the built environment should be in balance with the natural environment, scarce resources, natural hazards, and the unique local character. Policies LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, and LU-6.7 support this goal by describing how development should be designed, sited, and implemented. Policies LU-6.1 and LU-6.7 require the protection of natural resources and creation of open space. Policies LU-6.2, LU-6.3, LU-6.4, and LU-6.6 require that projects and subdivisions be designed to consolidate the

project footprint and use sustainable development practices (including incorporation of natural features) as well as maintain low density land uses in areas with sensitive natural resources.

Goal LU-7 recommends analyzing a Transfer of Development Rights (TDR) Pilot Program, and Policy LU-7.1 specifically implements a TDR Pilot Program in support of this goal. This program would promote environmental sustainability by directing density toward planned growth areas within village boundaries to reduce the generation of VMTs and GHG emissions.

Mobility Element

Goal M-1 works to support a multi-modal transportation system that serves the general convenience and safety of Alpine citizens and enhances the beauty and quality of the built environment. This goal would be supported by policies that result in improved air quality through reduced vehicle trips on roadways including Policy M-1.1 through M-1.9 which support the development of housing and services near existing and planned transit stops, encourage traffic calming and efficient circulation design improvement throughout the CPA, and promote bicycling, walking, and taking transit and efficient and safe modes of transportation.

Conservation and Open Space Element

Goal COS-1 promotes management of valuable resources, natural and man-made, and prevention of resource destruction and wasteful exploitation. Policy COS-1.1 supports this by promoting conservation education in community schools.

Goal COS-2 encourages planting of trees to absorb CO_2 and provide air quality benefits through runoff retention. Policy COS-2.1 recommends exploring incentives and tax breaks to meet this goal and consideration of support for removal of non-native vegetation.

2.3.4 Analysis of Project Effects and Determination as to Significance

Based on SDAPCD's Air Quality Impact Analysis (AQIA) Trigger Levels, as well as EPA rulemaking and California Environmental Quality Act (CEQA) thresholds adopted by the South Coast Air Quality Management District (SCAQMD), the County has established Screening Level Thresholds (SLTs) to assist in determining the significance of project-level regional air quality impacts (as shown in Table 2.3-7 and below). In June 2002, CARB adopted new, stricter standards for particulate matter that would affect both the coarse as well as fine particulate fraction; however, CARB delayed action on these proposed standards at the time in light of the findings related to statistical issues in several key short-term exposure health effects studies. Thus, SDAPCD adopted $PM_{2.5}$ standards consistent with the EPA's *Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards* (EPA 2005), which quantified significant $PM_{2.5}$ emissions. SDAPCD Rules 20.2 and 20.3 do not include VOC AQIA Trigger Levels. The County recommends a VOC SLT based on the threshold of significance for VOCs from the SCAQMD for projects for in the Coachella Valley.

Appendix G to the State CEQA Guidelines specifies that significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations related to air quality impacts. Based on guidance provided in Appendix G of the State CEQA Guidelines and the County of San Diego *Guidelines for Determining Significance for Air Quality*, the Alpine CPU would result in a significant impact if it would:

1. Conflict with or obstruct implementation of the RAQS and/or applicable portions of the SIP.

2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard in exceedance of the following SLTs:

    a. 100 pounds per day or 15 tons per year of PM_{10}

    b. 55 pounds per day or 10 tons per year of $PM_{2.5}$

    c. 250 pounds per day or 40 tons per year of NO_X

    d. 250 pounds per day or 40 tons per year of oxides of sulfur (SO_X)

    e. 550 pounds per day or 100 tons per year of CO

    f. 3.2 pounds per day or 0.6 tons per year of lead and lead compounds

    g. 75 pounds per day or 13.7 tons per year of VOCs

3. Expose sensitive receptors to substantial pollutant concentrations, such that:

    a. The project places sensitive receptors near CO "hotspots" or creates CO "hotspots" near sensitive receptors.

    b. Project implementation will result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without the application of Toxic Best Available Control Technology (T-BACT) or a health hazard index greater than one.

4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, such that:

    a. The project places a new odor-producing land use activity adjacent to sensitive receptors or places sensitive receptors adjacent to or near an odor-producing land use (including wastewater treatment facilities, animal facilities, organic agricultural operations, or agricultural operations that apply odor producing chemicals)

The County's SLTs, as informed by SDAPCD's Trigger Levels in Rules 20.2 and 20.3 are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS. The federal and State ambient air quality standards, in turn, are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health. Using federal and State guidance pertaining to TACs, SDAPCD developed cancer risk thresholds for TAC exposure. Unlike criteria air pollutants, there are no known safe concentrations of TACs. Moreover, TAC emissions contribute to the deterioration of localized air quality because of the dispersion characteristics of TACs, emissions that do not typically cause regional-scale air quality impacts. SDAPCD thresholds are designed to ensure that a source of TACs does not contribute to a localized, significant impact to existing or new receptors. These risk-based TAC thresholds have been incorporated into the County's *Guidelines for Determining Significance for Air Quality* analyses under CEQA.

2.3.4.1 Analysis Methodology

Regional and local criteria air pollutant emissions and associated impacts, as well as impacts from TACs, CO, and odors were assessed in accordance with State CEQA Guidelines and the County of San Diego *Guidelines for Determining Significance for Air Quality*. The impacts associated with construction and operation of the Alpine CPU buildout were based on anticipated land use development for the buildout

year of 2050 relative to buildout under existing 2011 General Plan land use designations. As discussed previously, the proposed project would allow for the development of 6,078 residential units and approximately 393.46 acres of commercial land uses in the Alpine CPA. Buildout of the proposed project would allow for 2,013 additional residential units and 32.76 acres of commercial space over what is currently allowed within the Alpine CPA under the General Plan. The project does not propose any changes to allowable industrial uses in the Alpine CPA. The severity of potential impacts related to the emissions of criteria air pollutants and ozone precursors caused by the increase in development potential above allowable General Plan buildout was assessed based on the proposed project's total increase in development above existing conditions (set to a base year of "on-the-ground" development in 2012, consistent with San Diego Association of Governments [SANDAG] modeling)[1].

Emissions from construction activities and operational emissions associated with area and energy sources were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 computer program (California Air Pollution Control Officers Association [CAPCOA 2016]). This modeling tool provides estimated emissions of criteria air pollutants and GHG emissions using user-defined inputs and default data when local or project-specific data are not available. The primary inputs for emissions estimates are land uses associated with a project. As described previously in Chapter 1, Project Description, land use data for the proposed project are available at the community plan level (i.e., allowable buildout of dwelling units for residential land uses and acreage for commercial uses). The total single-family and multi-family dwelling units were used to estimate emissions associated with residential uses. To provide the most representative estimates for commercial uses, the total building square footage is needed to input into CalEEMod. Thus, for the purposes of this air quality modeling (as well as the modeling of GHG emissions provided in Chapter 2.6, Greenhouse Gases, and energy consumption provided in Chapter 3.0, Other CEQA Considerations), the acreage for these uses was converted to square feet. The anticipated square footage of buildout of commercial uses through the implementation of the proposed project and allowable General Plan buildout were estimated based on the total acreage of commercial, and mixed-use land uses, multiplied by the existing floor area ratio (FAR) of similar uses in the Alpine CPA. The existing FAR was estimated based on a reasonable rate of commercial buildout on existing sites in the Alpine CPA. An additional adjustment was made for estimated development on parcels zoned "Village Core Mixed Use (C-5)" to account for the potential mix of uses on these sites (i.e., estimated retail land use was reduced to account for additional residential uses developed on the site). This mixed-use adjustment assumed that 70 percent of the square footage on mixed-use sites would be occupied by commercial uses. This conversion was prepared by Chen Ryan and Associates (Chen Ryan 2020a), and a detailed description of this methodology is provided in Appendix G. For consistency with other Alpine CPU SEIR sections, commercial land uses within this section are described based on acreage.

Construction

Emissions from construction activities represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of development. Air quality impacts can be acute during construction periods, resulting in significant localized impacts to air quality. Construction-related emissions are difficult to quantify with a high degree of accuracy at the community plan level because

[1] To determine VMT for inventories and projections, SANDAG provides jurisdiction-specific VMT data for a base year and requested horizon year(s) depending on the jurisdiction's planning milestone years. The base year VMT data for the unincorporated County that most closely represents actual conditions is the 2012 base year, consistent with Series 13 base year. This base year is used as the overall baseline for this analysis as it represents the most available dataset reflective of all existing land uses and emissions sources and is most closely calibrated in SANDAG's model.

such emissions are dependent on the characteristics and circumstances of future individual development projects that are not known at this time.

The Alpine CPU would accommodate future development of residential, commercial, and industrial land uses. The future development and other physical changes that could occur as a result of Alpine CPU implementation would generate construction-related emissions of criteria air pollutants and precursors, including VOC, NO_X, PM_{10}, and $PM_{2.5}$ from site preparation (e.g., excavation, clearing), off-road equipment, material delivery, worker commute trips, and other activities (e.g., building construction, asphalt paving, application of architectural coatings). Such activities would include use of construction equipment such as forklifts, cranes, pick-up and fuel trucks, compressors, loaders, backhoes, excavators, dozers, scrapers, pavement compactors, welders, concrete pumps, concrete trucks, and off-road haul trucks, as well as other diesel-powered equipment as necessary. Fugitive dust emissions of PM_{10} and $PM_{2.5}$ would be associated primarily with site preparation/grading and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance, and mobile sources. Emissions of ozone precursors would be emitted from the exhaust of construction equipment and on-road vehicles. Paving and the application of architectural coatings also would result in off-gas emissions of VOCs. PM_{10} and $PM_{2.5}$ would be emitted from off-road equipment and vehicle exhaust.

As discussed previously, specific construction phasing and intensity are unknown. The levels of emissions generated through these activities would depend on the characteristics of individual future development projects under the Alpine CPU, including the size and type of land uses being developed, which would determine the length and intensity of construction activity. However, in an effort to provide a conservative estimate of potential construction-related emissions for the Alpine CPU, emissions associated with typical construction projects (i.e., single- or multi-family residential, commercial, general industrial) were quantified. Emissions were estimated based on an assumed two-year construction schedule and a hypothetical combination of land uses that could be constructed under the Alpine CPU.

Construction emissions of criteria air pollutants and precursors were estimated using the CalEEMod Version 2016.3.2 computer program (CAPCOA 2016). This analysis presents potential scenarios under which construction could occur, while acknowledging construction projects may vary in intensity and size. Thus, this analysis may provide bounds for construction emissions that could be used to evaluate future projects under the Alpine CPU, where applicable.

Operations

The quantitative analysis for operational emissions of criteria air pollutants and precursors was conducted by comparing the estimated emissions generated by the Alpine CPU to the 2011 General Plan buildout. Emission estimates include long-term operational emissions of ozone precursors (i.e. VOC and NO_X) and criteria air pollutants associated with mobile sources (i.e. vehicle trips), area sources (e.g., landscape equipment, consumer products, and ongoing maintenance activities), and energy consumption.

Emissions from area and energy sources were estimated using land use data provided by the County and identified in Chapter 1, Project Description. CalEEMod default values for landscaping equipment, hearths (including wood-burning fireplaces in residential homes), and consumer products were used where project-specific information was not available, based on the Alpine CPA's location and proposed land use types. Adjustments were made to CalEEMod default values to account for the following regulatory change that has become effective but is not accounted for in CalEEMod Version 2016.2.3:

- Default building energy consumption rates were adjusted to account for energy efficiency improvements from the 2019 California Energy Code (California Code of Regulations Title 24, Part

6), assuming a 53-percent reduction in residential energy consumption and a 30-percent reduction in non-residential energy consumption compared to the 2016 Title 24 regulations built into CalEEMod (California Energy Commission [CEC] 2018).

Emissions of criteria air pollutants and precursors from mobile sources were estimated using VMT estimates provided through the SANDAG Series 13 Activity Based Model forecasts. These forecasts provided by SANDAG include estimated VMT in 2050 for the 2011 General Plan buildout and project buildout. These modeling forecasts are described in further detail in Chapter 2.13, Transportation and Traffic. Using estimated buildout VMT, emissions of criteria air pollutants from mobile sources were estimated using emission factors for SDAB from CARB's EMFAC2017 model. Adjustment factors provided by CARB were applied to EMFAC2017 to account for anticipated future changes in emission factors as a result of the SAFE Rule.

Toxic Air Contaminants

The level of health risk from exposure to construction- and operation-related TAC emissions was assessed qualitatively because of the programmatic nature of the project. This assessment was based on the proximity of TAC-generating construction activity to sensitive receptors within the Alpine CPA, typical types of diesel-powered construction equipment that would be used, and the potential duration of potential TAC exposure. Operation-related exposure from existing sources (e.g., stationary sources, roadways) to new sensitive receptors (e.g., new residential developments under Alpine CPU) was also evaluated qualitatively.

Odors

Impacts related to odors were assessed qualitatively, based on potential construction activities, equipment types and duration of use, overall construction schedule, and distance to nearby sensitive receptors. Potential operational odor sources were also evaluated qualitatively based on the proposed land uses in the Alpine CPU. Odor impacts were evaluated in accordance with SDAPCD guidance and methods.

Carbon Monoxide "Hotspots"

CO emissions are the result of the combustion process and primarily associated with mobile emission sources (i.e. on-road vehicles). CO "hotspots" are locations where there may be high volumes of mobile-source emissions, resulting in CO concentrations that exceed the NAAQS and/or CAAQS. CO "hotspots" have been found to occur at signalized intersections that operate at or below a level of service (LOS) E with peak-hour trips exceeding 3,000 trips. Impacts related to CO "hotspots" would occur if a project places a new sensitive receptor within 500 feet of a signalized intersection operation at or below LOS E with peak-hour trips exceeding 3,000 trips, or if a project-generated trips would cause an intersection to operate at or below LOS E and exceed 3,000 peak-hour trips.

2.3.4.2 Issue 1: Conflict with Air Quality Plans

Guidelines for the Determination of Significance Analysis

The SDAB is in nonattainment for both CAAQS and NAAQS for ozone and CAAQS for PM_{10} and $PM_{2.5}$. The SDAB has prepared attainment plans for ozone (i.e., 2008 Eight-Hour Ozone Attainment Plan for San Diego County, 2008 Eight-Hour Ozone Reasonably Available Control Technology Demonstration for San Diego County, and 2016 Revision of the RAQS for San Diego County) but has not prepared a similar plan for particulate matter. The emission inventories used to develop the applicable air quality attainment plans

are based primarily on projected population and employment growth and associated VMT for the SDAB. This growth is estimated for the region based, in part, on the planned growth identified in regional and local land use plans such as general plans or community plans. Regional growth in the unincorporated County was estimated based on identified growth in the County's General Plan and associated Community Plans for each unincorporated community in the County. Therefore, projects that would result in increases in population or employment growth beyond that projected in regional or local plans could result in increases in VMT above that forecasted in the attainment plans, further resulting in mobile source emissions that could conflict with or obstruct implementation of the RAQS and applicable portions of the SIP. Increases in VMT beyond that projected in the County's General Plan, SANDAG's regional VMT modeling, and SDAPCD regional air quality attainment plans generally would be considered to have a significant adverse incremental effect on the SDAB's ability to attain CAAQS and NAAQS for all criteria air pollutants.

Impact Analysis

The 2011 General Plan EIR determined that the proposed land use designations and accompanying future development based on those designations would not conflict with or obstruct implementation of the RAQS or SIP. The discussion of impacts related to air quality plan consistency in the prior EIR can be found in Section 2.3.3.1 of the 2011 General Plan EIR and is hereby incorporated by reference. The 2016 RAQS includes various emission reduction strategies (e.g., VOC content requirements in architectural coatings, vehicle retirement programs, and off-road vehicle maintenance requirements) that would reduce VOC and NO_X emissions from future development proposed under the Alpine CPU. Development under the Alpine CPU would be subject to the SDAPCD rules and regulations including Rule 55 *Fugitive Dust Control* and Rule 67.0.1 *Architectural Coatings*, and County Code Section 87.428 (Grading Ordinance). In addition, the Alpine CPU would support and assist with the implementation of air quality policies in the 2011 General Plan through compliance with SDAPCD rules, listed in Section 2.3.1.3, Local Regulations.

The project proposes changes to the land use development potential in four of the seven of the Alpine CPA subareas. These land use changes would generally result in increased density, intensity and the number of dwelling units (see Section 1.4.2*, Proposed Land Use Changes*) compared to the existing land use map in the current Alpine Community Plan. The project proposes 2,013 additional housing units and 32.76 acres of commercial uses beyond what was planned in the 2011 General Plan Update.

Due to the increase in residential development and commercial uses, a net increase in VMT is projected from the 2011 General Plan Update. It is estimated that the proposed project would result in an incremental increase of 236,957 daily VMT, which was not considered in the regional growth projections based on the 2011 General Plan Update.

The RAQS utilizes SANDAG population forecasts and CARB mobile source forecasts to develop emissions reduction measures necessary for attaining the NAAQS. The SANDAG model used for projecting growth in the unincorporated County, including within the Alpine CPA, considers the demographic, economic, and land use data from the existing General Plan and Alpine Community Plan. Because the project is proposing development in the Alpine CPA beyond what was included in the RAQS forecasts and SIP, the Alpine CPU would be inconsistent with the RAQS and applicable portions of the SIP. This impact is **potentially significant** because the Alpine CPU would result in growth that was not anticipated in the RAQS or SIP.

The proposed increase in population and dwelling units in the Alpine CPA would increase the total VMT. However, as described in Chapter 2.14, Transportation and Traffic, as the density within the village center increases, the distance between land uses is reduced, resulting in shorter trips. Though the project would result in an overall increase in VMT, the average VMT per capita would be less than what would be

projected for the existing 2011 General Plan land uses. The improvement in per capita VMT indicates increased efficiency and reduced distance per trip and would result in fewer emissions of criteria air pollutants generated per vehicle trip.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, State, and local regulations would apply to the Alpine CPU and associated future developments. Mobile emissions sources are regulated by the EPA and CARB, and the emissions and reduction strategies related to mobile sources are considered in the SIP. Additionally, the SIP provides strategies for attaining and maintaining the ozone and CO NAAQS. SDAPCD has developed the RAQS and ozone attainment plans that address emissions reduction measures designed to reduce emissions of ozone precursors. To support these ozone reduction goals, SDAPCD has developed specific reduction strategies for development projects. These strategies include control measures for VOCs and NO_X emissions for which compliance must be demonstrated through permitting requirements with the SDAPCD. In addition, the RAQS includes strategies to reduce emissions from other emissions sources including on-road vehicles, landscaping equipment, and back-up generators. Future development occurring under the Alpine CPU would be required to be consistent with the emissions reduction strategies in the RAQS and SIP in order to comply with SDAPCD rules and regulations and obtain required SDAPCD permits for applicable sources. Future projects subject to discretionary review would also demonstrate consistency during the environmental review process.

By reference, the Alpine CPU has incorporated air quality mitigation measures identified in the 2011 General Plan EIR, such as Air-2.1 and Air-2.4 through Air-2.9. The applicable 2011 General Plan EIR mitigation measures encourage the use of hybrid and alternatively fueled vehicles, promote clean air technologies, require projects to reduce construction-related emissions, and require compliance with existing regulations to reduce the effects on air quality. SANDAG provides regional demographics projections that are used in the development of the RAQS and air quality attainment plans. In addition to this modeling, SANDAG provides regional VMT estimates and forecast that support the development of transportation plans and air quality analyses. These forecasts rely on coordination with local jurisdictions to determine potential growth that could occur throughout the County identified in general plans and capital facilities plans. On an annual basis, the County provides SANDAG with updated land use designations in the General Plan or community plans to ensure SANDAG demographics, employment, and transportation forecasts reflect the most recently approved plans and developments. Through annual coordination with SANDAG, the County provides land use changes that would be included in forecasts used by SDAPCD to develop updates to the RAQS and air quality attainment plans.

Summary

The project would increase the permitted number of dwelling units and commercial uses in the Alpine CPA, resulting in an increase in annual VMT above what was anticipated through the 2011 General Plan. This increase in population, employment, and VMT was not included in regional growth forecasts used in preparation of the RAQS and SIP. Because the project would result in growth beyond what was assumed in the RAQS, the project may conflict with the region's attainment plans. Thus, the project's impact would be **potentially significant** and specific implementation programs are identified as mitigation (Impact AQ-1).

2.3.4.3 Issue 2: Result in a Cumulatively Considerable Increase in Nonattainment Pollutant.

Guidelines for the Determination of Significance Analysis

Emissions in excess of the County's SLTs, shown in Table 2.3-7, would be expected to have a significant impact on regional air quality because an exceedance of the SLTs is anticipated to contribute to CAAQS and NAAQS violations in the County.

Table 2.3-7. County of San Diego Screening Level Thresholds

	Total Emissions		
Pollutant	**lb/hr**	**lb/day**	**ton/year**
Respirable Particulate Matter	—	100	15
Fine Particulate Matter[1]	—	55	10
Nitrogen Oxides	25	250	40
Sulfur Oxides	25	250	40
Carbon Monoxide	100	550	100
Lead and Lead Compounds	—	3.2	0.6
Volatile Organic Compounds[2]	—	75	13.7

Source: County of San Diego, 2007
Notes: lb/day = pounds per day; lb/hr = pounds per hour
[1] Based on EPA's "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, and also South Coast Air Quality Management District's Air Quality Significance Thresholds (South Coast Air Quality Management District 2015).
[2] Threshold for volatile organic compounds (VOCs) based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.
[3] 13.7 Tons Per Year threshold based on 75 lb/day multiplied by 365 days/year and divided by 2000 lb/ton.

For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The hourly and yearly SLTs are most appropriately used in situations when temporary emissions like emergency generators or other stationary sources are proposed as part of a project. The daily SLTs are most appropriately used for the standard construction and operational emissions (County of San Diego 2007).

Supportive of the NAAQS and CAAQS, the County's SLTs are scientifically substantiated, numerical mass emissions levels of criteria air pollutants considered to be protective of human health. A project with emissions rates below these thresholds is considered to have a less than significant impact on regional and local air quality and would have a low potential for resulting in impacts to human health due to the nexus between SLTs, ambient air quality standards, and public health.

Impact Analysis

The 2011 General Plan EIR determined that the proposed land use designations and accompanying future development based on those designations would result in significant and unavoidable impacts related to violations of an air quality standard and cumulatively considerable contributions to a net increase in pollutants for which the SDAB is in nonattainment. The discussion of impacts related to air quality

violations and cumulatively considerable pollutant emissions in the prior EIR can be found in Sections 2.3.3.2 and 2.3.3.3 of the 2011 General Plan EIR and is hereby incorporated by reference.

2011 General Plan Policy COS-14.10, described in Section 2.3.2.3, may help reduce construction-generated criteria pollutant emissions by requiring construction contractors (and encourages other developers) to use low-emission construction vehicles and equipment. SDAPCD Rule 55 and SDAPCD's Rule 67.0.1 would also reduce construction-generated emissions. The 2011 General Plan EIR also includes several air quality mitigation measures that would be applicable to the proposed project, including Air-2.5, Air-2.6, Air-2.7, Air-2.9, which are provided in Section 2.3.6.

Construction

Future development and other physical changes that could occur as a result of Alpine CPU implementation would generate construction-related emissions of criteria air pollutants and precursors, including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$, from site preparation (e.g., excavation, clearing), off-road equipment, material delivery, worker commute trips, and other activities (e.g., building construction, asphalt paving, application of architectural coatings). Some of this construction activity was previously accounted for and analyzed in the 2011 General Plan EIR and could occur without the implementation of the proposed project. However, as the proposed project would allow for additional development of land uses greater than what is allowed under the General Plan, an increase in construction activity could occur.

As discussed previously, specific construction phasing and intensity are unknown. For this analysis, a worse case construction scenario was developed to assess a potential, worst-case scenario under the Alpine CPU related to construction impacts. Under a worst-case scenario, modeled emissions assume that one quarter of the allowable development in the Alpine CPU would be constructed over a two-year period. This scenario is modeled to represent the highest potential construction intensity that could occur to model emissions on the worst day. Construction schedules were adjusted to reflect a condensed, two-year development timeline and estimated using CalEEMod default construction equipment. The emissions associated from construction of this potential development scenario are presented in Table 2.3-8.

Table 2.3-8. Maximum Daily Construction Emissions Associated with 25 Percent of the Alpine CPU Buildout (pounds per day)

Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
25 percent of Proposed Project						
2021	25	246	180	<1	74	40
2022	348	79	94	<1	17	6
Maximum Daily	348	246	180	<1	74	40
Exceed Significant Threshold?	Yes	No	No	No	No	No
Significance Threshold	75	250	550	250	100	55

Source: Appendix D

Notes: Totals may not add exactly due to rounding.

VOC = volatile organic compound NO = oxides of nitrogen CO = carbon monoxide SOx = oxides of sulfur

PM_{10} = respirable particulate matter $PM_{2.5}$ = fine particulate matter

As shown in Table 2.3-8, construction activities associated with the potential development of one quarter of the allowable Alpine CPU uses could result in emissions of VOCs in excess of County SLTs. Additionally, though NO_X emissions shown in Table 2.3-4 were estimated not to exceed the County's SLTs, they are relatively close to this threshold. Thus, it is possible that NO_X emissions could exceed County SLTs if

project conditions change such that additional equipment use or trips would occur in a single day, or multiple construction activities occur simultaneously in the CPA, increasing the maximum daily emissions. For this reason, construction emissions associated with the proposed project could also result in emissions of NO_X in excess of County SLTs. While the construction modelling was conducted to reflect a hypothetical scenario in which a substantial amount of development occurred in a short timeframe, the modeling identifies that significant amount of simultaneous construction activity could result in exceedances of County SLTs. Under this hypothetical development scenario, it was assumed that project-specific construction activities could occur simultaneously (i.e., grading activities from one project occurring simultaneous to building construction of another). These scenarios could result in the generation of emissions from construction equipment, application of architectural coating, or ground disturbance that, when combined with other projects, would potentially exceed thresholds.

The addition of VOCs and NO_X, which are precursors to ozone, could result in an increase in ambient concentrations of ozone in the County and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. As summarized in Section 2.3.1, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. Also, depending on future projects' construction schedules and earth-moving activities, increases in construction generated emissions of particulate matter could impede SDAPCD's efforts to bring the region into attainment of the CAAQS for PM_{10} and $PM_{2.5}$.

However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with implementation of the proposed project to specific health outcomes for sensitive receptors. While the description of effects noted above could manifest in the recipient receptors, actual effects on individuals depend on individual factors, such as life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even armed with this type of specific medical information (which is confidential to the individual), there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the types of health effects that could occur, it would be speculative to more specifically correlate exposure to criteria air pollutant and precursors from this project to specific health outcomes for sensitive receptors. When evaluating emissions of air pollutants against the County's SLTs, with the understanding that such thresholds are intended to apply to individual projects, it is conservatively possible that health complications associated with criteria air pollutant exposure could be exacerbated by construction-generated emissions.

Further, all proposed projects under the Alpine CPU that may require discretionary review would need to comply with General Plan policies and 2011 General Plan EIR mitigation measures, relevant County ordinances, and SDAPCD rules.

Nonetheless, because of the nonattainment status of the County for ozone, PM_{10}, and $PM_{2.5}$, construction activities associated with proposed project implementation may result in adverse air quality impacts to existing surrounding land uses and may contribute to the existing adverse air quality condition in the County. Further, as actual construction phasing is not known, it is possible that emissions may exceed or be below modeled emissions shown in Table 2.3-8. Based on conservative modeling described above, it is possible that development under the proposed project could exceed County SLTs at some point during the construction phases. Therefore, construction emissions could contribute to the existing nonattainment condition in the County with respect to the CAAQS and NAAQS for ozone and particulate matter and could therefore increase the potential for adverse health impacts from exposure to these pollutants.

This impact is **potentially significant** because potential emissions generated during construction activities as a result of the Alpine CPU would exceed SLTs.

Operation

Future development and other physical changes that could occur as a result of Alpine CPU implementation would result in long-term operational emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Operational emissions would be generated from area sources (e.g., landscaping-related fuel combustion sources, the periodic application of architectural coatings, and the use of consumer products), energy use (e.g., electricity and natural gas), and from additional vehicle trips associated with all new land use development. To estimate the change in emissions between the Alpine CPU and conditions assumed in the 2011 General Plan EIR, emissions were quantified using CalEEMod.

Existing operational emissions of criteria air pollutants and ozone precursors were estimated for existing, "on-the-ground" activities. The existing land uses were based on a 2012 baseline year, which is reflective of the best available land use data for the Alpine CPA and consistent with the base year VMT modeling from SANDAG's Series 13 estimates. This base year is considered best available because it is calibrated by SANDAG based on actual conditions reflected by existing land uses, travel surveys, and state of the transportation network. A summary of the existing operational emissions for the Alpine CPA are shown in Table 2.3-9.

Table 2.3-9. Modeled Maximum Daily Emissions of Criteria Air Pollutants and Precursors Emissions (lb/day) Associated with the Existing Conditions for the Alpine CPA

	lb/day					
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Conditions (2012)						
Natural Gas Usage	5	45	21	<1	4	4
Architectural Coating	37	<1	<1	<1	<1	<1
Consumer Products	235	<1	<1	<1	<1	<1
Hearth [1]	10,046	196	12,400	22	1,739	1,739
Landscaping	17	6	543	<1	3	3
Mobile	362	673	2,911	8	114	51
Total	10,701	920	15,876	31	1,859	1,797

Source: Appendix D

Notes: Totals may not add exactly due to rounding.

lb/day = pounds per day VOC = volatile organic compound NO = oxides of nitrogen CO = carbon monoxide

SOx = oxides of sulfur PM_{10} = respirable particulate matter $PM_{2.5}$ = fine particulate matter

[1] The actual number of existing hearths (i.e. wood burning fireplaces or stoves) is unknown in the Alpine CPA. Emissions from hearth usage is based on CalEEMod default values which assume 35 percent of single- and multi-family residential units in San Diego County have wood burning hearths.

As described in Chapter 1.0, Project Description, the Alpine CPU would allow for the development of additional residential and commercial uses in the Alpine CPA. Though the actual frequency of residential units and commercial uses that would be built by 2050 (the planning horizon year for the Alpine CPU) and the intervening years is ultimately unknown, the maximum possible buildout based on the allowed land uses is used in this operational analysis. This maximum buildout was estimated using the existing

FAR based on a reasonable rate of commercial buildout on existing sites in the Alpine CPA, described previously in Section 2.3.3.1, Analysis Methodology. The Alpine CPU would allow for the development of approximately 6,078 residential units and 393.46 acres of commercial space. Over the buildout of the Alpine CPU, this would allow for 2,013 additional residential units and 32.76 additional acres of commercial space than what is currently allowed under the General Plan.

For the purposes of this analysis, the potential impacts from operations of the Alpine CPU are determined based on the potential increase in emissions of criteria air pollutants beyond what is currently allowed in the 2011 General Plan. Table 2.3-10 summarizes the maximum daily operational emissions of criteria air pollutants and precursors that would be generated by buildout of the allowed uses under the 2011 General Plan and the Alpine CPU, and a comparison of the net change in emissions to the County's SLTs.

Table 2.3-10. Modeled Maximum Daily Emissions of Criteria Air Pollutants and Precursors Emissions (lb/day) Associated with the 2011 General Plan and Alpine CPU Buildout

	lb/day					
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2011 General Plan						
Natural Gas Usage	8	72	40	<1	6	6
Architectural Coating	66	<1	<1	<1	<1	<1
Consumer Products	439	<1	<1	<1	<1	<1
Hearth	16,267	318	20,079	36	2,815	2,815
Landscaping	27	10	878	<1	5	5
Mobile	222	505	2,562	8	169	70
Total	17,028	905	23,559	45	2,995	2,896
Alpine CPU						
Natural Gas Usage	9	76	42	<1	6	6
Architectural Coating	74	<1	<1	<1	<1	<1
Consumer Products	488	<1	<1	<1	<1	<1
Hearth	19,347	378	23,882	43	3,348	3,348
Landscaping	32	12	1,043	<1	6	6
Mobile	257	586	2,970	10	196	81
Total	20,207	1,052	27,937	53	3,556	3,441
Net Change from 2011 General Plan	3,179	147	4,378	8	561	546
Net Change from Existing Conditions (2012)	9,506	132	12,061	23	1,697	1,645
Exceed Significant Threshold?	Yes	No	Yes	No	Yes	Yes

lb/day						
Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Significance Threshold	75	250	550	250	100	55

Source: Appendix D

lb/day = pounds per day VOC = volatile organic compound NO = oxides of nitrogen CO = carbon monoxide

SOx = oxides of sulfur PM_{10} = respirable particulate matter $PM_{2.5}$ = fine particulate matter

Notes: Totals may not add exactly due to rounding. Determination of threshold exceedance and significance are based on the net increase of emissions between existing conditions in 2012 and the proposed project. Emissions from industrial sources were modeled in separate CalEEMod files to reflect no increase in industrial uses beyond existing conditions. Details are shown in Appendix D.

As shown in Table 2.3-10, the proposed project would result in emissions of criteria air pollutants and ozone precursors greater than what would have been anticipated under the 2011 General Plan. As compared to existing conditions, operational activities would result in net emissions of VOC, CO, SO_X, PM_{10}, and $PM_{2.5}$ that exceed the County SLTs. The addition of VOCs, which is a precursor to ozone, could result in an increase in ambient concentrations of ozone in the SDAB and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. The generation of VOCs are largely attributable to the assumed installation of wood burning fireplaces and stoves, assumed using CalEEMod default values. As summarized in Section 2.3.1.2, Air Quality Setting, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment.

Also, depending on future projects' construction schedules and earth-moving activities, increases in construction generated emissions of particulate matter could impede SDAPCD's efforts to bring the region into attainment of the CAAQS for PM_{10} and $PM_{2.5}$. However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with implementation of the proposed project to specific health outcomes for sensitive receptors. While the description of effects noted above could manifest in the recipient receptors, actual effects on individuals depend on individual factors, such as life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms.

Although this type of specific medical information is available (but confidential to the individual), there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the types of health effects that could occur, it would be speculative to more specifically correlate exposure to criteria air pollutant and precursors from this project to specific health outcomes for sensitive receptors. When evaluating emissions of air pollutants against the County's SLTs, with the understanding that such thresholds are intended to apply to individual projects, it is conservatively possible that health complications associated with criteria air pollutant exposure could be exacerbated by construction-generated emissions.

Further, all proposed projects under the Alpine CPU that require discretionary review would need to comply with General Plan policies and 2011 General Plan EIR mitigation measures, relevant County ordinances, and SDAPCD rules.

Nonetheless, because of the nonattainment status of the County for ozone, PM_{10}, and $PM_{2.5}$, construction activities associated with proposed project implementation may result in adverse air quality impacts to existing surrounding land uses and may contribute to the existing adverse air quality condition in the County. Further, as actual construction phasing is not known, it is possible that emissions may exceed or be below modeled emissions shown in Table 2.3-8. Nonetheless, based on conservative modeling

described above, it is possible that development under the proposed project could exceed County SLTs at some point during the construction phases. Therefore, construction emissions could contribute to the existing nonattainment condition in the County with respect to the CAAQS and NAAQS for ozone and particulate matter and could therefore increase the potential for adverse health impacts from exposure to these pollutants.

This impact is **potentially significant** because emissions generated from operations would result in emissions in exceedance of the SLTs.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, State, and local agencies, including the County, have identified measures to be implemented to reduce emissions from criteria air pollutants. These measures include CARB motor vehicle standards, SDAPCD reduced-VOC architectural coating rules, and CEC Title 24 Energy Efficiency Standards requirements. Further, all discretionary projects processed by the County are evaluated based on the County's *Guidelines for Determining Significance for Air Quality* which uses the SLTs for criteria air pollutants to determine potential impacts. Individual projects subject to discretionary review would be required to implement all feasible mitigation measures if they are found to generate construction or operational emissions of criteria air pollutants in excess of the SLTs.

The SDAB is currently classified as nonattainment for federal and State ozone standards and State PM_{10} and $PM_{2.5}$ standards. As described in Section 2.3.1.2, Issue 1: Conflict with Air Quality Plans, the SDAPCD has published attainment plans for ozone that are based on demographic, employment, and transportation projections provided by SANDAG. Through the County's annual coordination with SANDAG to provide updated land use development potential allowed in the County's General Plan and associated community plans, future updates to the RAQS and attainment plans would include regulatory measures that support attainment of federal and State ozone standards with the implementation of the Alpine CPU.

Summary

The project would result in emissions of criteria air pollutants from construction- and operations-related activities. Because the timing and intensity of construction activities is dependent on market conditions and unknown at this time, emissions from construction activities from future developments may result in exceedances of the County SLTs. Operational emissions from the buildout of the allowable Alpine CPU land uses were found to exceed the County SLTs for VOC, CO, PM_{10} and $PM_{2.5}$. Therefore, impacts related to emissions of criteria air pollutants would be **potentially significant** and specific implementation programs are identified as mitigation (Impact AQ-2).

2.3.4.4 Issue 3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Guidelines for the Determination of Significance Analysis

Using federal and State guidance pertaining to TACs, SDAPCD developed cancer risk thresholds for TAC exposure. Unlike criteria air pollutants, there is no known safe concentrations of TACs. Under SDAPCD's Rule 1200 Projects that would result in exposure to TACs resulting in a maximum incremental cancer risk (MICR) greater than 1 in 1 million without application of T-BACT, MICR greater than 10 in 1 million with application of Toxics T-BACT, or a chronic and acute non-cancer health hazard index greater than 1 would be deemed as having a potentially significant impact related to health risks from diesel PM exposure.

CO emissions are the result of the combustion process and primarily associated with mobile emission sources (i.e. on-road vehicles). CO "hotspots" are locations where there may be high volumes of mobile-source emissions, resulting in CO concentrations that exceed the NAAQS and/or CAAQS. CO "hotspots" have been found to occur at signalized intersections that operate at or below a LOS E with peak-hour trips exceeding 3,000 trips. Impacts related to CO "hotspots" would occur if a project places a new sensitive receptor within 500 feet of a signalized intersection operation at or below LOS E with peak-hour trips exceeding 3,000 trips, or if a project-generated trips would cause an intersection to operate at or below LOS E and exceed 3,000 peak-hour trips.

Impact Analysis

The 2011 General Plan EIR determined that the proposed land use designations and accompanying future development based on those designations would result in significant and unavoidable impacts related to the exposure of sensitive receptors to substantial amounts of TACs or HAPs. The discussion of impacts related to exposure of sensitive receptors in the prior EIR can be found in Section 2.3.3.4 of the 2011 General Plan EIR and is hereby incorporated by reference.

The focus of the analysis of TACs for the Alpine CPU is diesel PM. Although other TACs exist (e.g., benzene, 1,3-butadiene, hexavalent, chromium, formaldehyde, methylene chloride), they are primarily associated with industrial operations. The potential cancer risk from the inhalation of diesel PM outweighs the potential for all other health impacts (i.e., noncancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2003). With regards to exposure of diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. According to Office of Environmental Health Hazard Assessment's (OEHHA's *Air Toxics Hot Spots Program Risk Assessment Guidelines*, exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period for estimating cancer risk at the Maximum Exposed Individual (MEI), with 9- and 70-year exposure periods at the MEI as supplemental information. Furthermore, a 70-year exposure period is recommended for estimating cancer burden or providing an estimate of population-wide risk (OEHHA 2015).

Construction

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, clearing, grading); paving; on-road truck travel; and other miscellaneous activities. On-road diesel-powered haul trucks traveling to and from the construction areas to deliver materials and equipment are less of a concern because they would not stay on the site for long periods of time.

Risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. However, it is likely that construction activities would be located at various locations throughout the Alpine CPA, and due to the dispersive properties of diesel PM, concentrations from individual construction sites would be lower. In addition, construction activities would occur over a thirty-year time frame and would not occur all at once. As such, no single existing or future receptor is anticipated to be exposed to substantial construction-related emissions of diesel PM for extended periods of time.

Table 2.3-5 above shows the sensitive receptors within the CPA. Without specific details on the locations of future building footprints or their construction schedules, a quantitative evaluation of potential health risk impacts is not feasible. However, as noted above, construction activities occurring in the Alpine CPA

would be temporary and would not expose a single receptor to substantial exposure of construction-related emissions of diesel PM. Additionally, all construction projects would be required to comply with SDAPCD rules and County ordinances regulating construction activities. Further, mitigation identified under Impact-AQ-2 would serve to substantially reduce diesel PM emission from construction activities. For this reason, this impact would be less than significant for construction activities.

Operations

Proximity to highways increases cancer risk and exposure to diesel PM. Similarly, proximity to heavily traveled corridors and intersections would expose future residents of Alpine CPU to higher levels of diesel PM. CARB recommends avoiding siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day (CARB 2005). Portions of Alpine CPU subareas three, four, five, and six are located within 500 feet of I-8 and include land use designations that would allow for the future development of residences. While it is outside of the scope of this analysis to identify the impacts of these existing environmental conditions on future development, development allowed under the Alpine CPU may exacerbate any existing environmental impacts to sensitive receptors located in these areas.

According to Chapter 2.14, *Transportation and Traffic*, the proposed project would result in average daily traffic volume capacity ranges from 8,000 (at Viejas View Place) to 23,400 (at New Road 11). There are no urban roads with 100,000 vehicles or rural roads with 50,000 vehicles per day within the Alpine CPA (Chen Ryan 2020b). As implementation of the Alpine CPU would ultimately result in the new development of residential units, and non-residential space at buildout in 2050, the increase in traffic from the Alpine CPU would generate additional vehicle-related TACs (including diesel PM). As I-8 is currently classified as a freeway with high volumes in a rural setting (per CARB's Land Use Handbook) and experiences a high proportion of truck traffic, the future traffic levels from the Alpine CPU could exacerbate existing cumulative health risks.

Implementation of the Alpine CPU would result in new land uses that could generate new sources of TACs from non-residential land uses. Due to the programmatic level of this analysis, the size, land uses, and location of future development are not available. While it is unknown what specific sources would be installed or where they would operate, all new stationary sources would be subject to the permit authority of the SDAPCD. The SDAPCD will not issue a permit for a new permitted source that results in MICR in excess of 10 in one million with application of T-BACT or a hazard index greater than one.

While health risk from non-residential sources would likely be reduced through SDAPCD permitting requirements, health risks in the Alpine CPU are mainly attributable to operational exposure to on-road vehicles. CARB programs designed to reduce emissions, as well as phase-out of older vehicles, would reduce emissions from these pollutants over time, but not to a less than significant level. Furthermore, growth anticipated through implementation of the Alpine CPU would result in additional on-road vehicles within the County. This impact would be **potentially significant** because the project would result in an increased number of vehicle and truck trips occurring on roadways that could exacerbate exposure of sensitive receptors to TACs.

Federal, State, and Local Regulations and Existing Regulatory Processes

Various federal and State regulations are implemented at the local level by SDAPCD and the County. SDAPCD Rule 1210 implements the California Air Toxics "Hotspots" Information and Assessment Act (AB 2588), requiring facilities that exceed recommended OEHHA levels to reduce risk to acceptable levels.

Additionally, CARB implements programs to identify and reduce emissions from sources of diesel PM. These programs include control strategies for off-road, on-road, and marine vessel diesel sources that are regulated by the EPA. SDAPCD also requires all project that propose demolition or similar activities comply with requirements for identify, reporting, and safely disposing of asbestos-containing materials. Further, under Rule 1206, all construction projects that include any demolition or similar activity are required to comply with SDAPCD asbestos testing, reporting, and safe disposal requirements. Compliance with these requirements would reduce potential impacts to sensitive receptors related to asbestos fibers exposure. Discretionary projects in the County are also evaluated for health risks pursuant to the County's *Guidelines for Determining Significance for Air Quality* which requires projects to prepare a health risk assessment depending on the uses proposed and proximity to emissions sources or sensitive receptors.

Summary

Implementation of the Alpine CPU could result in exposure of sensitive receptors to construction-related TACs. However, given that future development under the Alpine CPU would occur incrementally between 2020 and 2050 and in various areas throughout the Alpine CPA, it is unlikely that any one sensitive receptor would be exposed to construction-related TACs for extended periods of time. Therefore, construction activity as a result of the Alpine CPU would not result in the exposure of existing or new sensitive receptors to a substantial increase in TAC emissions. The Alpine CPU would also result in an increase in total VMT along local roadways within the County as a result of future growth and development. This increase in vehicle and truck traffic could result in increased pollutant emissions on roadways that may exacerbate health risks to existing and future sensitive uses located in close proximity to roadways with high traffic volumes. All new development undergoing discretionary review would be required to evaluate existing TAC exposure and incorporate available reduction measures in accordance with the SDAPCD requirements, if necessary. However, because it is unknown the level at which future sensitive receptors could be exposed to harmful pollutant emissions exacerbated by Alpine CPU—related development, this impact would be **potentially significant,** and specific implementation programs are identified as mitigation (Impact AQ-3).

2.3.4.5 Issue 4: Result in Other Emissions (Odors) Affecting a Substantial Number of People

Guidelines for the Determination of Significance Analysis

The occurrence and severity of odor impacts depends on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generate citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose a substantial number of people to objectionable odors would be deemed to have a significant impact.

Impact Analysis

The 2011 General Plan EIR determined that the proposed land use designations and accompanying future development based on those designations would not generate significant sources of odors. The discussion of impacts related to the generation of objectionable odors in the prior EIR can be found in Section 2.3.3.5 of the 2011 General Plan EIR and is hereby incorporated by reference.

Odor sources of concern can include wastewater treatment plants, landfills and composting facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, and food processing

facilities. Six of the seven Alpine CPU land use subareas would be re-designated with land use designations supporting the uses of residential, open space, and commercial. Further, the potential land uses associated with the Alpine CPU do not include land uses that are typically associated with substantial odors (e.g., landfills, agricultural operations, wastewater treatment plants, food processing plants, chemical plants, composting, dairies, or fiberglass molding). In addition, should a new odor source be proposed within the Alpine CPA, SDAPCD Rule 51 *Nuisance* restricts the emission of air contaminants or other materials that would cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public. As a result, any odor sources cited in the Alpine CPA would be required to implement specific actions to remain in compliance with SDAPCD Rule 51.

Minor odors from the use of heavy-duty diesel-powered equipment and the laying of asphalt during construction activities would be intermittent and temporary. Due to the characteristics of diesel exhaust emissions, odors generated from the use of heavy-duty diesel-powered equipment would dissipate rapidly within 150 meters (492 feet) (Zhu et al. 2002a, 2002b). While construction would occur intermittently between 2020 and 2050, these types of odor-generating activities are not anticipated to occur at any single location or within close proximity to any individual receptors in the Alpine CPA for an extended period of time and would not result in permanent odor sources. Therefore, construction is not anticipated to result in the generation of odors that would affect a substantial number of people.

New non-residential land uses that could be developed under the Alpine CPU would not allow for the siting of any odor sources identified previously. The use of heavy-duty diesel equipment for development of land uses in the Alpine CPA are not anticipated to result in substantial odors. Any development that would occur within the Alpine CPA that could be considered an odor generator would be required to comply with relevant odor management regulations including SDAPCD Rule 51 and other odor impact minimization plan requirements. As a result, implementation of the Alpine CPU would not result in odor impacts on existing sensitive receptors or future sensitive receptors. This impact would be **less than significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

Facilities that cause nuisance odors are subject to enforcement action by the SDAPCD and County's Department of Environmental Health Local Enforcement Agency (LEA). Both SDAPCD and LEA respond to odor complaints to determine if odors generated by sites or projects violate nuisance rules. In the event an odor impact is identified by SDAPCD or LEA, appropriate means must mitigate odor-causing impacts to reduce the impacts to sensitive receptors to less than significant. Such means can include shutdown of odor sources or requirements to minimize odor generation. Discretionary projects considered by the County are evaluated for objectionable odors pursuant to the County's *Guidelines for Determining Significance for Air Quality*. Depending on the uses proposed and proximity to off-site receptors, discretionary projects may also be required to submit additional documentation (e.g., Odor Impact Minimization Plan) to comply with SDAPCD or LEA requirements and receive permits to operate.

Summary

The project would generate odors during construction activities such as the operation of construction equipment, the laying of asphalt, and application of architectural coatings. However, these odors would be temporary and would occur at various locations within the Alpine CPA. Construction odor impacts are localized and dissipate rapidly with distance from source as stated above. These potential odors would not be generated in a single location for an extended period, thus would not be anticipated to expose considerable number of persons or the public to significant odor emissions. All projects developed in the Alpine CPA will be required to comply with SDAPCD nuisance rules. SDAPCD Rule 51 (Public Nuisance)

and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section §41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health or safety of the public. Further, the proposed project would implement mitigation measures MM-AQ-2 and MM-AQ-3 which would reduce unnecessary or excessive odors emissions from construction vehicles at any one location through restricting idling and staggering construction schedules.

The project does not propose any land uses that would typically be considered odor-generating uses. Should any odor-generating uses be developed in the Alpine CPA, they would be required to comply with relevant SDAPCD and County regulations for managing and mitigating odors. Thus, the project would not result in the generation of odors that would affect a substantial amount of people and this impact would be **less than significant**.

2.3.5 Cumulative Impacts Analysis

The geographic scope of the cumulative impact analysis for air quality includes the County and surrounding vicinity. Areas considered to be within the surrounding vicinity of the Alpine CPA include: the City of El Cajon, other unincorporated County CPAs (e.g., Lakeside or Valle de Oro), U.S. Forest Service lands, and tribal lands (i.e., Viejas Reservation and Sycuan Rancheria),The cumulative scope includes the San Diego region or the airshed for reactive air pollutants and surrounding vicinity for nonreactive or less reactive pollutants.

2.3.5.1 Issue 1: Conflict with Air Quality Plans

The Alpine CPU would result in a cumulative impact by conflicting with air quality plans if the projected growth within the County combined with the Alpine CPU or other cumulative projects (i.e., projects in the unincorporated County or other jurisdictions proposing General or Community Plan Amendments, or developments on federal and tribal lands would obstruct implementation of the RAQS and SIP. Furthermore, individual projects proposed under the Alpine CPU that conflict with development beyond the regional projects could result in a cumulative impact. However, like all projects proposed in the unincorporated County and incorporated cities, individual projects proposed under the Alpine CPU would need to demonstrate that they would not conflict with the goals and strategies identified in the RAQS and SIP, and other regional air quality plans through discretionary review.

The Alpine CPU would increase land use density and intensity and result in higher growth than what was anticipated under the 2011 General Plan Update. In addition to SDAPCD rules and regulations and the 2011 General Plan EIR policies and mitigation, the County would be required to provide a revised housing and population forecasts to SANDAG to ensure that any revisions to the population and employment projections used by SDAPCD to update the RAQS and SIP will accurately reflect anticipated growth under the Alpine CPU. However, because growth projections may not be updated prior to the construction of projects proposed under the Alpine CPU, the project would result in a **potentially significant cumulative impact** (**Impact C-AQ-1**).

2.3.5.2 Issue 2: Result in a Cumulatively Considerable Increase of Nonattainment Criteria Air Pollutants

The SDAB is designated a nonattainment area for the NAAQS for ozone and for the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. Development of the proposed project along with cumulative projects in the region would have the potential to result in new, temporary sources of particulate matter and ozone precursors from construction activities. Cumulative projects would include projects in the unincorporated County that

propose General Plan amendments, large developments proposed on U.S. Forest Service or reservation lands (i.e., Viejas Reservation or Sycuan Reservation) adjacent to the Alpine CPA, and other projects in adjacent jurisdictions (e.g.., City of El Cajon). Development of large projects or multiple projects simultaneously and in close proximity to development associated with the proposed project could result in exceedances of the County SLTs for particulate matter and ozone precursors. In addition, the operation of proposed residential units would result in particulate matter and ozone emissions from off-road equipment, vehicles, and fugitive dust from surface disturbance. The SDAB is already in nonattainment for ozone, PM_{10}, and $PM_{2.5}$, therefore, implementation of the Alpine CPU would result in pollutants which would be cumulatively considerable. The project would result in a potentially significant impact associated with construction and operations related to nonattainment of criteria air pollutants. Therefore, the project would result in a **potentially significant cumulative impact** associated with the nonattainment of criteria pollutants (Impact C-AQ-2).

The cumulative contribution to ozone precursors and PM_{10} and $PM_{2.5}$, could result in an increase in ambient concentrations of ozone and particulate matter in the SDAB and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. This increase in ambient concentrations could result in increased acute and chronic health impacts; however, it would be misleading to correlate the level of cumulative criteria air pollutant and precursor emissions associated with the Alpine CPU to specific health outcomes for sensitive receptors. Therefore, other than determining the types of health effects that could occur, it would be speculative to more specifically correlate exposure to criteria air pollutants against the County SLTs, with the understanding that such thresholds are intended to apply to individual projects, it is conservatively possible that health complications associated with ozone and particulate matter could be exacerbated by cumulative operational emissions.

2.3.5.3 Issue 3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Cumulative impacts associated with sensitive receptors would occur if development within the Alpine CPA or other cumulative projects would expose sensitive receptors to cumulative concentrations of TACs. Though the Alpine CPU would increase construction activities beyond what was proposed under the 2011 General Plan, minimal exposure to diesel PM during construction activities would occur due to the dispersive nature of diesel PM and the limited time during which diesel PM is emitted at a single location. Further, this a portion of this future construction would have been anticipated in the General Plan analysis and could occur regardless of implementation of the proposed project. While the placement of new sensitive receptors near existing TAC emissions would be outside of the scope of this analysis, the buildout of the Alpine CPU could result in increased emissions of TACs that exacerbate an existing risk. The Alpine CPU would allow for the development of new residential developments within 500 feet of I-8, which could be exposed to additional sources of TACs from new vehicles and trucks (generated by new development under the Alpine CPU or by cumulative projects in the region) operating along the nearby roadway. New non-residential developments would have the potential to result in permanent increases in truck trips to the area due to operation. Cumulative projects developed in the surrounding vicinity, outside of the Alpine CPA, could also increase this risk; however, these cumulative developments are unknown. Because specific development details and health risk is unknown, and the potential for future development to exacerbate existing TAC exposure to sensitive receptors located along roadways with high traffic volumes, the project would result in a **potentially significant cumulative impact** (Impact C-AQ-3).

2.3.5.4 Issue 4: Result in Other Emissions (Odors) Affecting a Substantial Number of People

Cumulative impacts associated with odors would occur if odors within the Alpine CPA would combine with surrounding odor producing land uses or place sensitive receptors near existing odor sources. Similar to projects proposed in the unincorporated County and incorporated cities in San Diego, projects proposed under the Alpine CPU would be subject to SDAPCD's odor reduction Rule 51. Residential uses proposed under the Alpine CPU are not considered new sources of odors. However, non-residential land uses proposed would be subject to odor minimization requirements from daily operational activities, regulated by SDAPCD and LEA, where applicable. All projects in the Alpine CPA and surrounding vicinity would be required to comply with SDAPCD nuisance rules, enforcement of which is complaint based. Any individual that is experience an odor nuisance as a result of the construction or operation of the project in the Alpine CPA or surrounding vicinity could file a complaint with SDAPCD that would be investigated. Individual projects proposed under the Alpine CPU would be subject to Rule 51 and other SDAPCD and County regulations to reduce odor related impacts to sensitive receptors. Therefore, the project would result in a **less than significant cumulative impact**.

2.3.6 Significance of Impacts Prior to Mitigation

The project would result in potential significant direct and cumulative impacts to air quality. The following summarizes the potentially significant impacts that would result from implementation of the project prior to mitigation.

Impact-AQ-1: Conflict with Air Quality Plans. Due to increased development densities proposed in the Alpine CPA which are not consistent with the RAQS and SIP, the proposed project would cause a more severe potentially significant impact related to plan consistency compared to the prior EIR. This would be considered a significant impact.

Impact-AQ-2: Result in a Cumulatively Considerable Increase in Nonattainment Pollutant. Due to the increase in construction and operation emissions from increased development proposed by the Alpine CPU the project would cause a potentially significant impact related to nonattainment criteria air pollutants. Due to the increased density proposed, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.

Impact-AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations. Due to project-specific construction and operation details being unknown, the proposed project would cause a potentially significant impact related to sensitive receptors. Due to the potential for exacerbated pollutant exposure, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.

Impact-C-AQ-1: Result in a Cumulatively Considerable Conflict with Air Quality Plans. The proposed project would cause a more severe potentially significant cumulative impact related to air quality plan consistency compared to the prior EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-AQ-2: Result in a Cumulatively Considerable Increase in Nonattainment Pollutant from Cumulative Projects. Similar to the 2011 General Plan, the proposed project would cause a potentially significant cumulative impact related to nonattainment criteria air pollutants. Due

to the increased density proposed, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.

Impact-C-AQ-3: Result in a Cumulatively Considerable Exposure of Sensitive Receptors to Substantial Pollutant Concentrations. Similar to the 2011 General Plan, the proposed project would cause a potentially significant cumulative impact related to sensitive receptors. This would be considered a significant impact. Due to the potential for exacerbated pollutant exposure, the project would result in a more severe impact than the prior EIR and mitigation is therefore required.

2.3.7 Mitigation

2.3.7.1 Issue 1: Conflict with Air Quality Plans

For the reasons described above, implementation of the following 2011 General Plan EIR mitigation measures and 2011 General Plan policies presented in Section 2.3.2.3 would reduce the project's direct and cumulative impacts related to conflict with an air quality plan. Compliance with applicable air quality plans is primarily determined through consistency with forecasts used to develop the RAQS and SIP. These plans are updated in cycles and include existing land uses and land use changes known and proposed at the time of the update. Projects or plans that are developed between update cycles would not be accounted for in the exiting RAQS and SIP forecasts. However, these projects would be included in future RAQS and SIP during the update cycle following project or plan approval. These updates typically occur as directed by CARB in response to criteria air pollutant monitoring compliance and would not occur as the result of a single plan or project. Because no further feasible mitigation is available, the project's impact would not be reduced below a level of significance. Therefore, impacts would be **significant and unavoidable** (Impact-AQ-1, Impact C-AQ-1).

2011 General Plan EIR Mitigation Measures

Implementation of the 2011 General Plan EIR mitigation measures (see Appendix B, 2011 General Plan EIR Mitigation Measures) would reduce the proposed project's impacts to conflicts with air quality plans.

Alpine CPU Mitigation Measures

No feasible mitigation is available for project implementation beyond those included in the 2011 General Plan EIR. Following the adoption of Alpine CPU, the County will coordinate with SANDAG and SDAPCD to ensure future growth associated with the project is incorporated into subsequent updates of the RAQS and SIP.

2.3.7.2 Issue 2: Result in a Cumulatively Considerable Increase of Nonattainment Criteria Air Pollutants

As discretionary projects are submitted, CEQA review would be completed which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following 2011 General Plan EIR mitigation measures and mitigation measures specific to the Alpine CPU in combination with the 2011 General Plan policies presented in Section 2.3.2.3 would reduce the project's direct and cumulative impacts related to air quality violations. However, because future construction and operations of individual developments are unknown, impacts would be **significant and unavoidable** (Impact-AQ-2, Impact C-AQ-2).

2011 General Plan EIR Mitigation Measures

Implementation of the 2011 General Plan EIR mitigation measures (see Appendix B, 2011 General Plan EIR Mitigation Measures) would reduce the proposed project's impacts to conflicts with air quality plans.

Infeasible Mitigation Measures

As part of the preparation of the 2011 General Plan EIR, the County determined that the following measures were infeasible. these measures have been reviewed and again been deemed infeasible for the proposed project and will not be implemented.

- Prohibit new development that would result in emissions from new vehicle trips that would exceed the SLTs.
- Explanation: This measure would result in restrictions on future development in areas identified for increased growth in the 2011 General Plan because, with current vehicle emissions standards, it would severely limit development densities. This would conflict with the project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated County. In addition, if vehicle trips exceed SLTs but a project is not proposing densities greater than what was expected by the General Plan, those trips are accounted for in the RAQS and this does not automatically mean the actual ambient air quality standards will be exceeded.
- Encourage the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, or trolley), bicycle network, walkways, and trails.
- Explanation: This measure would result in restrictions on future development in areas identified for increased growth in the 2011 General Plan because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. In addition, the County does not have control over where new transit lines are planned. Implementation of this mitigation measure would conflict with the proposed project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.
- Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and biogas.
- Explanation: This measure would not be feasible because all applicants may not be able to provide renewable energy systems at all proposed locations due to size or building constraints. In addition, some energy systems may trigger additional regulatory requirements from the California Public Utilities Commission or CEC that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the proposed project's objective to minimize public costs of infrastructure and services.
- Install vegetated roofs that cover at least 50 percent of roof area.
- Explanation: This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof

on the project applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

- Provide a spur at nonresidential projects to use nearby rail for goods movement.
- Explanation: This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the proposed project's objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.
- Require the use of locally made building materials for construction projects.
- Explanation: This measure would not be feasible because it would severely limit development projects, as some specialized building materials for projects may not be available locally. The measure would also require the County to monitor and enforce building material purchases at construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

Alpine CPU Mitigation Measures

Construction Mitigation Measures

MM-AQ-1 Require construction contractors to use high-performance renewable diesel (HPRD) fuel for diesel-powered construction equipment. Exemptions can be made for where HPRD is not commercially available within 200 miles of the Alpine CPA, or where the use of HPRD would not be economically feasible for use in project construction. The construction contract must document their unavailability or demonstrate economic burden to receive exemption from this requirement. Any HPRD product that is considered for use by the construction contractor shall comply with California's Low Carbon Fuel Standards. HPRD fuel must meet the following criteria:

- Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., nonpetroleum sources), such as animal fats and vegetables,
- contain no fatty acids or functionalized fatty acid esters, and
- have a chemical structure that is identical to petroleum-based diesel which ensures HPRD will be compatible with all existing diesel engines; it must comply with American Society for Testing and Materials D975 requirements for diesel fuels.

MM-AQ-2 Require construction contractors to minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

MM-AQ-3 Require construction contractors to stagger the scheduling of construction activities to avoid the simultaneous operation of construction equipment to minimize criteria pollutant levels resulting from operation of several pieces of emissions-intensive equipment, to the extent feasible.

MM-AQ-4 Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on at

least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the Alpine CPA. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine.

MM-AQ-5 Require construction contractors to maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

MM-AQ-6 Require construction contractors to implement and comply with the following fugitive dust control practices.

- Reduce fugitive dust from disturbed soil areas by: watering exposed soil with adequate frequency for continued moist soil (without overwatering to the extent that sediment flows off the site); suspending excavation, grading, and/or demolition activity when wind speeds exceed 20 miles per hour; installing wind breaks (e.g., trees or solid fencing) on windward side(s) of construction areas; and planting vegetative ground cover (fast-germinating native grass seed) in disturbed areas.
- Reduce fugitive dust from unpaved roads by: installing wheel washers for all existing trucks, or washing off all trucks and equipment leaving the site; treating site access to a distance of 100 feet from the paved road with a six- to 12-inch layer of wood chips, mulch, or gravel; and posting a publicly visible sign with the telephone number and a person to contact at the lead agency regarding dust complaints.

MM-AQ-7 Require construction contractors to reduce construction-related fugitive VOC emissions by ensuring that low-VOC coatings that have a VOC content of 10 grams/liter or less are used during construction. The construction contract must demonstrate of the use of low-VOC coatings and be submitted to SDAPCD prior to the start of construction.

Operation Mitigation Measures

MM-AQ-8 Prohibit the installation of wood burning stoves or fireplaces in discretionary residential developments. All stoves and fireplaces installed in proposed discretionary residential developments must be natural gas or electric.

MM-AQ-9 Require all new residential and commercial developments to include accessible outdoor outlets in the project design to facilitate the use of electricity-powered landscaping equipment.

MM-AQ-10 Require the provision of educational materials for residential and commercial tenants concerning green consumer products and electric powered landscaping equipment. Prior to receipt of any certificate of final occupancy, the project sponsors shall work with the County to develop electronic correspondence to be distributed by email to new residential and commercial tenants that encourages the purchase of consumer products that generate lower than typical VOC emissions. Examples of green products may include low-VOC architectural coatings, cleaning supplies, and consumer products, as well as alternatively fueled landscaping equipment. The correspondence will also discuss the air quality and public health benefits of using electric powered landscaping equipment over conventional gasoline-powered equipment.

MM-AQ-11 Encourage water heaters in new residential developments to be either solar, electrically powered, or tankless gas.

MM-AQ-12 Require all non-residential projects to prepare a Transportation Demand Management (TDM) plan that focuses on reducing vehicle trips during commute hours. Project applicants shall coordinate with the County on project-specific requirements for a TDM plan related to a County TDM Ordinance, if adopted, or similar requirement. In lieu of an adopted TDM Ordinance at the County-level, projects should develop a TDM program that includes trip reduction policies supported by the SANDAG *Mobility Management Guidebook* (SANDAG 2019) or the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). Any TDM plans that developed outside of compliance with a County-adopted ordinance will be reviewed and approved by the County.

MM-AQ-13 Require all new County-owned and -operated buildings proposed within the Alpine CPA to achieve zero net energy. Additionally, all landscaping equipment used at County owned and operated buildings and managed landscaped areas would be all electric.

Mitigation Analysis

Mitigation Measures **MM-AQ-1** through **MM-AQ-7** would reduce construction-related emissions of criteria air pollutants. Specifically, these mitigation measures would result in reductions in the emissions of particulate matter, NO_X, and VOCs from construction activities. However, because the type and intensity of future construction activities are unknown at this time, the project would result in significant direct and cumulative impacts from construction-related emissions with implementation of mitigation measures.

To reduce emissions from operations, Mitigation Measures MM-AQ-8 through MM-AQ-13 would be required for all development proposed under the Alpine CPU. Mitigation Measures MM-AQ-8 through MM-AQ-13 would reduce emissions from natural wood burning fireplaces in residential units, consumer products and landscaping equipment, water heating, and vehicle use. While methods for estimating criteria air pollutant emissions may exist for the construction and operational mitigation measures, not all were quantified for various reasons. Quantification of all construction mitigation measures is not feasible due to the unknown timeline for which construction of projects in the Alpine CPA would occur and the intensity for construction activities associated with individual projects. Further quantification for some operational mitigation measures is not feasible due to the currently unknown level to which mitigation measures would reduce criteria air pollutant emissions, the level to which the mitigation measure would be applied to a specific project, and the time at which a project would be developed. Based on the mitigation measures and the constraints for feasibly quantifying reductions from them, only reductions of criteria air pollutants from the implementation of MM-AQ-8 was quantified in Table 2.3-11. The application of this mitigation measure would result in relatively significant reductions of operational VOC emissions by prohibiting the installation of wood burning fireplaces and stoves in new developments.

As shown in Table 2.3-10, application of mitigation measure MM-AQ-8 would reduce estimated emissions of criteria air pollutants. However, buildout under the proposed project and the increased density and intensity proposed is still anticipated to exceed County SLTs under mitigated conditions. Therefore, the impact would remain significant and unavoidable.

Table 2.3-11. Modeled Maximum Daily Emissions of Criteria Air Pollutants and Precursors Emissions (lb/day) Associated with the *Mitigated* Alpine CPU Buildout

	lb/day					
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Alpine CPU						
Natural Gas Usage	9	76	42	<1	6	6
Architectural Coating	74	<1	<1	<1	<1	<1
Consumer Products	488	<1	<1	<1	<1	<1
Hearth	10,207	309	13,811	28	1,970	1,970
Landscaping	32	12	1,043	<1	6	6
Mobile	257	586	2,970	10	196	81
Total	11,067	984	17,865	38	2,178	2,062
Net Change from Unmitigated Proposed Project Emissions	9,140	69	10,072	16	1,379	1,379
Exceed Significant Threshold?	Yes	No	Yes	No	Yes	Yes
Significance Threshold	75	250	550	250	100	55

Source: Appendix D

lb/day = pounds per day VOC = volatile organic compound NO = oxides of nitrogen CO = carbon monoxide

SOx = oxides of sulfur PM_{10} = respirable particulate matter $PM_{2.5}$ = fine particulate matter

Notes: Totals may not add exactly due to rounding. Emissions from industrial sources were modeled in separate CalEEMod files to show no increase in industrial uses beyond existing conditions. Details are shown in Appendix D.

2.3.7.3 Issue 3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

The following 2011 General Plan EIR mitigation measures and mitigation measures specific to the Alpine CPU in combination with the 2011 General Plan policies would reduce the project's exposure of sensitive receptors. However, due to construction and operational details being unknown, sensitive receptor exposure should be analyzed on a project-by-project bases. Therefore, impacts would be **significant and unavoidable** (Impact-AQ-3, Impact C-AQ-3).

2011 General Plan EIR Mitigation Measures

Implementation of the 2011 General Plan EIR mitigation measures (see Appendix B, 2011 General Plan EIR Mitigation Measures) would reduce the proposed project's impacts to conflicts with air quality plans.

Infeasible Mitigation Measures

As part of the preparation of the 2011 General Plan EIR, the County determined that the following measures were infeasible; these measures have been reviewed and again been deemed infeasible for the proposed project and will not be implemented.

- Require that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity.
- Explanation: This measure would limit which construction contractors would be allowed to work within the County because not all contractors have alternative power source equipment available and the measure could result in undue costs to the project applicant. Limiting the construction contractors allowed to work within the unincorporated County would protect individual character of existing communities while balancing housing, employment and recreational opportunities. In addition, the County cannot monitor and enforce all construction activities within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from off-road construction equipment.
- Require all diesel trucks that travel on County roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level.
- Explanation: This measure is considered to be infeasible because the County cannot monitor all diesel traffic within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from vehicles. Implementing this measure would result in increased public costs, which would conflict with the proposed project's objective to minimize public costs of infrastructure and services.

Alpine CPU Mitigation Measures

MM-AQ-13 Require projects that propose to develop sensitive receptors within 500 feet of an existing freeway and are determined to have the potential to exacerbate existing TAC-related health risks to prepare a qualified, site-specific health risk assessment (HRA). The HRA shall be conducted in accordance with County guidance and reviewed by both the County and SDAPCD. If the HRA determines that the proposed project would exacerbate an existing health risk to the extent that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million, then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. No further action shall be required if the HRA demonstrates that the level of cancer risk would be less than 10 in 1 million.

2.3.7.4 Issue 4: Result in Other Emissions (Odors) Affecting a Substantial Number of People

Direct and cumulative impacts related to emissions of odors are less than significant.

Adopted 2011 General Plan EIR Mitigation Measures

No mitigation measures were identified for odor-related impacts.

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

2.3.8 Conclusion

2.3.8.1 Issue 1: Conflict with Air Quality Plans

Implementation of the Alpine CPU would increase projected growth from the 2011 General Plan. Due to the increase in residential development and commercial uses, a net increase in VMT is projected from the 2011 General Plan Update. It is estimated that the proposed project would result in an incremental increase in daily VMT, which was not considered in the regional growth projections based on the 2011 General Plan Update. Because the 2011 General Plan was used to inform project growth in the RAQS and SIP, the proposed project would be inconsistent with these relevant air quality plans. The proposed project's conflict with the RAQS and SIP would result in a potentially significant impact with air quality plans (Impact-AQ-1). In addition, because the proposed project is inconsistent with the RAQS and SIP, combining additional growth from future development in the surrounding communities would cumulatively impact air quality plan consistency (Impact-C-AQ-1). Because the County's growth projects may not be updated prior to construction of future proposed projects under the Alpine CPU, Impact-AQ-1 and Impact-C-AQ-1 would be **significant and unavoidable**. Therefore, the impact would be more severe than the prior EIR.

2.3.8.2 Issue 2: Result in Cumulatively Considerable Increase of Nonattainment Criteria Air Pollutants

Implementation of the Alpine CPU would increase construction and operational activities compared to the 2011 General Plan. Because project-specific construction-related activities are unknown, construction emissions are expected to exceed County SLTs. Full build out of the Alpine CPU is also expected to result in an exceedance of the County's SLTs. As such, the proposed project would have the potential to result in potentially significant and cumulative impacts associated with nonattainment criteria air pollutants and would result in adverse health impacts (Impact AQ-2). Due to the construction and operational activities exceedance of the County's SLTs, when combined with other projects in the surrounding communities, a cumulatively considerable impact would occur (Impact C-AQ-2). Implementation of the 2011 General Plan EIR mitigation measures and 2011 General Plan policies, along with Alpine CPU Mitigation Measures MM-AQ-1 through MM-AQ-13 would reduce construction and operational emissions. As noted previously, only mitigation measure MM-AQ-8 could be feasibility quantified and would substantially reduce emissions of criteria air pollutants in the Alpine CPA. While this mitigation measure would result in a decrease in estimated pollutant emissions, it would not reduce impacts to a less than significant level. Impact-AQ-2 and Impact-C-AQ-2 would be **significant and unavoidable**, similar to the prior EIR.

2.3.8.3 Issue 3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Implementation of the Alpine CPU would result in the increase in construction activities from the 2011 General Plan and increased vehicle and truck trips associated with future residential and non-residential uses resulting in increased exposure of sensitive receptors to pollutants generated from on-road vehicles. Therefore, this would be considered a new significant impact of the proposed project (Impact-AQ-4). Additionally, when combined with the future growth and development in adjacent communities, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a cumulative impact of the proposed project (Impact-C-AQ-4). Implementation of the adopted 2011 General Plan policies, the 2011 General Plan EIR mitigation measures, and Alpine CPU Mitigation Measures MM-AQ-13 would reduce Impact-AQ-4 and Impact-C-AQ-4. However, due to project level details

and health risk associated with proposed development being unknown, Impact-AQ-3 and Impact-C-AQ-3 would be **significant and unavoidable**, similar to the prior EIR.

2.3.8.4 Issue 4: Result in Other Emissions (Odors) Affecting a Substantial Number of People

Implementation of the Alpine CPU would not have the potential to affect a substantial number of people with adverse odors, and impacts would be less than significant. Additionally, the Alpine CPU would not contribute to a significant cumulative impact. Impacts related to the generation of odors would be **less than significant**, similar to the prior EIR.

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2.4 Biological Resources

This section of the Supplemental Environmental Impact Report (SEIR) describes the biological resources within the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on special-status plant and wildlife species, riparian habitat and other sensitive natural communities, federally protected wetlands, wildlife movement corridors and nursery sites, local policies and ordinances, and habitat conservation plans (HCPs). This section incorporates information and analysis from the 2011 General Plan EIR and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (FCI EIR) (referred to throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*. of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to biological resources. Table 2.4-1 summarizes the impact conclusions identified in this section.

This section is based on California Environmental Quality Act (CEQA) Guidelines Appendix G and the County of San Diego Guidelines for Determining Significance for Biological Resources (County of San Diego 2010). This section also describes the potential impacts from the proposed project and the changes in density and intensity allowed compared to the County's General Plan, that in turn could impact special-status species, riparian habitat, wetlands, wildfire corridors and nursery sites, adopted policies and ordinances, and HCPs.

Table 2.4-1 summarizes the impact conclusions identified in this section.

Comments received during the Notice of Preparation (NOP) scoping process included concerns regarding potential impacts on the draft East County Multiple Species Conservation Program and Pre-approved Mitigation Areas (PAMAs); wetlands and riparian habitat; listed and other sensitive plant and wildlife species, including nesting birds; effects of lighting, noise, human activity, exotic species, and drainage; wildlife corridor and movement areas; conflicts between human and wildlife interface; habitat degradation, loss, and fragmentation; effects on Critical Biological Areas of the Cleveland National Forest (CNF); and effects on ecosystem services such as filtration of runoff. These concerns are addressed and summarized in this section.

A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIRs as applicable to the Alpine CPU (proposed project).

2.4.1 Existing Conditions

The Alpine CPA is located within San Diego County's mountainous Peninsular Range, situated in the foothills of the Cuyamaca Mountains. The area is rugged and diverse, ranging from densely vegetated drainages and riparian areas to semi-arid hilly terrain, to the peaks of Viejas Mountain and El Cajon Mountain. Elevation within the Alpine CPA ranges from 1,500 feet above mean sea level (amsl) to 4,100 feet amsl. The prior EIRs included a discussion of existing conditions related to biological resources in Sections 2.4.1 of Chapter 2. This section incorporates information from the prior EIRs related to the existing conditions in the Alpine CPA. Minor changes in the existing land use and vegetation community composition are summarized below and an updated list of potentially occurring special-status species is also provided to reflect potential changes regarding the species that may be affected by the proposed project.

Table 2.4-1: Biological Resources Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact	Project Cumulative Impact	Level of Significance After Mitigation
BIO-1	Special-Status Plant and Wildlife Species	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-2	Riparian Habitat and Other Sensitive Natural Communities	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-3	Federally Protected Wetlands	Less than Significant	Potentially Significant	Less than Significant	Less than Significant
BIO-4	Wildlife Movement Corridors and Nursery Sites	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
BIO-5	Local Policies and Ordinances	Less than Significant	Less than Significant	Less than Significant	Less than Significant
BIO-6	Habitat Conservation Plans	Less than Significant	Less than Significant	Less than Significant	Less than Significant

The specific vegetation communities existing within each subarea are detailed in Section 2.4.3.1.

2.4.1.1 Vegetation Communities

The prior EIRs provided a discussion of 20 aggregated vegetation types that occur within the San Diego region based on vegetation community classifications consistent with Oberbauer (2005). Of those 20 vegetation types, nine occur within the Alpine CPA:

- Chaparral
- Coastal Sage Scrub
- Grasslands
- Marshes
- Meadows and Seeps (includes Vernal Pools)
- Other Woodlands
- Riparian Vegetation
- Water
- Urban Disturbed Habitat, Agriculture, Eucalyptus Woodland.

Descriptions of these nine vegetation communities are generally unchanged from those analyzed under the prior EIRs.

Based on a review of full-color aerial imagery (SANDAG 2017a), the land use patterns and existing vegetation communities from the San Diego Association of Governments (SANDAG) geographic

information system (GIS) layer (SANDAG 2017b) were updated to reflect development that has occurred since certification of the prior EIRs. Some previously native vegetation has been converted to developed areas within the Alpine CPA. Table 2.4-2 below provides acreages of each vegetation type in the Alpine CPA, while Table 2.4-3 provides vegetation acreages within each of the seven subareas. Figures 2.4-1a and 2.4-1b identify the updated aggregated vegetation types and land cover within the seven subareas.

Table 2.4-2: Existing Aggregated Vegetation Types within the Alpine Community Plan Area

Vegetation Community	Area within Alpine CPA (acres)
Chaparral	48,069
Coastal Sage Scrub	3,537
Grassland	1,360
Marsh	1
Meadows and Seeps	44
Other Woodlands	3,153
Riparian Vegetation	2,251
Water	1,241
Disturbed, Urban, Agriculture, Eucalyptus Woodland	8,470
Total	**68,124[1]**

[1] It should be noted that the acreages are approximate due to various limitations and rounding.

Table 2.4-3: Existing Aggregated Vegetation Types within Subareas

Land Use/ Vegetation Community	Approximate Acreage within Subarea							Total within Subareas (acres)
	1	2	3	4	5	6	7	
Chaparral	30.66	14.03	51.75	168.41	1,561.07	1.44	8,139.67	9,967.03
Coastal Sage Scrub	2.82	10.50	0.00	98.91	0.00	0.00	132.99	245.22
Disturbed, Urban, Agriculture, Eucalyptus Woodland	24.23	107.56	39.03	282.76	353.98	83.45	1,668.60	2,559.61
Grassland	0.00	8.91	4.74	93.92	0.00	6.47	66.17	180.21
Marsh	0.00	0.00	0.00	0.00	0.00	0.00	0.97	0.97
Other Woodlands	0.00	0.00	14.73	0.00	53.66	1.37	1,704.84	1,774.60
Riparian Vegetation	0.00	1.61	3.97	8.10	111.81	12.21	346.08	483.78

2.4.1.2 Sensitive Resources

Sensitive resources are defined in the prior EIRs as the following: (1) vegetation communities that are unique, of relatively limited distribution, or of particular value to wildlife; and (2) species that have been given special-status by federal or state agencies, or are included in regional conservation plans due to limited, declining, or threatened populations. Special-status plant and wildlife species are recognized by

the County, US Fish and Wildlife Service (USFWS federal), California Department of Fish and Wildlife (CDFW state), and the California Native Plant Society (CNPS).

Critical habitat is a term defined and used in the federal Endangered Species Act (ESA) for federally listed plant and wildlife species. Land development activities that involve a federal permit, license, or funding, and are likely to destroy or adversely modify critical habitat require consultation with USFWS. Critical habitat is the habitat essential to the conservation of an endangered or threatened species and may include areas that are not currently occupied by the species but will be needed for its recovery. Critical habitat is designated for three federally listed species (chaparral, San Diego thornmint, and Mexican flannelbush) that occur or have the potential to occur in or in the vicinity of the Alpine CPA (Figures 2.4-2a and 2.4-2b).

Special-Status Plants

Sixty-two special-status plant species occur or have the potential to occur within the Alpine CPA based on updated information from the California Natural Diversity Database (CNDDB) (CDFW 2019a) (Table 2.4-4); one species is federally endangered, two species are threatened, and there are no federal candidates for listing within the Alpine CPA. Additionally, three species are listed by the state as endangered and four are listed as rare. There are no species listed as state threatened or candidates for listing within the Alpine CPA. Under the County's designations, 41 are County List A, eight are List B, one is List C, and three are List D. These special-status plant species are identified in Table 2.4-4 below.

Table 2.4-4. Special-Status Plant Species with Potential to Occur within the Alpine Community Plan Area

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
County List A[4]					
Peninsular navarretia	*Navarretia peninsularis*	None	None	1B.2	Mesic. Chaparral (openings), lower montane coniferous forest, meadows and seeps, pinyon and juniper woodland.
Campo clarkia	*Clarkia delicata*	None	None	1B.2	Cismontane woodland, chaparral.
chaparral beargrass	*Nolina cismontane*	None	None	1B.2	Chaparral, coastal scrub.
Cuyamaca larkspur	*Delphinium hesperium* ssp. *cuyamacae*	None	SR	1B.2	Lower montane coniferous forest, meadows.
Dean's milk-vetch	*Astragalus deanei*	None	None	1B.1	Chaparral, coastal scrub, riparian forest.
decumbent goldenbush	*Isocoma menziesii* var. *decumbens*	None	None	1B.2	Chaparral, coastal scrub (sandy, often in disturbed areas).
Dehesa beargrass	*Nolina interrata*	None	SE	1B.1	Chaparral.
Dunn's mariposa-lily	*Calochortus dunnii*	None	SR	1B.2	Closed-cone coniferous forest, chaparral.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
Encinitas baccharis	*Baccharis vanessae*	FT	SE	1B.1	Chaparral.
felt-leaved monardella	*Monardella hypoleuca* ssp. *lanata*	None	None	1B.2	Chaparral, cismontane woodland.
Gander's pitcher sage	*Lepechinia gander*	None	None	1B.3	Gabbroic or meta-volcanic. Closed-cone coniferous forest, chaparral, coastal scrub, valley and foothill grassland.
Gander's ragwort	*Packera ganderi*	None	SR	1B.2	Chaparral.
Hammitt's clay-cress	*Sibaropsis hammittii*	None	None	1B.2	Valley and foothill grassland, chaparral.
Jacumba milk-vetch	*Astragalus douglasii* var. *perstrictus*	None	None	1B.2	Rocky. Chaparral, cismontane woodland, pinyon and juniper woodland, riparian scrub, valley and foothill grassland.
Laguna Mountains alumroot	*Heuchera brevistaminea*	None	None	1B.3	Broadleaved upland forest, chaparral, cismontane woodland, riparian forest.
Laguna Mountains goldenbush	*Ericameria cuneata* var. *macrocephala*	None	None	1B.3	Chaparral (granitic).
Lakeside ceanothus	*Ceanothus cyaneus*	None	None	1B.2	Closed-cone coniferous forest, chaparral.
lemon lily	*Lilium parryi*	None	None	1B.2	Mesic. Lower montane coniferous forest, meadows and seeps, riparian forest, upper montane coniferous forest.
long-spined spineflower	*Chorizanthe polygonoides* var. *longispina*	None	None	1B.2	Chaparral, coastal scrub, meadows, valley and foothill grassland.
Mexican flannelbush	*Fremontodendron mexicanum*	FE	SR	1B.1	Closed-cone coniferous forest, chaparral, cismontane woodland.
Morena currant	*Ribes canthariforme*	None	None	1B.3	Chaparral.
Nuttall's scrub oak	*Quercus dumosa*	None	None	1B.1	Sandy, clay loam. Closed-cone coniferous forest, chaparral, coastal scrub.
Orcutt's brodiaea	*Brodiaea orcuttii*	None	None	1B.1	Vernal pools, valley and foothill grasslands, closed-cone coniferous forest, cismontane woodland, chaparral, meadows.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
Orcutt's linanthus	*Linanthus orcuttii*	None	None	1B.3	Chaparral, lower montane coniferous forest.
Otay manzanita	*Arctostaphylos otayensis*	None	None	1B.2	Chaparral, cismontane woodland.
Parish's chaenactis	*Chaenactis parishii*	None	None	1B.3	Chaparral.
Parry's tetracoccus	*Tetracoccus dioicus*	None	None	1B.2	Chaparral, coastal scrub.
Ramona horkelia	*Horkelia truncata*	None	None	1B.3	Chaparral, cismontane woodland.
Robinson's pepper-grass	*Lepidium virionic* var. *robinsonii*	None	None	4.3	Chaparral, coastal scrub.
San Diego goldenstar	*Bloomeria clevelandii*	None	None	1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools.
San Diego milk-vetch	*Astragalus oocarpus*	None	None	1B.2	Chaparral, cismontane woodland, meadows.
San Diego sunflower	*Hulsea californica*	None	None	1B.3	Lower montane coniferous forest, upper montane coniferous forest, chaparral.
San Diego thorn-mint	*Acanthomintha ilicifolia*	FT	SE	1B.1	Chaparral, coastal scrub, valley and foothill grassland, vernal pools.
San Miguel savory	*Clinopodium chandleri*	None	None	1B.2	Chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland.
snake cholla	*Cylindropuntia californica* var. *californica*	None	None	1B.1	Chaparral, coastal scrub.
southern jewelflower	*Streptanthus campestris*	None	None	1B.3	Chaparral, lower montane coniferous forest, pinyon and juniper woodland.
southern mountains skullcap	*Scutellaria bolanderi* ssp. *austromontana*	None	None	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest.
Tecate cypress	*Hesperocyparis forbesii*	None	None	1B.1	Closed-cone coniferous forest, chaparral.
Tecate tarplant	*Deinandra floribunda*	None	None	1B.2	Chaparral, coastal scrub.
variegated dudleya	*Dudleya variegata*	None	None	1B.2	Chaparral, coastal scrub, cismontane, valley and foothill grassland, vernal pools.
velvety false lupine	*Thermopsis californica* var.	None	None	1B.2	Lower montane coniferous forest, meadows and seeps,

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
	semota				cismontane woodland, valley and foothill grassland.
County List B[4]					
Cedros Island oak	*Quercus cedrosensis*	None	None	2B.2	Closed-cone coniferous forest, chaparral, coastal scrub.
Cove's cassia	*Senna covesii*	None	None	2B.2	Dry, sandy desert washes and slopes. Sonoran desert scrub.
Cuyamaca cypress	*Hesperocyparis stephensonii*	None	None	1B.1	Closed-cone coniferous forest, chaparral, riparian forest.
Munz's sage	*Salvia munzii*	None	None	2B.2	Chaparral, coastal scrub.
Palmer's goldenbush	*Ericameria palmeri* var. *palmeri*	None	None	1B.1	Coastal scrub, chaparral.
San Diego County alumroot	*Heuchera rubescens* var. *versicolor*	None	None	3.3	Chaparral, lower montane coniferous forest.
San Diego marsh-elder	*Iva hayesiana*	None	None	2B.2	Marshes and swamps, playas.
sticky geraea	*Geraea viscida*	None	None	2B.2	Chaparral.
County List C[4]					
Mission Canyon bluecup	*Githopsis diffusa* ssp. *filicaulis*	None	None	3.1	Chaparral.
County List D[4]					
Laguna Mountains jewelflower	*Streptanthus bernardinus*	None	None	4.3	Chaparral, lower montane coniferous forest.
Palmer's grapplinghook	*Harpagonella palmeri*	None	None	4.2	Clay, open grassy areas within shrubland. Chaparral, coastal scrub, valley and foothill grassland.
San Diego sagewort	*Artemisia palmeri*	None	None	4.2	Sandy, mesic. Chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland.
Not on County List					
Abrams' spurge	*Euphorbia abramsiana*	None	None	2B.2	Sandy. Mojavean desert scrub, Sonoran desert scrub.
chaparral ash	*Fraxinus parryi*	None	None	2B.2	Chaparral.
prairie wedge grass	*Sphenopholis obtusata*	None	None	2B.2	Mesic. Cismontane woodland, meadows and seeps.
San Bernardino aster	*Symphyotrichum defoliatum*	None	None	1B.2	Meadows and seeps, marshes and swamps, coastal scrub, cismontane woodland, lower

Common Name	Scientific Name	Federal Status[1]	State Status[2]	CNPS Rank[3]	Habitat Associations
					montane coniferous forest, grassland.
San Diego gumplant	*Grindelia hallii*	None	None	1B.2	Meadows, valley and foothill grassland, chaparral, lower montane coniferous forest.
San Luis Obispo sedge	*Carex obispoensis*	None	None	1B.2	Often serpentinite seeps, sometimes gabbro; often on clay soils. Closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, valley and scrub grassland.
singlewhorl burrobrush	*Ambrosia monogyra*	None	None	2B.2	Chaparral, Sonoran desert scrub.
vanishing wild buckwheat	*Eriogonum evanidum*	None	None	1B.1	Chaparral, lower montane coniferous forest, pinyon and juniper woodland.
white rabbit-tobacco	*Pseudognaphalium leucocephalum*	None	None	2B.2	Sandy, gravelly. Chaparral, cismontane woodland, coastal scrub, riparian woodland.

Sensitivity Status:

[1]**Federal**: Federal Endangered Species Act (ESA) Threatened or Endangered

FE – listed as endangered under the federal Endangered Species Act.

FT – listed as threatened under the federal Endangered Species Act.

[2]**State**: California Endangered Species Act (CESA) Threatened or Endangered

SE – listed as endangered under the California Endangered Species Act.

ST – listed as threatened under the California Endangered Species Act.

SR – listed as rare under the California Endangered Species Act.

SC – candidate for listing under the California Endangered Species Act.

[3]**CNPS Rare Plant Rank**:

1B: Considered rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California, but more common elsewhere

3: Plants for which we need more information – review list.

4: Plants of limited distribution – watch list.

Decimal notations: .1 – Seriously endangered in California, .2 – Fairly endangered in California, .3 – Not very endangered in California.

[4]**County List**

A: Plants rare, threatened, or endangered in California or elsewhere.

B: Plants rare, threatened, or endangered in California but more common elsewhere.

C: Plants which may be rare but need more information to determine their true rarity status.

D: Plants of limited distribution and are uncommon, but not presently rare or endangered.

It should be noted that all species common names and scientific names are taken from USFWS, CDFW and CNPS data available at the time of publication.

Special-Status Wildlife

Table 2.4-5 lists a total of 50 special-status wildlife species that occur, or have the potential to occur, within the Alpine CPA. Of these species, 16 are amphibians or reptiles, 12 are birds, 17 are mammals, and five are invertebrates. Four of these species are federally endangered, one species is threatened, and one species is candidate for federal listing. Additionally, two species are state endangered, two species are state threatened, no species are candidates for state listing, and 28 species are California Species of Special Concern. Seven species are on the CDFW watch list and one species has fully protected status under the Fish and Game Code. Under the County's designations, 18 are Group 1 and 26 are Group 2 species. Table 2.4-5 identifies these species and defines the County Groups.

Table 2.4-5. Special-Status Wildlife Species with Potential to Occur within the Alpine Community Plan Area

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
County Group 1[3]				
arroyo toad	*Anaxyrus californicus*	FE	SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, and desert washes.
Bell's sparrow	*Artemisiospiza belli*	None	WL	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range.
coastal cactus wren	*Campylorhynchus brunneicapillus sandiegensis*	None	SSC	Coastal sage scrub with tall Opuntia cactus for nesting and roosting.
coastal California gnatcatcher	*Polioptila californica californica*	FT	SSC	Low, coastal sage scrub in arid washes, on mesas, and on slopes.
Cooper's hawk	*Accipiter cooperii*	None	WL	Open interrupted, or marginal type woodland. Nest sites mainly found in riparian growths of deciduous trees in canyon bottoms on river floodplains.
golden eagle	*Aquila chrysaetos*	None	WL/FP	Rolling foothills, mountain areas, sage-juniper flats, and desert.
Hermes copper butterfly	*Lycaena hermes*	FC	None	Found in southern mixed chaparral and coastal sage scrub at western edge of Laguna Mountains.
least Bell's vireo	*Vireo bellii pusillus*	FE	SE/SSC	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
prairie falcon	*Falco mexicanus*	None	WL	Inhabits dry, open terrain, either level or hilly.
quino checkerspot butterfly	*Euphydryas editha quino*	FE	None	Sunny openings within chaparral and coastal sage scrublands.
southern California rufous-crowned sparrow	*Aimophila ruficeps canescens*	None	WL	Found in coastal sage scrub and sparse mixed chaparral.
southwestern pond turtle	*Actinemys pallida*	None	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation.
southwestern willow flycatcher	*Empidonax traillii extimus*	FE	SE	Riparian woodlands.
Swainson's hawk	*Buteo swainsoni*	None	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees.
Thorne's hairstreak butterfly	*Callophrys thornei*	None	None	Associated with the endemic Tecate cypress (*Cupressus forbesii*).
tricolored blackbird	*Agelaius tricolor*	None	ST/SSC	Requires open water, protected nesting substrate, and foraging area with available insect prey.
two-striped gartersnake	*Thamnophis hammondii*	None	SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation.
yellow-breasted chat	*Icteria virens*	None	SSC	Summer resident that inhabits riparian thickets of willow and other brushy tangles near watercourses.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
County Group 2[3]				
American badger	*Taxidea taxus*	None	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.
big free-tailed bat	*Nyctinomops macrotis*	None	SSC	Low-lying arid areas in southern California.
Blainville horned lizard	*Phrynosoma blainvillii*	None	SSC	Inhabits coastal sage scrub and chaparral in arid and semi-arid climate conditions.
coast patch-nosed snake	*Salvadora hexalepis virgultea*	None	SSC	Brushy or shrubby vegetation in coastal southern California.
Coast Range newt	*Taricha torosa*	None	SSC	Lives in terrestrial habitats and will migrate over 1 kilometer to breed in ponds, reservoirs, coastal drainages, or slow-moving streams.
coastal whiptail	*Aspidoscelis tigris stejnegeri*	None	SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodlands and riparian areas.
Coronado skink	*Plestiodon skiltonianus interparietalis*	None	WL	Found in grassland, chaparral, pinyon-juniper and juniper sage woodland, and pine-oak and pine forests.
Dulzura pocket mouse	*Chaetodipus californicus femoralis*	None	SSC	Found in coastal scrub, chaparral, and grasslands.
long-eared myotis	*Myotis evotis*	None	None	Found in all brush, woodland and forest habitats from sea level to about 9,000 feet. Prefers coniferous woodlands and forests.
long-legged myotis	*Myotis volans*	None	None	Most common in woodland and forest

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
				habitats above 4,000 feet.
northwestern San Diego pocket mouse	*Chaetodipus fallax*	None	SSC	Found in coastal scrub, chaparral, grasslands and sagebrush.
orange-throated whiptail	*Aspidoscelis hyperythra*	None	WL	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats.
pallid bat	*Antrozous pallidus*	None	SSC	Found in deserts, grasslands, shrublands, woodlands, and forests. Not common in open, dry habitats with rocky areas for roosting.
pocketed free-tailed bat	*Nyctinomops femorosaccus*	None	SSC	Variety of arid areas in southern California including pine-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian.
red-diamond rattlesnake	*Crotalus ruber*	None	SSC	Found in chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains.
rosy boa	*Charina trivirgata*	None	None	Found in desert and chaparral from the coast to the Mojave and Colorado deserts. Prefers moderate to dense vegetation and rocky cover.
San Diego black-tailed jackrabbit	*Lepus californicus bennettii*	None	SSC	Found in coastal sage scrub with intermediate canopy stages of shrub habitats and open shrub/herbaceous and tree/herbaceous edges.

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
San Diego desert woodrat	*Neotoma lepida intermedia*	None	SSC	Moderate to dense canopies of coastal scrub. Abundant in rock outcrops, rocky cliffs, and slopes.
San Diego ringneck snake	*Diadophis punctatus similis*	None	None	Found in open, fairly rocky areas and in moist areas near intermittent streams.
silvery legless lizard	*Anniella pulchra pulchra*	None	SSC	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks, where soil is moist.
Townsend's big-eared bat	*Corynorhinus townsendii*	None	SSC	Found in moist coastal forest to semi-desert scrublands, near riparian areas and wetlands.
western mastiff bat	*Eumops perotis californicus*	None	SSC	Found in many open and semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral.
western red bat	*Lasiurus blossevillii*	None	SSC	Prefers riparian areas dominated by cottonwoods, oaks, sycamores, and walnuts.
western small-footed myotis	*Myotis ciliolabrum*	None	None	Found in a wide range of habitats near water, including arid wooded, brushy uplands, and open stands in forests and woodlands. Seeks cover in caves, buildings, mines and crevices.
western spadefoot	*Spea hammondii*	None	SSC	Occurs primarily in grassland habitats but can be found in valley-

Common Name	Scientific Name	Federal Status[1]	State Status[2]	Habitat Associations
				foothill hardwood woodlands.
Yuma myotis	*Myotis yumanensis*	None	None	Optimal habitats are open forests and woodlands with sources of water over which to feed.
Not on County List				
California glossy snake	*Arizona elegans occidentalis*	None	SSC	Inhabits arid scrub, rocky washes, grasslands and chaparral.
harmonius halictid bee	*Halictus harmonius*	None	None	Known only from the foothills of the San Bernardino Mountains. Possibly, also the San Jacinto Mountains.
hoary bat	*Lasiurus cinereus*	None	None	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees.
peak shoulderband snail	*Helminthoglypta milleri*	None	None	Found in rock piles at Cuyamaca Peak.
western yellow bat	*Lasiurus xanthinus*	None	SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.

Status:

[1]Federal

FE – listed as endangered under the federal Endangered Species Act.
FT – listed as threatened under the federal Endangered Species Act.
FC – candidate for listing under the federal Endangered Species Act.

[2]State

SE - listed as endangered under the California Endangered Species Act.
ST – listed as threatened under the California Endangered Species Act.
SC – candidate for listing under the California Endangered Species Act.
FP – fully protected species in California.
SSC – species of special concern in California.
WL – CDFW watch list.

[3]County Group

Group 1 - listed as threatened or endangered, or with a natural history requirement that increases their sensitivity.

Group 2 - becoming less common but are not so rare that extinction is imminent without immediate action.

It should be noted that all species common names and scientific names are taken from USFWS and CDFW data available at the time of publication.

Critical Habitat

The prior EIRs identified USFWS-designated critical habitat for the arroyo toad. Critical habitat has since been designated within the Alpine CPA for coastal California gnatcatcher and San Diego thornmint as shown in Table 2.4-6 and Figures 2.4-2a and 2.4-2b.

Within the seven subareas, only portions of Subareas 4, 5, and 7 contain critical habitat as shown in Table 2.4-7 and Figures 2.4-2a and 2.4-2b. Subarea 5 contains critical habitat for arroyo toad and Subareas 4 and 7 contain critical habitat for coastal California gnatcatcher. Critical habitat for San Diego thornmint exists within Subarea 7.

Table 2.4-6: USFWS Critical Habitat within the Alpine Community Plan Area

Common Name	Scientific Name	Approximate Area within Alpine CPA (acres)
Arroyo toad	*Anaxyrus californicus*	2,414
Coastal California gnatcatcher	*Polioptila californica californica*	2,888
San Diego thornmint	*Acanthomintha ilicifolia*	756
Total		**6,057**

Table 2.4-7: USFWS Critical Habitat within the Seven Subareas

Common Name	Approximate Acreage within Subarea							Total within Subareas
	1	2	3	4	5	6	7	
Arroyo toad	0.00	0.00	0.00	0.00	278.87	0.00	474.43	753.30
Coastal California gnatcatcher	0.00	0.00	0.00	0.22	0.00	0.00	174.73	174.95
San Diego thornmint	0.00	0.00	0.00	0.00	0.00	0.00	203.74	203.74

2.4.1.3 Wildlife Movement Corridors and Habitat

As described in the prior EIRs, the Multiple Species Conservation Program (MSCP) County of San Diego Subarea Plan (South County Subarea Plan), of which the Alpine CPA is a part, identified core habitat areas and priority linkages between them. A habitat linkage, which is currently undeveloped/native habitat, was identified within the western portion of Alpine CPA in the South County Subarea Plan, linking habitat patches from southern San Diego County to important aquatic resources at El Capitan Reservoir (Figures 2.4-4a and 2.4-4b). The urbanized areas within the Alpine CPA generally do not provide regionally significant wildlife movement corridors, although the undeveloped areas within the Alpine CPA would provide opportunities for wildlife movement and constitute habitat linkages between other undeveloped areas in the County. It is important to note that the eastern portion of the Alpine CPA is within the CNF, which also encompasses large areas of the Central Mountain CPA to the north and east and Mountain Empire and Jamul-Dulzura CPAs to the south. US Forest Service (USFS) lands provide regional habitat linkages and wildlife movement opportunities as development is generally prohibited.

In addition to regional habitat linkages, the Alpine CPA contains drainages, creeks, valleys, and other undeveloped areas that provide opportunities for localized wildlife movement within the Alpine CPA. Within the subareas, Subarea 5 is largely undeveloped and provides opportunities for wildlife movement. The southern portion of Subarea 5 encompasses a portion of the Sweetwater River valley, which provides wildlife movement to Palo Verde Lake.

2.4.2 Regulatory Framework

Sections 2.4.2 of the prior EIRs included a discussion of the regulatory framework related to biological resources and is incorporated by reference. The regulations described in the prior EIRs are the same as the regulations evaluated for the proposed project. No changes to those regulations have been identified that would alter the conclusions from the prior EIRs. All regulations used from the prior EIRs were reviewed to ensure they are still valid and are incorporated by reference.

Applicable federal regulations include:

- Federal ESA
- Migratory Bird Treaty Act
- Bald and Golden Eagle Protection Act
- Federal Water Pollution Control Act.

Applicable state regulations include:

- California Fish and Game Code
- California ESA
- Lake and Streambed Alteration Program
- Porter-Cologne Water Quality Control Act
- Natural Community Conservation Planning (NCCP) Act of 1991.

Applicable local regulations include:

- San Diego County Zoning Ordinance
- Multiple Species Conservation Program (MSCP)
- County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Biological Mitigation Ordinance (BMO)
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608 Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 76.801-67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO)
- County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, Habitat Loss Permit (HLP) Ordinance
- San Diego County Board of Supervisors (BOS) Policy I-123, Conservation Agreement for the MSCP.

Applicable local regulations not included in or adopted after adoption of the 2011 General Plan or FCI EIR are described below.

2.4.2.1 Habitat Loss Permit Ordinance

The HLP Ordinance was adopted in March of 1994 as a response to both the listing of the coastal California gnatcatcher as a federally threatened species and the adoption of the NCCP Act by the State of California. Pursuant to the Special 4(d) Rule under the federal ESA, the County is authorized to issue "take permits" for the California gnatcatcher (in the form of HLPs) in lieu of Section 7 or 10(a) Permits typically required from USFWS. Although issued by the County, the wildlife agencies must concur with the issuance of an HLP for it to become valid as a take authorization under the federal ESA. The HLP Ordinance states that projects must obtain an HLP prior to the issuance of a grading permit, clearing permit, or improvement plan if the project will directly or indirectly impact any of several coastal sage scrub habitat types. The Ordinance requires an HLP if coastal sage scrub or related habitat will be impacted, regardless of whether the site is currently occupied by gnatcatchers. HLPs are not required for projects within the boundaries of the MSCP since take authorization is conveyed to those projects through compliance with the MSCP. HLPs are also not required for projects that have separately obtained Section 7 or 10(a) permits for take of the gnatcatcher.

The "Planning Agreement by and among the County of San Diego, the California Department of Fish and Game, and the United States Fish and Wildlife Service regarding the North and East County Multiple Species Conservation Program Plans: Natural Community Conservation Program Plans and Habitat Conservation Plans" expired as of January 31, 2020 and HLPs are not being issued at this time. If the County, USFWS, and CDFW do not enter into a new planning agreement, all individual projects impacting coastal sage scrub habitat would be required to obtain individual incidental take permits (Section 7 or 10(a) permits), as applicable."

2.4.2.2 Multiple Species Conservation Plan

The County of San Diego is in the process of developing an HCP (the last of three) for the eastern unincorporated area. The HCPs will work together to protect sensitive plants, animals, and their habitats in the unincorporated areas. At present, the County Subarea Plan (South County Plan) is being implemented and the draft North County Plan is in process. The East County Plan is a cooperative effort among the County, USFWS, and CDFW. Authority for this process comes from the California NCCP Act and Section 10(a) of the federal ESA that addresses HCPs.

At this time, the East County Plan is in preliminary stages and is scheduled to be further developed after adoption of the draft North County Plan. A portion of the Alpine CPA is within the South County Plan boundaries, while the remainder is within the boundaries of the draft East County Plan. Given the state of the East County Plan, analysis under this SEIR has largely considered the South County Plan as the presiding natural community conservation plan (NCCP).

2.4.2.3 Conservation Subdivision Program

The Conservation Subdivision Program (CSP) was developed to encourage residential subdivision design that results in the preservation of local biodiversity, retention of existing agriculture/farmland, and other benefits to sensitive environmental resources. This program is mandatory when subdividing property with General Plan residential land use designations of Semi-Rural 10 and Rural Lands 20, 40, and 80. The CSP is being implemented through the Zoning Ordinance, Subdivision Ordinance, and the RPO.

2.4.2.4 Zoning Ordinance Sections 8900–8980, Alpine Village Core Regulations (Adopted July 31, 2014)

The Alpine Village Core regulations apply to the area identified in the Alpine CPA as the Village Core and are intended to preserve and promote the village character while creating a balanced automobile, bicycling, and pedestrian-friendly environment for residents, business owners, and visitors. These regulations are also intended to encourage the continuation and growth of the character of Alpine while promoting the economic development of the Alpine Village Core. These regulations establish permitted uses, development standards, design standards, and thoroughfare design standards. The Land Development Code is currently being updated, and the Alpine Village Core Regulations may be revised as part of that process.

2.4.2.5 County of San Diego General Plan Policies

The General Plan includes goals and policies intended to protect biological resources within the Conservation and Open Space Element, as well as the Land Use Element.

Conservation and Open Space Element

Goal COS-1 is to create and maintain a regionally managed, interconnected preserve system that embodies the regional biological diversity of San Diego County. Policies COS-1.1 through COS-1.11 support this goal by describing how biological resources should be managed and preserved. Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS 1.7, and COS-1.8 require the creation of a coordinated preserve system, within which private development is prohibited, to be monitored and managed by enforcement staff and volunteer preserve managers, and the policies also provide for funding to manage these preserve systems. Policies COS-1.4, COS-1.5, COS-1.8, and COS-1.10 require collaboration with other jurisdictions and the public to fund and achieve resource management goals. Policy COS-1.9 requires the prevention and removal of invasive species within and adjacent to biological preserves.

Goal COS-2 is to protect and create sustainable ecosystems and sustainable development. Policies COS-2.1 and COS-2.2 support this goal by requiring development to minimize impacts to natural habitat

Goal COS-3 is to protect and restore wetlands. Policies COS-3.1 and COS-3.2 support this goal by requiring development projects to preserve natural wetland areas and mitigate for any loss of wetlands and associated habitat functions and values.

Land Use Element

Goal LU-6 is to build development that balances the natural environment, scarce resources, natural hazards, and local character. Policies LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, and LU-6.7 support this goal by describing how development should be designed, sited, and implemented. Policies LU-6.1 and LU-6.7 require the protection of natural resources and creation of open space. Policies LU-6.2, LU-6.3, LU-6.4, and LU-6.6 require that projects and subdivisions be designed to consolidate the project footprint and use sustainable development practices (including incorporation of natural features) as well as maintain low density land uses in areas with sensitive natural resources.

Goal LU-10 is to utilize semi-rural and rural lands to protect natural resources, foster agriculture, and accommodate unique rural communities. Policy LU-10.2 supports this goal by requiring development in semi-rural and rural areas to preserve natural features and rural character, and to avoid sensitive resources.

2.4.2.6 Alpine CPU Policies

The following are policies from the Alpine CPU that are applicable to biological resources:

Land Use Element

Policy LU-6.1: Encourage cooperation with other agencies for trading and otherwise negotiating land transfers to consolidate land holdings.

Mobility Element

Policy M-1.6: Encourage the replacement of all trees lost during road construction/renovation projects.

Conservation and Open Space Element

Policy COS-1.1: Promote conservation education in the community and schools.

Policy COS-2.1: Explore incentives and tax breaks for planting trees and consider support for removal of non-native vegetation.

Policy COS-3.1: Encourage preservation/conservation of open space corridors that connect the community of Alpine to the following:

- Cleveland National Forest
- El Capitan and Loveland Reservoirs
- Sweetwater River Basin

2.4.3 Analysis of Project Effects and Determination of Significance

Based on guidance provided in the Guidelines and the Appendix G of the state CEQA Guidelines, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.
- Have a substantial adverse effect on federally protected wetlands as defined by the Clean Water Act (CWA) Section 404 through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted HCP; NCCP; or other approved local, regional, or state HCP

2.4.3.1 Issue 1: Special-Status Plant and Wildlife Species

Guidelines for the Determination of Significance Analysis

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Impact Analysis

The prior EIRs determined that the General Plan would increase development in habitat inhabited by special-status plant and wildlife species and would have potentially significant direct, indirect, and cumulatively considerable impacts on these species. The discussion of impacts related to special-status plant and wildlife species from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference.

Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and cumulative impacts to the extent feasible, impacts on special-status plant and wildlife species from implementation of the General Plan were concluded to be significant and unavoidable.

In addition to a proposed increase in density and intensity, the proposed project has goals and policies that could help to reduce impacts from future development projects implemented under the proposed project, but also have the potential to create impacts on the environment. Therefore, the potential impacts from the goals and policies are described below.

This section includes an analysis of the proposed project's impacts on special-status plant and wildlife species. Special status species are defined in Sections 2.4.1.3 of the prior EIRs, and in Section 2.4.1.2 of this SEIR.

Direct Impacts

Vegetation Communities

Future development associated with the Alpine CPU could result in the removal of vegetation and habitats that support sensitive species. The estimated total area of impacts on vegetation communities found within the subareas is shown in Table 2.4-8, which provides a comparison of vegetation impacts under the General Plan and the proposed project.

As shown in Table 2.4-8, impacts to vegetation communities would be greater under the proposed project than the General Plan. Higher proposed densities and intensity would generally result in greater direct impacts on biological resources due to increased land area that could be developed. To accommodate the growth associated with buildout of the Alpine CPU and the changes proposed to the Mobility Element, it is anticipated that new or expanded infrastructure would also be required, such as the extension of roads and utility services. While most of the subareas are within parts of the community currently serviced by existing infrastructure, Subareas 4 and 5 are primarily large undeveloped areas. Future development within these subareas would likely include new roads or paving over existing dirt roads and the extension

Table 2.4-8: Impacts on Vegetation Communities within Subareas

Land Use/ Vegetation Community	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Chaparral	3,130.29	3,727.50
Coastal Sage Scrub	90.87	181.71
Grasslands	48.83	137.64
Marsh	0.12	0.12
Meadows and Seeps	0.00	0.00
Other Woodlands	445.25	458.80
Riparian Vegetation	154.28	223.42
Water	0.00	0.00
Disturbed, Urban, Agriculture, Eucalyptus Woodland	1,155.99	1,484.19
Total	**5,025.61**	**6,213.37**

of utilities such as electrical power lines, telecommunications facilities, and sewer/water lines. Future development associated with the proposed project and the extension of infrastructure to accommodate this development and growth would likely require the removal of vegetation and habitat.

It should be noted that the acreages of vegetation community impacts provided in Table 2.4-8 are approximate due to various limitations, including the minimum size of features not able to be mapped; the potential presence of certain vegetation communities, such as coast live oak trees, within larger vegetation communities; and the potential that additional disturbance has occurred since vegetation mapping was completed. Site-specific analysis of impacts on biological resources, including biological resource surveys if deemed required by the County, would be required for future discretionary projects that could impact vegetation communities and special-status plant and wildlife species.

In addition, the following describes the vegetation communities and special-status plant and wildlife species within each subarea that could be impacted by future development associated with the proposed project.

Subarea 1

The eastern portion of Subarea 1 is generally developed and therefore does not contain any natural vegetation communities. However, the western portion of the subarea is currently undeveloped. Subarea 1 contains areas mapped as chaparral, urban-disturbed habitat, agriculture, and eucalyptus woodland. Special status plant species commonly associated with chaparral habitat include, but are not limited to, Dehesa beargrass, Dunn's mariposa lily, Encinitas baccharis, Gander's ragwort, Mexican flannelbush, and San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with this habitat type). In addition, special-status wildlife species commonly associated with chaparral habitat include, but are not limited to, Hermes copper butterfly, quino checkerspot butterfly, Coronado skink, Dulzura pocket mouse, northwestern San Diego pocket mouse, and red-diamond rattlesnake (see Table 2.4-5 for a full list of wildlife species associated with this habitat type).

Subarea 1 would maintain the same density and intensity of development as currently allowed under the General Plan. As such, because development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 1 and the special-status species they support would not be more severe than those identified in the prior EIRs.

However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 2

Subarea 2 is predominantly developed with residences, but also contains chaparral, coastal sage scrub, grasslands, disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with chaparral habitat are described above under Subarea 1. Tables 2.4-3 and 2.4-4 show the full list of plant and wildlife species associated with chaparral habitat. Special status plant species commonly associated with coastal sage scrub and grasslands include San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with this habitat type). Special status wildlife species commonly associated with coastal sage scrub include, but are not limited to, coastal cactus wren, coastal California gnatcatcher, Hermes copper butterfly, quino checkerspot butterfly, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and San Diego desert woodrat (see Table 2.4-5 for a full list of wildlife species associated with this habitat type). Special status wildlife species commonly associated with grasslands include, but are not limited to, Swainson's hawk, Coronado skink, Dulzura pocket mouse, and northwestern San Diego pocket mouse (see Table 2.4-5 for a full list of wildlife species associated with grasslands).

The re-designation of land uses within Subarea 2 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 2 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-1).

Subarea 3

Subarea 3 is sparsely developed and includes large-lot homes that are generally separated by lots containing natural open space. Subarea 3 contains several vegetation communities, including areas mapped as chaparral, other woodlands, grassland, riparian forest, urban, disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with chaparral habitat are described above under Subarea 1. Special status plant species commonly associated with other woodlands, grassland, and riparian forest include, but are not limited to, Cuyamaca larkspur and San Diego thornmint (see Table 2.4-4 for a full list of plant species associated with these habitat types). In addition, special-status wildlife species commonly associated with these habitats include, but are not limited to, southwestern willow flycatcher, Swainson's hawk, yellow-breasted chat, coastal western whiptail, Coronado skink, Dulzura pocket mouse, and northwestern San Diego pocket mouse (see Table 2.4-5 for a full list of wildlife species associated with these habitat types).

Subarea 3 would maintain the same density and intensity of development as currently allowed under the General Plan. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 3 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 4

Subarea 4 is occupied by low-density residential uses, Los Coches Creek Middle School, and large areas of undeveloped open space. Subarea 4 contains several vegetation communities, including areas mapped as chaparral, coastal sage scrub, grasslands, urban-disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with these habitat types are described above under Subareas 1 through 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively. Subarea 4 also contains 0.22 acre of critical habitat for the coastal California gnatcatcher (Figure 2.4-2a).

The re-designation of land uses within Subarea 4 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 4 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-1).

Subarea 5

Subarea 5 is dominated by natural, undeveloped open space, some of which is located within the CNF. Subarea 5 is largely undeveloped and contains 278.87 acres of critical habitat for the arroyo toad (Figure 2.4-2a). Subarea 5 contains several vegetation communities, including areas mapped as chaparral, other woodlands, riparian forest, urban - disturbed habitat, agriculture, and eucalyptus woodland. The special-status plant and wildlife species commonly associated with these habitat types are described above under Subareas 1 and 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively.

The re-designation of land uses within Subarea 5 would reduce the density and intensity of development than currently allowed under the General Plan. The proposed project would redistribute land uses to include the following land use designations: Village Residential (VR-2), Semi-Rural Residential (SR-1; SR-4; SR-10), Rural Lands (RL-20; RL-40), General Commercial (GC), Rural Commercial (RC), and Public Agency Lands (PAL). This redistribution of land uses would result in a total decrease in density of 31 units.

As such, because the development potential under the proposed project would decrease compared to the General Plan, impacts on the vegetation communities and habits within Subarea 5 and the special-status species they support would not be more severe than those identified in the prior EIRS. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Subarea 6

Subarea 6 is almost entirely developed, containing small pockets of vegetation in the western portion of the subarea. Subarea 6 contains areas predominantly mapped as urban, disturbed habitat, agriculture, and eucalyptus woodland, with small areas of chaparral and riparian forest. The special-status plant and wildlife species commonly associated with chaparral and riparian forest habitats are described above under Subareas 1 and 3. In addition, plant and wildlife species associated with these habitats are listed in Tables 2.4-4 and 2.4-5, respectively.

While the re-designation of land uses within Subarea 6 would allow for a change in land use than allowed under the current General Plan, Subarea 6 is almost entirely developed and contains minimal amounts of

vegetation. However, Subarea 6 still contains vegetation communities and habitats that support special-status plant and wildlife species. Development potential under the proposed project would increase compared to the General Plan; therefore, impacts to vegetation communities within Subarea 6 and the special-status species they support would be more severe than those identified in the prior EIRs. Impacts to special-status plant and wildlife species would be **potentially significant** and mitigation is required (Impact-BIO-1).

Subarea 7

The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use types within Subarea 7 are proposed by the project. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on the vegetation communities and habits within Subarea 7 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-1) and mitigation would be required.

Critical Habitat

USFWS-designated critical habitat for three species occurs within the Alpine CPA. Future development associated with the proposed project would potentially result in the direct loss of critical habitat for coastal California gnatcatcher and the arroyo toad. All potential impacts to critical habitat for coastal California gnatcatcher (0.22 acre) would occur within Subarea 4 (Table 2.4-9). Critical habitat for coastal California gnatcatcher, arroyo toad, and San Diego thornmint is present within Subarea 7; however, no changes to the land use designations would occur under the proposed project. Because overall impacts on critical habitat would be greater under the proposed project, these impacts would be considered more severe than those identified in the prior EIRs (Impact-BIO-1).

Table 2.4-9: Impacts on Critical Habitat within Alpine CPU Subareas

Species	General Plan Impacts (acres)	Proposed Project (acres)
arroyo toad	279.57	480.42
coastal California gnatcatcher	20.97	21.18
San Diego thornmint	90.64	90.64
Total	**391.18**	**592.24**

It should be noted that not all impacts on critical habitat identified in Table 2.4-9 may occur within habitat areas that provide primary constituent elements[1] of habitat for the arroyo toad or coastal California gnatcatcher. Some areas mapped as critical habitat are located in developed or disturbed areas (i.e., urban, disturbed habitat, agriculture, eucalyptus woodland) that do not provide habitat for these species. Potential impacts on critical habitat would require site-specific analysis and project-level details during discretionary review of future projects associated with the Alpine CPU.

[1] Primary constituent elements are physical or biological features essential to the conservation of a species for which its designated or proposed critical habitat is based on (USFWS 2004).

Indirect Impacts

The types of potential indirect impacts on special-status species and their habitats as a result of future development associated with the Alpine CPU are generally the same as those described in the prior EIRs, and include the following:

- Decreased water quality in riparian areas may adversely affect vegetation and wildlife.
- Fugitive dust produced by construction would have potential to reduce the overall vigor of individual plants, increasing their susceptibility to pests or disease.
- Colonization of nonnative plants from construction sites into adjacent native habitats.
- Edge effects due to construction of new roadways or other development that have the potential to fragment habitat. Increased human activity adjacent to undeveloped areas has the potential to increase the effects of habitat fragmentation.
- Construction of roadways and utility infrastructure has the potential to deter wildlife movement, degrade existing vegetation, compact soils, change natural runoff patterns, facilitate the invasion of nonnative species, and increase chances of fire.
- Increased traffic and construction noise have the potential to reduce reproductive success of breeding birds.
- Night lighting on native habitats has the potential to increase predation by nocturnal predators and disrupt essential behavioral and ecological processes.

Because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to cause a more severe significant indirect impacts compared to those identified in the prior EIRs. Indirect impacts are **potentially significant** and mitigation would be required (Impact-BIO-1).

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect special-status plant and wildlife species in the County that are also applicable to the Alpine CPU.

The BMO sets out specific mitigation requirements for impacts to sensitive species to protect the high number of sensitive plants and animal species occurring in and outside of the preserved areas throughout the County.

The federal ESA provides a program for the conservation of federally listed endangered and threatened species, which are those deemed of esthetic, ecological, educational, historical, recreational, and scientific value.

The California Fish and Game Code and California ESA require that mitigation measures or alternatives be taken to address a particular impact on a candidate species, threatened species, or endangered species to conserve, protect, restore, and enhance any endangered species or threatened species as designated by the California ESA.

Furthermore, the General Plan includes Policy COS-1.3 within the Conservation Element, which requires the monitoring, management, and maintenance of a regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.

Discretionary projects are reviewed for impacts to special-status plant and wildlife species based on the County's Biological Guidelines and CEQA. These guidelines require that evaluations include whether subsequent projects would directly, indirectly, or cumulatively result in impacts to these species. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to special-status plant and wildlife species.

Summary of Impacts

The proposed project would re-designate land uses within four of seven subareas of the Alpine CPA, overall increasing density and intensity in the CPA beyond what was analyzed in the prior EIRs. Individual projects allowed under the proposed project would be required to conduct site-specific biological resources surveys, if deemed necessary by the County, to determine the extent of potential impacts on special-status species and sensitive habitat. In addition, future development projects would be required to comply with federal, state, and local laws and regulations (listed above in Section 2.4.2) that are in place to protect special-status species and their habitats. Each of these laws and regulations is fully described in the prior EIRs. Despite mandatory compliance with laws and regulations, direct and indirect impacts on special-status species and their habitats could still occur. Because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to result in more severe significant impacts on special-status species and sensitive habitat compared to those identified in prior EIRs (Impact-BIO-1).

Implementation of General Plan policies and mitigation measures would reduce the proposed project's impacts on special-status species and sensitive habitat, but not below a level of significance because it cannot be ensured that impacts from future development could be fully mitigated. Therefore, Impact-BIO-1 would be **potentially significant** and mitigation would be required.

2.4.3.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

Impact Analysis

The prior EIRs determined that implementation of the General Plan would increase development in riparian habitat that would have the potential to result in significant direct, indirect, and cumulatively considerable impacts on riparian habitat. The discussion of impacts related to riparian habitat from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and cumulative impacts to the extent feasible, impacts on riparian habitat and other sensitive natural communities were concluded to be significant and unavoidable.

Section 2.4.3.1, Issue 1, discusses the potential impacts of the proposed project on vegetation community types, some of which are considered sensitive natural communities. Sensitive natural communities analyzed in Section 2.4.3.1 include chaparral, coastal sage scrub, and grasslands, therefore, this section focuses solely on riparian habitats. Riparian habitats within the Alpine CPA that could be impacted include Southern Cottonwood-Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Riparian Forest.

Direct Impacts

Direct impacts on riparian habitats would include removal or disturbance due to new development associated with the proposed project. Potential direct impacts on riparian habitats were estimated using the same methodology described in Section 2.4.3.1. All subareas except Subarea 1 contain riparian habitat. Table 2.4-10 shows the approximate acreage of riparian habitats potentially impacted by the proposed project, as well as a comparison of riparian habitat impacts under the General Plan.

Table 2.4-10: Impacts on Riparian Habitat

Riparian Community	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Southern Cottonwood-Willow Riparian Forest	25.51	12.88
Southern Coast Live Oak Riparian Forest	114.73	160.46
Southern Riparian Forest	4.47	4.47
Total	**144.71**	**177.81**

As shown in Table 2.4-10, impacts on riparian habitat would be greater under the proposed project than the General Plan. Higher proposed densities and intensities would generally result in greater impacts on these resources due to increased land area that could be developed. It should be noted that the acreages of riparian habitat impacts provided in Table 2.4-10 are approximate due to various limitations, similar to those described under Issue 1. Site-specific analysis of impacts on riparian habitat, including biological resource surveys if deemed required by the County, would be required for future discretionary projects that could impact riparian habitat.

In addition, the following describes the riparian habitats within each subarea that could be impacted by future development associated with the proposed project.

Subarea 1

Subarea 1 does not contain any riparian habitat nor are there any proposed changes to this subarea. As such, **no impacts** would occur as a result of the proposed project.

Subarea 2

Subarea 2 is predominantly developed with residences and does not contain large areas of natural vegetation. However, Subarea 2 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 2 include chaparral, coastal sage scrub, and grasslands, as discussed under Issue 1. The re-designation of land uses within Subarea 2 would allow for higher density and intensity development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 2 would be more severe than

those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2).

Subarea 3

Subarea 3 is sparsely developed and includes large-lot homes that are generally separated by lots containing natural open space. Subarea 3 contains areas mapped as Southern Riparian Forest and Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 3 include chaparral and grasslands. Therefore, because the development potential under the proposed project would not increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 3 would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Subarea 4

Subarea 4 is occupied by low-density residential uses, Los Coches Creek Middle School, and large areas of undeveloped open space. Subarea 4 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 4 include chaparral, coastal sage scrub, and grasslands. The re-designation of land uses within Subarea 4 would allow for higher density and intensity of development than currently allowed under the General Plan. As such, because the development potential under the proposed project would increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 4 would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2).

Subarea 5

Subarea 5 is dominated by natural, undeveloped open space, some of which is located within the CNF under jurisdiction of USNFS. Subarea 5 contains areas mapped as Southern Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. Other sensitive vegetation communities within Subarea 5 include chaparral and other woodlands. The re-designation of land uses within Subarea 5 would reduce the density of development from that currently allowed under the General Plan.

As such, because the development potential under the proposed project would decrease compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 5 and the special-status species they support would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Subarea 6

Subarea 6 is almost entirely developed, containing small pockets of vegetation in the western portion of the subarea. However, Subarea 6 contains areas mapped as Southern Coast Live Oak Riparian Forest. Other sensitive vegetation communities within Subarea 6 include small areas of chaparral. While the re-designation of land uses within Subarea 6 would allow for higher density and intensity of development than currently allowed under the General Plan, Subarea 6 is almost entirely developed and contains minimal amounts of vegetation. However, Subarea 6 still contains riparian habitat and other sensitive natural communities. As such, because the development potential under the proposed project would

increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 6 would be more severe than those identified in the prior EIRs. Impacts would be **potentially significant** and mitigation would be required (Impact-BIO-2)

Subarea 7

Subarea 7 contains areas mapped as Southern Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. The existing land use designations of Subarea 7 are SR-1, SR-2, SR-4, SR-10, RL-20, RL-40, RL-80, C-4, P/SP, TL, and VCMU. No changes to the land use types within Subarea 7 are proposed by the project. As such, because the development potential under the proposed project would not increase compared to the General Plan, impacts on riparian habitat and other sensitive natural communities within Subarea 7 would not be more severe than those identified in the prior EIRs. However, similar to the prior EIRs, impacts would be **potentially significant** (Impact-BIO-2) and mitigation would be required.

Indirect Impacts

The types of indirect impacts on riparian and other sensitive habitats that would potentially occur from future development associated with the proposed project are fundamentally consistent with those described in the prior EIRs. In addition to indirect impacts described in Section 2.4.3.1, indirect impacts on riparian habitats would also include the following:

- Degradation of water quality due to runoff
- Drawdown of the groundwater table due to increased development
- Modification of the natural flow of streams
- Increased stormwater runoff.

These changes would similarly result in modified streamflow or introduction of pollutants to riparian habitats. As further discussed in Section 2.8, *Hydrology and Water Quality*, it is anticipated that both point and non-point source pollutants caused by increased future development as a result of the proposed project would potentially degrade water quality of surface waters. Additionally, implementation of the proposed project would potentially result in significant impacts on groundwater supply and recharge. These direct hydrological effects would, therefore, result in potentially significant indirect impacts on riparian habitats. Accordingly, because the proposed project would allow for increased density and intensity compared to the General Plan, potential indirect impacts on riparian habitats would be more severe than those identified in the prior EIRs (Impact-BIO-2).

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect riparian habitat and sensitive natural communities in the County that are also applicable to the Alpine CPU.

The RPO requires that controls be placed on development to preserve sensitive biological habitats and that certain discretionary projects require Resource Protection Studies to protect sensitive lands and prevent their degradation and loss.

The BMO directs preservation of land that can be combined into contiguous areas of habitat and identifies habitat and vegetation communities on discretionary project sites and areas proposed for mitigation.

The County of San Diego Code of Regulatory Ordinances Sections 86.501-86.509, HLP Ordinance provides a methodology through which the County is authorized to issue "take permits" for the California gnatcatcher (in the form of HLPs) in lieu of Section 7 or 10(a) Permits typically required from USFWS, which apply to coastal sage scrub habitat regardless of whether the habitat is occupied by the California gnatcatcher.

Furthermore, the General Plan includes Policy COS-3.1 within the Conservation Element, which requires development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Discretionary projects are reviewed for impacts to riparian habitat and sensitive natural communities based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to riparian habitat and sensitive natural communities.

Summary of Impacts

With the exception of Subarea 1, all other subareas contain riparian habitat, including Southern Cottonwood-Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, and Southern Riparian Forest. Future projects allowed under the proposed project would be required to conduct site-specific biological resources surveys to determine the extent of potential impacts on riparian habitat. However, because the proposed project would allow for increased density and intensity compared to the General Plan, associated project activities have the potential to result greater impacts on riparian habitat and other sensitive natural communities (as discussed under Issue 1). Therefore, direct and indirect impacts on riparian habitat and other sensitive natural communities associated with the proposed project would be more severe than those identified in the prior EIRs (Impact-BIO-2).

General Plan policies would reduce the potential for proposed land uses and development associated with the proposed project to result in substantial adverse effects on riparian habitat and other sensitive natural communities by requiring preservation of wetlands and associated buffers. Implementation of General Plan policies and mitigation measures would reduce the proposed project's impacts on riparian habitat and other sensitive natural communities, but not below a level of significance because it cannot be ensured that sensitive habitat impacted by future development could be replaced and that any necessary resource agency permits would be issued. Therefore, Impact-BIO-2 would be **potentially significant** and mitigation would be required.

2.4.3.3 Issue 3: Federally Protected Wetlands

Guidelines for the Determination of Significance

Based on the Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Have a substantial adverse effect on federally protected wetlands as defined by the CWA Section 404 through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

Federally protected wetlands are defined in CWA Section 404 as areas inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands

generally include swamps, marshes, bogs, certain riparian areas, and similar areas. Federal wetlands are areas that meet all of the following criteria: have vegetation adapted to wetland conditions (hydrophytic vegetation), evidence of soil that has been altered by anerobic conditions from frequent inundation (hydric soils), and evidence of wetland hydrology. The County's RPO definition of wetland mirrors the USFWS wetland definition and is generally broader and more encompassing as it only requires the presence of one of the following: hydrophytic vegetation, hydric soils, or an ephemeral or perennial stream whose substrate is predominately non-soil.

The prior EIRs determined future development would result in potentially significant direct and indirect impacts on federally protected wetlands but would not result in a cumulatively considerable impact on federally protected wetlands. The discussion of impacts related to federally protected wetlands from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies by requiring implementation of the RPO and BMO; minimization of edge effects; requiring development projects to obtain CWA Section 401/404 permits; and preservation of wetlands and wetland buffers.

Table 2.4-11 summarizes the wetland types within the seven subareas, as well as the estimated acreages of impacts under the General Plan and proposed project. The mapping data used to identify wetland areas potentially impacted by the proposed project (Figures 2.4-3a and 2.4-3b) are conceptual in nature and would need to be verified through site-specific project-level surveys and wetland delineations.

Table 2.4-11: Potential Impacts on Wetlands

Wetland Type[1]	Existing Area within Alpine CPU Subareas (acres)	General Plan Impacts (acres)	Proposed Project Impacts (acres)
Federal Wetlands	103.08	13.56	49.65
County RPO Wetlands	532.82	183.27	257.17
Total	**635.90**	**196.83**	**306.83**

Notes:

[1] There is some overlap between federal and County RPO wetlands within the Alpine CPA as well as each of the subareas. As a result, the acreages provided in this table are a conservative estimate of wetlands that could be impacted under the General Plan and the proposed project.

As shown in Table 2.4-11, the proposed project could result in greater impacts on federally protected and County RPO wetlands compared to the General Plan. Direct impacts on federally protected and County RPO wetlands would occur if future development associated with Alpine CPU resulted in the removal, filling, hydrological interruption, or other disturbance to these resources. County GIS data were utilized to determine the approximate location and acreages of federally protected and County RPO wetlands within the seven subareas. It should be noted that the acreages of wetlands impacts identified in Table 2.4-11 are approximate estimates of potential impacts. As such, specific impacts on wetlands can only be determined through site-specific surveys, a wetland delineation, and project-level details once future discretionary projects are proposed.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect federally protected wetlands in the County that are also applicable to the Alpine CPU.

The RPO requires that controls be placed on development to preserve the County's wetlands and that certain discretionary projects require Resource Protection Studies to protect sensitive lands and prevent their degradation and loss.

The County of San Diego Code of Regulatory Ordinances Sections 76.801-67.814, WPO protects water resources and improves water quality by regulating stormwater runoff, which could have adverse effects on wetland resources.

Furthermore, the General Plan includes Policies COS-3.1 and COS-3.2 within the Conservation Element, which requires development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement and requires development projects to mitigate any unavoidable losses of wetlands, including their habitat functions and values; and to protect wetlands from a variety of discharges and activities.

Discretionary projects are reviewed for impacts to federally protected wetlands based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related to federally protected wetlands.

Summary of Impacts

As summarized in Table 2.4-11, approximately 49.65 acres of federally protected wetlands and 257.17 acres of County RPO wetlands would potentially be impacted by future development associated with the proposed project. The proposed project would have the potential to result in substantial habitat loss of wetlands by direct removal (e.g., clearing, grading, or grubbing). Within the seven subareas, federally protected wetlands are present within Subareas 2, 4, 5, and 7. Additionally, County RPO wetlands are present within Subareas 2 through 7. As such, with the exception of Subarea 1, development within all subareas could result in the loss of federally protected and/or County RPO wetlands. Therefore, because the proposed project would allow for increased density and intensity compared to the General Plan, potential impacts on federally protected and County RPO wetlands could be more severe than those identified in the prior EIRs and would be **potentially significant** (Impact-BIO-3).

2.4.3.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis

The prior EIRs determined that future development in undeveloped areas would result in potentially significant direct and indirect impacts on wildlife corridors and nursery sites, as well as cumulative impacts on wildlife corridors and nursery sites. The discussion of impacts related to wildlife corridors and nursery sites from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is hereby incorporated by reference. Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the General Plan's project-level and

cumulative impacts to the extent feasible, impacts on wildlife corridors and nursery sites were concluded to be significant and unavoidable.

Wildlife Corridors

A habitat linkage was identified on the west side of the Alpine CPA within the boundaries of the County's adopted Multiple Species Conservation South County Subarea Plan (SCMSCP), linking habitat patches from south San Diego County to important aquatic resources at El Capitan Reservoir. Approximately 14.5 acres of habitat linkage identified by the SCMSCP is within Subarea 4 of the Alpine CPU area. Future development associated with the proposed project would not result in a significant constriction or blockage to this wildlife movement corridor because this area is within a PAMA and future discretionary development would be required to evaluate this linkage and mitigate as appropriate. Indirect impacts on wildlife corridors may occur from increased noise levels, artificial lighting, visual barriers, or other consequences of land use changes, infrastructure, and increased density. These impacts would increase compared to current levels experienced in Subarea 4 and impacts on wildlife corridors would be **potentially significant**. Therefore, impacts on wildlife corridors would be more severe than those identified in the prior EIRs (Impact-BIO-4).

Nursery Sites

Future development associated with the proposed project would have the potential to result in a significant impact on nursery sites. Determining whether a specific area is a nursery site requires field surveys, which are often only valid for a given breeding season depending on the wildlife species present. As described in Section 2.4.3.1, the proposed project could result in a potentially significant impact on sensitive natural habitats in the Alpine CPA, and various natural habitats have the potential to include nursery sites. Direct impacts on nursery sites from the proposed project include removal of habitat for future development and infrastructure. Indirect impacts on nursery sites could occur from noise, lighting, changes in drainage patterns, and introduction of pests, domestic animals, and/or invasive species. These impacts can substantially interfere with native wildlife nursery sites.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place to protect wildlife movement corridors and nursery sites in the County that are also applicable to the Alpine CPU.

The Migratory Bird Treaty Act protects migratory birds and their nesting sites, and places limitations on development during nesting seasons for migratory birds.

Furthermore, the General Plan includes Policy LU-6.7 within the Land Use Element, which requires projects with open space to design contiguous open space areas that protect wildlife habitat and corridors.

The General Plan also includes Policy COS-1.1 within the Conservation Element, which furthers development of a coordinated biological preserve system that includes PAMAs, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.

Discretionary projects are reviewed for impacts to wildlife movement corridors and nursery sites based on the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process for potential impacts related wildlife movement corridors and nursery sites,

Summary of Impacts

As described under Issue 1, because the proposed project would allow for increased density and intensity compared to the current General Plan, associated project activities have the potential to result in greater impacts on sensitive habitats, some of which have the potential to include nursery sites. As such, direct and indirect impacts on wildlife nursery sites associated with the Alpine CPU would be more severe than those identified in the prior EIRs (Impact-BIO-4) and would be **potentially significant**. Mitigation would be required.

2.4.3.5 Issue 5: Conflict with Local Policies and Ordinances

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County Guidelines for Determining Significance – Biological Resources, the proposed project would result in a significant impact if it would:

- Conflict with one or more local policies or ordinances protecting biological resources.

Impact Analysis

The prior EIRs determined that future development in undeveloped areas would not result in significant direct and cumulative impacts associated with consistency with local policies and ordinances protecting biological resources.

As discussed in detail above under Issues 1 through 4, future development associated with the Alpine CPU has the potential to significantly impact sensitive biological resources identified for protection under the SCMSCP, Guidelines, RPO, BMO, and/or HLP Ordinance. Future discretionary projects within the adopted MSCP South County Subarea Plan would be subject to the County BMO, while projects outside of the MSCP would be subject to the HLP Ordinance. The County's RPO applies throughout the unincorporated County and requires avoidance of impacts to environmentally sensitive lands from discretionary projects. Future development associated with the proposed project would be required to comply with these ordinances, and demonstrate compliance, when applicable. See Section 2.4.3.6 below for a detailed discussion of the subareas.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous local regulations in place in the County that are also applicable to the Alpine CPU. Local policies and ordinances define the standards and requirements under which discretionary projects are reviewed. Local policies include the County of San Diego Zoning Ordinance, RPO, BMO, WPO, MSCP, HLP, and County Board of Supervisors Policy-123, which established the Conservation Agreement for the implementation of the MSCP.

Discretionary projects are reviewed for their conformance with all applicable local policies and ordinances pursuant to the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process to ensure they do not conflict with any applicable local policies or ordinances.

Summary of Impacts

Because development associated with the proposed project would be required to comply with the aforementioned ordinances and policies protecting biological resources, potential impacts would be **less than significant**. Therefore, potential impacts would be similar to those identified in the prior EIRs.

2.4.3.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

Guidelines for the Determination of Significance

Based on CEQA Appendix G and the County Guidelines for Significance – Biological Resources, the proposed project would result in a significant impact if it would conflict with the provisions of any adopted HCP; NCCP; or other approved local, regional, or state HCP.

Impact Analysis

The prior EIRs determined that future development would not conflict with, nor result in, a cumulatively considerable impact to the provisions of HCPs, local policies, and ordinances, and impacts were concluded to be less than significant. The discussion of impacts related to HCPs, local policies, and ordinances from implementation of the General Plan can be found in Sections 2.4 of the prior EIRs and is incorporated by reference.

The MSCP South County Subarea Plan is the applicable adopted HCP and NCCP for portions of the unincorporated County. The Alpine CPA is partially within the adopted SCMSCP. The following analyzes potential conflicts of the proposed project with the SCMSCP and HLP.

Subareas 1, 2, and 4 are entirely within the SCMSCP boundaries, and Subareas 3, 5, 6, and 7 are partially within the SCMSCP boundaries. The portions of the subareas outside of the SCMSCP boundary would be subject to the HLP Ordinance. PAMA within the subareas of the Alpine CPU is generally avoided with the exception of the locations described below (see Figures 2.4-5a and 2.4-5b).

A habitat linkage and PAMA is identified in the western portion of the Alpine CPA connecting natural resources associated with El Capitan Reservoir to Crestridge Ecological Reserve and other undeveloped lands west and southwest of the Alpine CPA. This is the same area discussed above under Issue 4 and, as mentioned, 14.5 acres would be potentially impacted by future development within the eastern edge of Subarea 4. In addition, another designated PAMA (39 acres) is identified within the southwestern side of Subarea 5, which would similarly be impacted by future development within this area. Development could still occur within these designated PAMAs under the General Plan; however, because the proposed project would allow for greater density within these areas, there is a potential that loss of PAMA would be increased compared to the General Plan. Impacts on PAMA would not constitute a conflict with the provisions of the SCMSCP. See Figures 2.4-4a and 2.4-4b.

Future projects associated with the proposed project would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. MSCP Conformance Findings must be prepared for these projects based on both the SCMSCP and BMO standards. Because future development within the SCMSCP would be required to comply with the BMO and make MSCP Conformance Findings, impacts would be **less than significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.4.2, there are numerous federal, state, and local regulations in place in the County that are also applicable to the Alpine CPU. A number of HCPs, including the MSCP and the BMO, guide discretionary development within the County.

Also applicable to the Alpine CPU is the NCCP Act of 1991 which established the NCCP program as overseen by CDFW.

Discretionary projects are reviewed for their conformance with all applicable HCPs and NCCPs pursuant to the County's Biological Guidelines and CEQA. Therefore, when subsequent discretionary projects are proposed for development within the Alpine CPA, these projects would be analyzed through the CEQA process to ensure they do not conflict with any applicable HCPs or NCCPs.

Summary of Impacts

Future projects associated with the proposed project would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. MSCP Conformance Findings must be prepared for these projects based on both the SCMSCP and BMO standards. Because future development within the SCMSCP would be required to comply with the BMO and make MSCP Conformance Findings, impacts would be **less than significant**.

2.4.4 Cumulative Analysis

The geographic scope of the cumulative impact analysis for biological resources includes the communities that surround Alpine, including Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura because the surrounding communities have somewhat similar character and may also be affected by the land use designation changes. It should be noted that all of these communities were considered under the prior EIRs.

The geographic scope addresses biological resources present within the SCMSCP, which includes all of Subareas 1, 2, and 4, as well as portions of Subareas 3, 5, 6, and 7.

The scope also includes the Viejas Reservation, which is located within the Alpine CPA but is not within the jurisdiction of the County. Additionally, portions of the CNF, including lands owned by the USFS, are incorporated into the geographic scope.

2.4.4.1 Issue 1: Special-Status Plant and Wildlife Species

Growth and development within the cumulative study area could result in cumulative impacts on special-status plant and wildlife species through the loss of sensitive habitat and the special-status species it supports, and in the loss of habitat or edge effects that would significantly impact special-status plant and wildlife species.

As described above in Section 2.4.3.1, Issue 1: Special-Status Plant and Wildlife Species, the land use designations within the proposed project would have the potential to result in the removal of vegetation and habitats that support sensitive species as a result of future development activity. In combination with other cumulative projects, the proposed project would have the potential to result in a significant cumulative impact. Although implementation of General Plan policies identified in Section 2.4.2.1 and

mitigation measures identified in Section 2.4.6.1 would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance.

The cumulative study area includes biological resources present within SCMSCP. A comprehensive NCCP is not in place for the long-term protection of special-status plant and wildlife species outside of the adopted SCMSCP boundaries. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of habitat supporting special-status plant and wildlife species could still occur. As identified in the prior EIRs, effects from future growth and development within the cumulative study area would have the potential to result in a significant cumulative impact.

Development associated with the proposed project, when combined with cumulative growth and development within the cumulative study area, would have the potential to increase habitat loss and impacts on special-status species. Therefore, the proposed project's contribution to this cumulative impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (**Impact-C-BIO-1**).

2.4.4.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

A cumulative impact would occur on riparian habitats and sensitive natural communities if development associated with cumulative projected growth within the Alpine CPA or cumulative study area would result in direct and indirect loss or degradation of riparian habitat or other identified sensitive natural communities.

As discussed under Issue 1, this cumulative growth and development would potentially result in the loss of other sensitive habitat that supports special-status species. Cumulative growth and development in adjacent communities, as well as tribal governments and federal and state-managed lands would be required to comply with applicable regulations that provide protections for riparian habitat and other sensitive habitat types. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of riparian and other sensitive habitat supporting special-status plant and wildlife species could still occur. Therefore, cumulative effects from cumulative growth and development would be significant.

Projects located in the geographic scope would have the potential to result in a cumulative impact to riparian habitats and other sensitive natural communities if in combination they would result in loss or degradation of riparian habitat and other sensitive habitat types. As discussed in Section 2.4.3.2, the land use designations within the proposed project would have the potential to result in more severe project-level impacts on riparian habitats. Although implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.2 would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance. Therefore, the proposed project's contribution to this cumulative impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (Impact-C-BIO-2).

2.4.4.3 Issue 3: Federally Protected Wetlands

Projects located in the cumulative study area would have the potential to result in cumulative impacts on federally protected and County RPO wetlands. Mitigation measures would be implemented to reduce impacts to wetlands from individual projects associated with growth and development under the

proposed project. Development associated with projected growth within the cumulative study area would be required to comply with applicable federal regulations such as Sections 401 and 404 of the CWA, as well as the County RPO. Existing regulations would further ensure that a significant cumulative impact associated with federally protected and County RPO wetlands would not occur.

The proposed project would result in land use changes that could increase density and intensity of development in areas where federally protected and County RPO wetlands are present. As discussed in Section 2.4.3.3, development associated with the proposed project could have the potential to impact federally protected and County RPO wetlands, and project-level impacts would be more severe than those identified in the prior EIRs. However, implementation of General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.3, as well as mandatory compliance with federal, state, and local regulations, would reduce this project-level impact to less than significant. Because cumulative projects would also be required to comply with federal, state, and local regulations and mitigate for any potential loss of wetlands, the proposed project's contribution to cumulative impacts on federally protected wetlands would be **less than significant** and similar to the contribution identified in the prior EIRs, and would not be cumulatively considerable.

2.4.4.4 Issue 4: Wildlife Corridors and Nursery Sites

Growth and development located in the cumulative study area would have the potential to result in a cumulative impact to wildlife corridors and nursery sites if, in combination, they would result in loss or degradation of wildlife corridors and nursery sites, or, encroach on the existing designated wildlife movement corridor within the western portion of the Alpine CPA. In addition, cumulative growth and development could result in significant impacts on sensitive habitat, where nursery sites are present. Although mitigation would be required and implemented for significant impacts associated with individual projects, a cumulative loss of habitat supporting special-status plant and wildlife species could still occur. Therefore, cumulative effects from growth and development within the cumulative study area would be significant.

The proposed project would result in land use changes that could increase density and intensity of development in areas where wildlife corridors and nursery sites are located. As discussed in Section 2.4.3.4, future development associated with the proposed project would result in less than significant direct and indirect impacts on wildlife corridors, and impacts would be less severe than those identified in the prior EIRs. However, development associated with the proposed project, when combined with cumulative growth and development within the cumulative study area, would result in a greater loss of nursery sites. Therefore, the proposed project's contribution to this impact would be **potentially significant** and more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (Impact-C-BIO-3).

2.4.4.5 Issue 5: Conflict with Local Policies and Ordinances

Projects under the County's jurisdiction are required to comply with applicable local policies and ordinances, such as the SCMSCP, Southern California Coastal Sage Scrub NCCP Process Guidelines, BMO, RPO, and HLP Ordinance, as applicable, for all project approvals. Projects within the boundaries of the adopted SCMSCP would be required to comply with the BMO, while any projects outside of these boundaries would be required to comply with the Southern California Coastal Sage Scrub NCCP Process Guidelines as implemented by the County HLP Ordinance. Additionally, the County's RPO applies throughout the unincorporated County to avoid wetland impacts from discretionary projects. Therefore, because cumulative growth and development within the cumulative study area would be required to

comply with existing County policies and ordinances protecting biological resources, cumulative effects would be less than significant.

As discussed in detail above in Sections 2.4.3.1 through 2.4.3.4, development associated with the proposed project has the potential to significantly impact sensitive plant and animal species, riparian habitat, and other natural communities; however, development associated with the Alpine CPU would be required to comply with the aforementioned ordinances and policies protecting biological resources. Potential project-level impacts would be less than significant and would be similar to those identified in the prior EIRs. Additionally, implementation of General Plan policies would further reduce the potential for development to conflict with local policies and ordinances protecting biological resources. Because cumulative projects would also be required to comply with these policies and ordinances, the proposed project's contribution to cumulative impacts would be **less than significant** and similar to the contribution identified in the prior EIRs and would not be cumulatively considerable.

2.4.4.6 Issue 6: Conflict with Adopted Habitat Conservation Plans and Natural Community Conservation Plans

Projects located in the cumulative study area would have the potential to result in a cumulative impact to adopted HCPs and NCCPs if, in combination, they would conflict with any adopted conservation plans.

Growth and development within the cumulative study area would be required to comply with applicable HCPs or NCCPs, such as the SCMSCP or the Southern California Coastal Sage Scrub NCCP. Cumulative projects within the boundaries of the SCMSCP would be required to evaluate any potential impacts on biological resources within these areas and mitigate impacts in accordance with the mitigation ratios identified in the BMO. Furthermore, projects located within the boundaries of the adopted SCMSCP are reviewed for consistency with the plan and BMO. These cumulative projects would be required to prepare MSCP Conformance Findings based on both SCMSCP and BMO standards. For cumulative projects outside of the SCMSCP boundaries, the Southern California Coastal Sage Scrub NCCP is the applicable plan. Because cumulative growth and development would be required to comply with these plans and programs, cumulative effects would be less than significant.

Increased density and intensity allowed under the proposed project could potentially affect the formation of future preserve areas by fragmenting habitat, especially in predominantly undeveloped areas. As discussed in Section 2.4.3.6, because future development associated with the proposed project would be required to comply with the applicable HCPs and NCCPs, as well as the local policies and ordinances that support them, the proposed project would result in less than significant project-level impacts associated with conflicts with adopted HCPs and NCCPs, similar to the prior EIRs. Additionally, implementation of General Plan policies identified in policies identified in Section 2.4.2.1 would further reduce the potential for proposed project-related development to conflict with adopted HCPs and NCCPs.

Therefore, the proposed project would not contribute to a significant cumulative impact regarding potential conflicts with applicable HCPs and NCCPs and impacts would be **less than significant** and would be similar to the impacts identified in the prior EIRs, and thus would not be cumulatively considerable.

2.4.5 Significance of Impacts Prior to Mitigation

The following summarizes the potentially significant project-level impacts that would result from implementation of the proposed project prior to mitigation:

Impact-BIO-1: Adversely Affect Special-Status Plant and Wildlife Species. Increased density and intensity associated with the proposed project would result in a more severe loss of sensitive habitat and the special-status plant and wildlife species it supports compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-2: Adversely Affect Riparian Habitat and Other Sensitive Natural Communities. Increased density and intensity associated with the proposed project would result in a more severe loss of riparian habitat and other sensitive natural communities compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-3: Adversely Affect Federally Protected Wetlands. Increased density and intensity associated with the proposed project would result in a more severe direct loss of federally protected and County RPO wetlands compared to the prior EIRs. This would be considered a significant impact.

Impact-BIO-4: Adversely Affect Wildlife Movement Corridors and Nursery Sites. Increased density and intensity associated with the proposed project would have the potential to result in greater impacts on sensitive habitats, some of which have the potential to include nursery sites. As such, direct and indirect impacts on wildlife nursery sites associated with the Alpine CPU would be more severe than those identified in the prior EIRs. This would be considered a significant impact.

Impact-C-BIO-1: Cumulatively Considerable Contribution to Adverse Effects on Special-Status Plant and Wildlife Species. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase habitat loss and potential impacts on special-status species. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.

Impact-C-BIO-2: Cumulatively Considerable Contribution to Adverse Effects on Riparian Habitat and Other Sensitive Natural Communities. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would increase riparian habitat loss. Therefore, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs. This impact would be cumulatively considerable.

Impact-C-BIO-3: Cumulatively Considerable Contribution to Adverse Effects on Wildlife Corridors and Nursery Sites. Future development associated with the Alpine CPU, when combined with cumulative growth and development within the cumulative study area, would result in a greater loss of nursery sites. Therefore, the proposed project's contribution to this impact would be more severe than the contribution identified in the prior EIRs. This impact would be potentially cumulatively considerable.

2.4.6 Mitigation

2.4.6.1 Issue 1: Special-Status Species

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-1 and Impact-C-BIO-1, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts on visual character or quality to below a level of significance. However, the County determined that these measures would be infeasible, as described below.

Therefore, the following mitigation measures would not be implemented:

- Adopt MSCP Plans for North County and East County that provide coverage for special-status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

  Explanation: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and state levels, which the County cannot guarantee ahead of time. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with the proposed project impacts in these areas. Therefore, this measure cannot be considered feasible mitigation for the proposed project.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1 through Bio-1.7 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts on special-status species.

Alpine CPU Mitigation Measures

MM-BIO-1 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially significant biological resource is present on site. If it is determined that potentially significant biological resources are present on site, compliance with the County's Guidelines for Determining Significance – Biological Resources, shall be required. This may require, pursuant to PDS staff determination, the preparation of a technical report or memorandum that would evaluate the biological of the resource and identify appropriate mitigation measures, as required.

2.4.6.2 Issue 2: Riparian Habitats and Other Sensitive Natural Communities

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-2 and Impact-C-BIO-2, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

See measure and discussion in Section 2.4.6.1 above.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-2.1 through Bio-2.4 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts on riparian habitats and other sensitive natural communities

Mitigation measures Bio-1.1 through Bio-1.7 referenced in Section 2.4.6.1 are also applicable to impacts on riparian habitats and other sensitive natural communities.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.3 Issue 3: Federally Protected Wetlands

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-3 to a **less than significant** level.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1, Bio-1.5 through Bio-1.7, and Bio-2.2 through Bio-2.4. Implementation of these mitigation measures would reduce the proposed project's impacts to federally protected wetlands.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-BIO-4 and Impact-C-BIO-3, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

See measure and discussion in Section 2.4.6.1 above.

General Plan EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Bio-1.1 through Bio-1.7 and Bio-2.3. Implementation of these mitigation measures would reduce the proposed project's impacts on wildlife movement corridors and nursery sites.

Alpine CPU Mitigation Measures

See mitigation measure MM-BIO-1 under Issue 1 above.

2.4.6.5 Issue 5: Conflict with Local Policies and Ordinances

The proposed project would not result in any new or more severe impacts related to conflicts with local policies or ordinances protecting biological resources. Therefore, impacts would be equivalent or less severe than those analyzed by the prior EIRs and would be **less than significant**. No mitigation measures would be required.

2.4.6.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

The proposed project would not result in any new or more severe impacts related to conflicts with HCPs and NCCPs. Therefore, impacts would be equivalent or less severe than those analyzed by the prior EIRs and would be **less than significant**. No mitigation measures would be required.

2.4.7 Conclusion

2.4.7.1 Issue 1: Special-Status Species

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of special-status species and sensitive habitat. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-1). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and **would be cumulatively considerable** (Impact-C-BIO-1). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.1, in addition to compliance with applicable regulations, would reduce impacts on special-status species and sensitive habitat but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.2 Issue 2: Riparian Habitats and Other Sensitive Natural Communities

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of riparian habitat. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-2). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs **and would be cumulatively considerable** (Impact-C-BIO-2). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.2, in addition to compliance with applicable regulations, would reduce impacts on riparian habitat and other sensitive natural communities but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.3 Issue 3: Federally Protected Wetlands

Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of federally protected wetlands and would result in a more severe potentially significant impact

than those identified in the prior EIRs. However, for the reasons described above, implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.3, as well as compliance with federal, state, and local regulations, would reduce this project-level impact to **less than significant** (Impact-BIO-3). In addition, because cumulative growth and development would also be required to comply with federal, state, and local regulations and mitigate for any loss of wetlands, the proposed project's contribution to cumulative impacts on federally protected and County RPO wetlands would be similar to the contribution identified in the prior EIRs, and **would not be cumulatively considerable**.

2.4.7.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

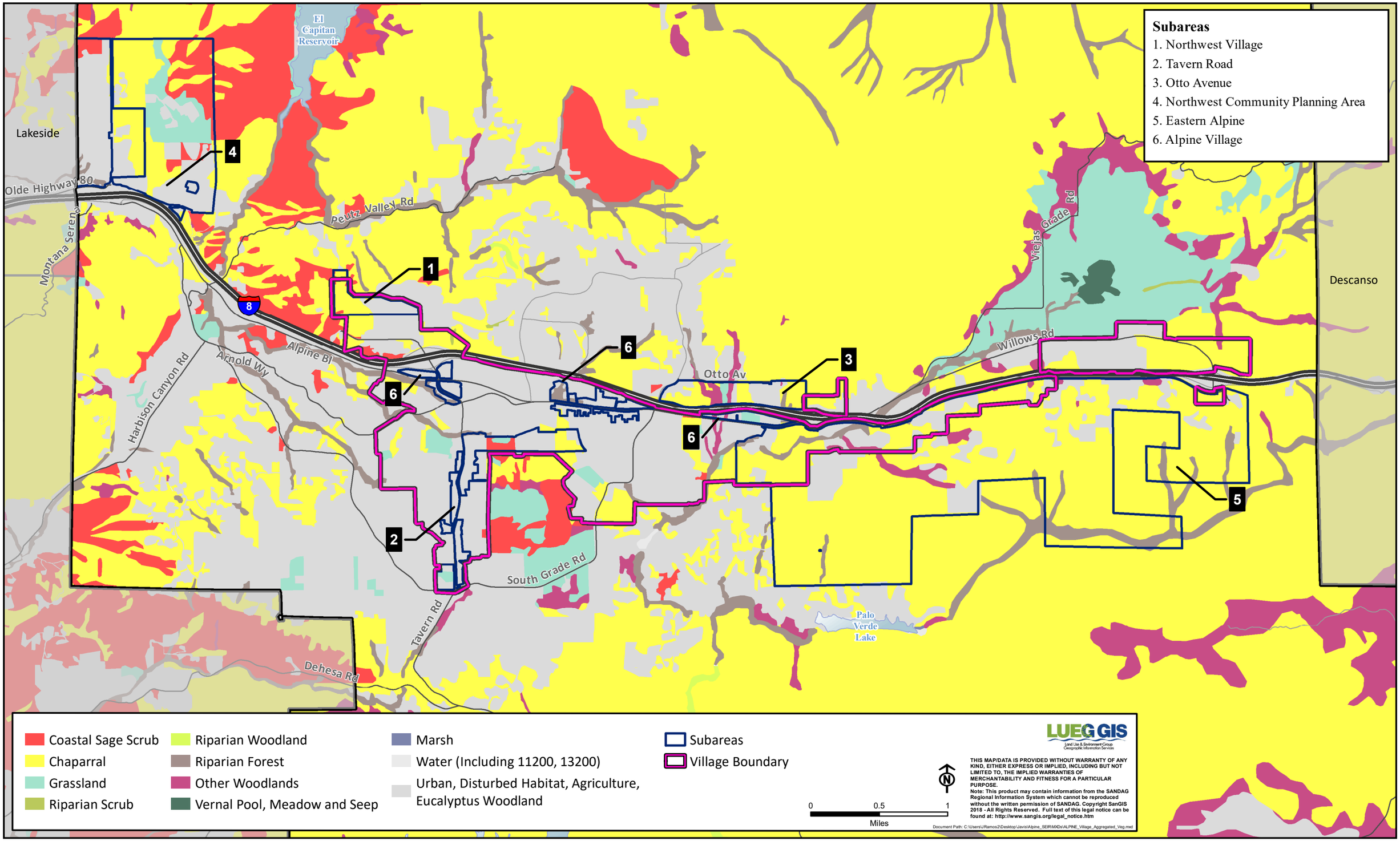
Development allowed under the proposed project could have the potential to directly and indirectly result in the loss of nursery sites. Because the proposed project would allow for greater density and intensity of development compared to the General Plan, impacts would be more severe than those identified in the prior EIRs and would be significant (Impact-BIO-4). Additionally, when combined with growth and development within the cumulative study area, the proposed project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and **would be cumulatively considerable** (Impact-C-BIO-3). Implementation of the General Plan policies identified in Section 2.4.2.1 and mitigation measures identified in Section 2.4.6.4, in addition to compliance with applicable regulations, would reduce impacts on nursery sites but not below a level of significance for the reasons described above. Therefore, these impacts would be **significant and unavoidable**.

2.4.7.5 Issue 5: Conflict with Local Policies and Ordinances

Implementation of the proposed project would not conflict with any local policies or ordinances that protect biological resources, and project-level impacts would be **less than significant**. Additionally, the proposed project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively considerable**. The proposed project impacts would be equivalent or less severe than those analyzed by the prior EIRs which were less than significant, and no new or more severe impacts would occur.

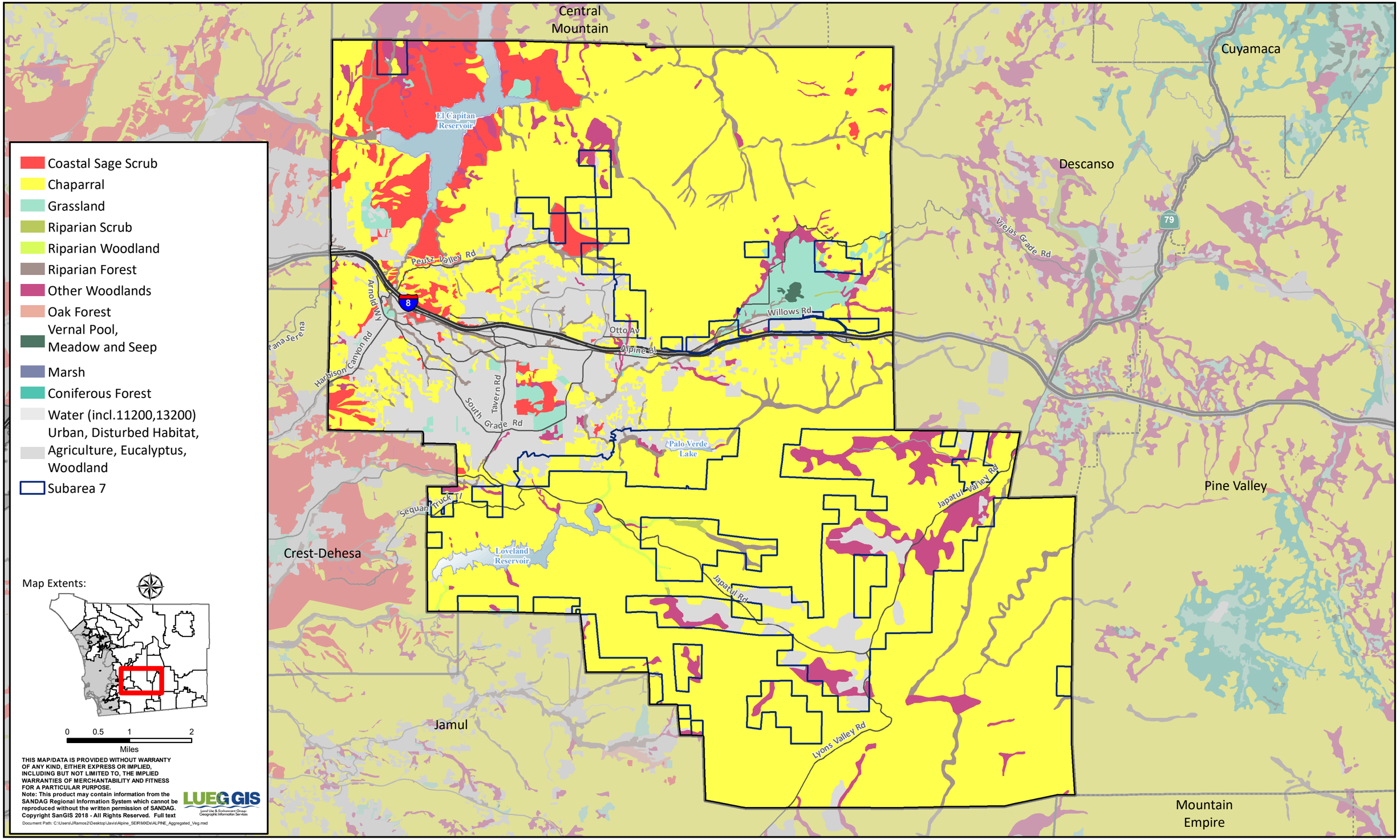
2.4.7.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

Implementation of the proposed project would not conflict with any HCP or NCCPs, and project-level impacts would be **less than significant**. Additionally, the proposed project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively considerable**. The proposed project impacts would be equivalent or less severe than those analyzed by the prior EIRs, which were less than significant, and no new or more severe impacts would occur.



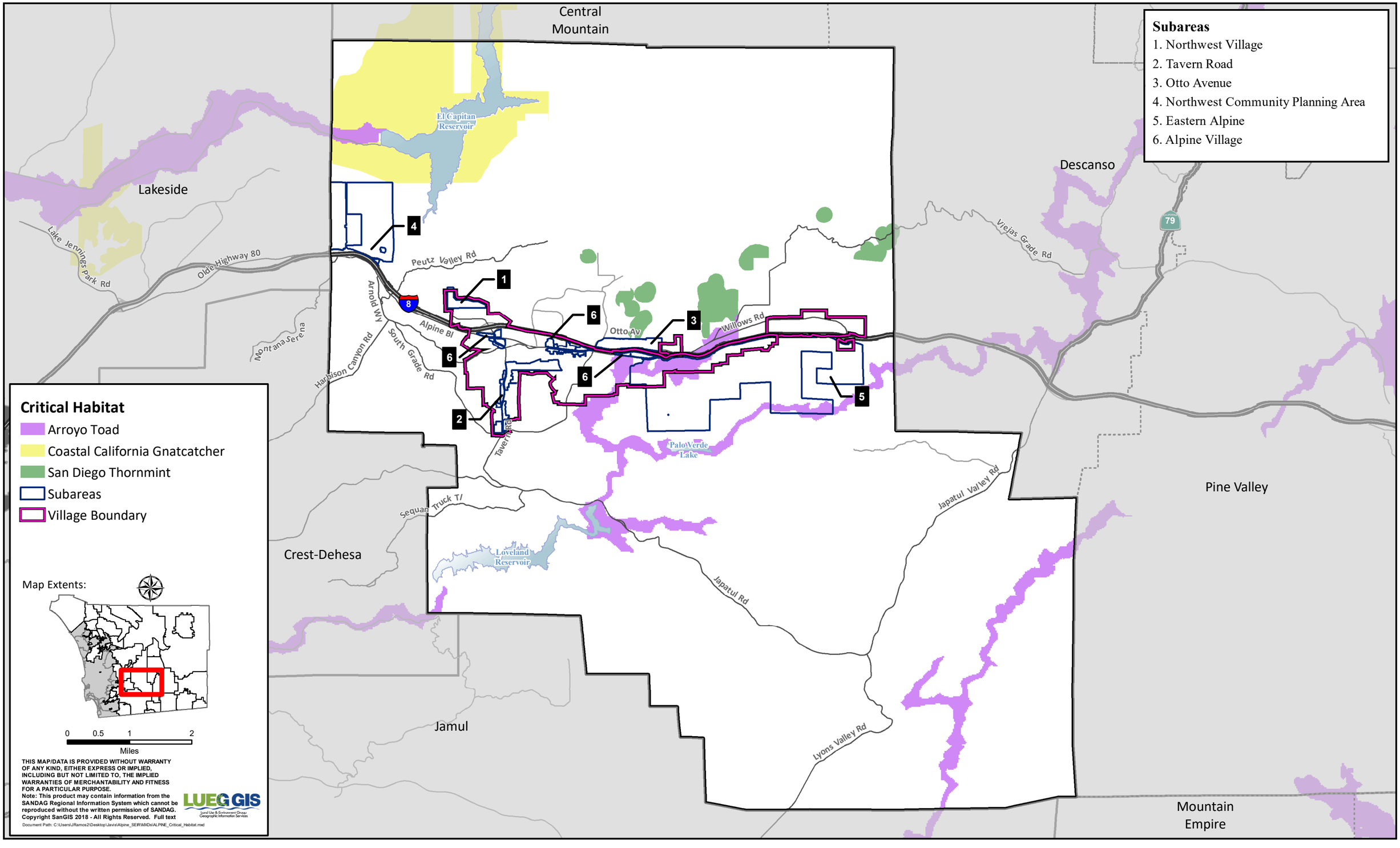
Source: SanGIS, County of San Diego, 2020

Figure 2.4-1a
Existing Aggregated Vegetation Communities in the Alpine Subareas 1-6



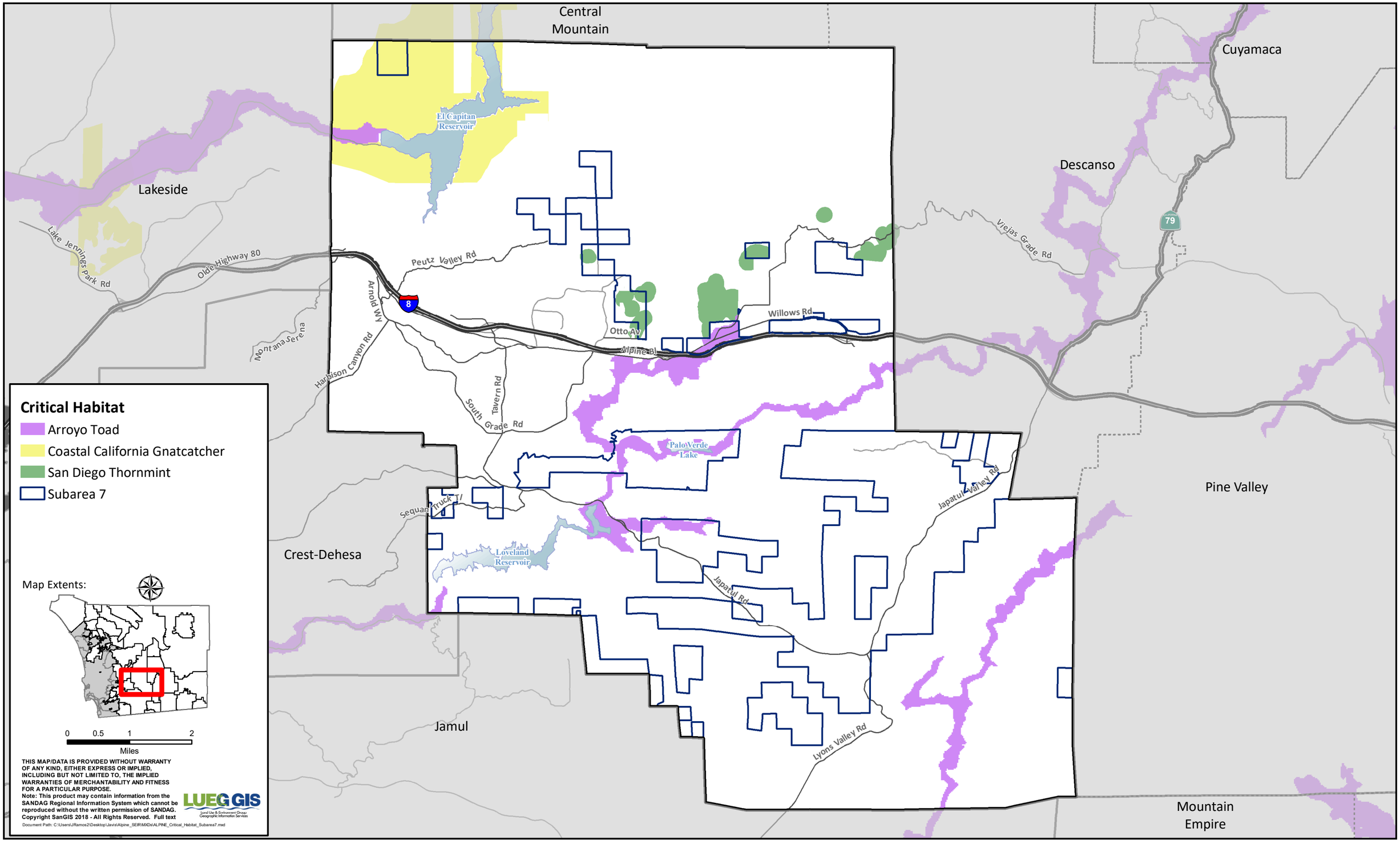
Source: SanGIS, County of San Diego, 2020

Figure 2.4-1b
Existing Aggregated Vegetation Communities in the Alpine Subarea 7



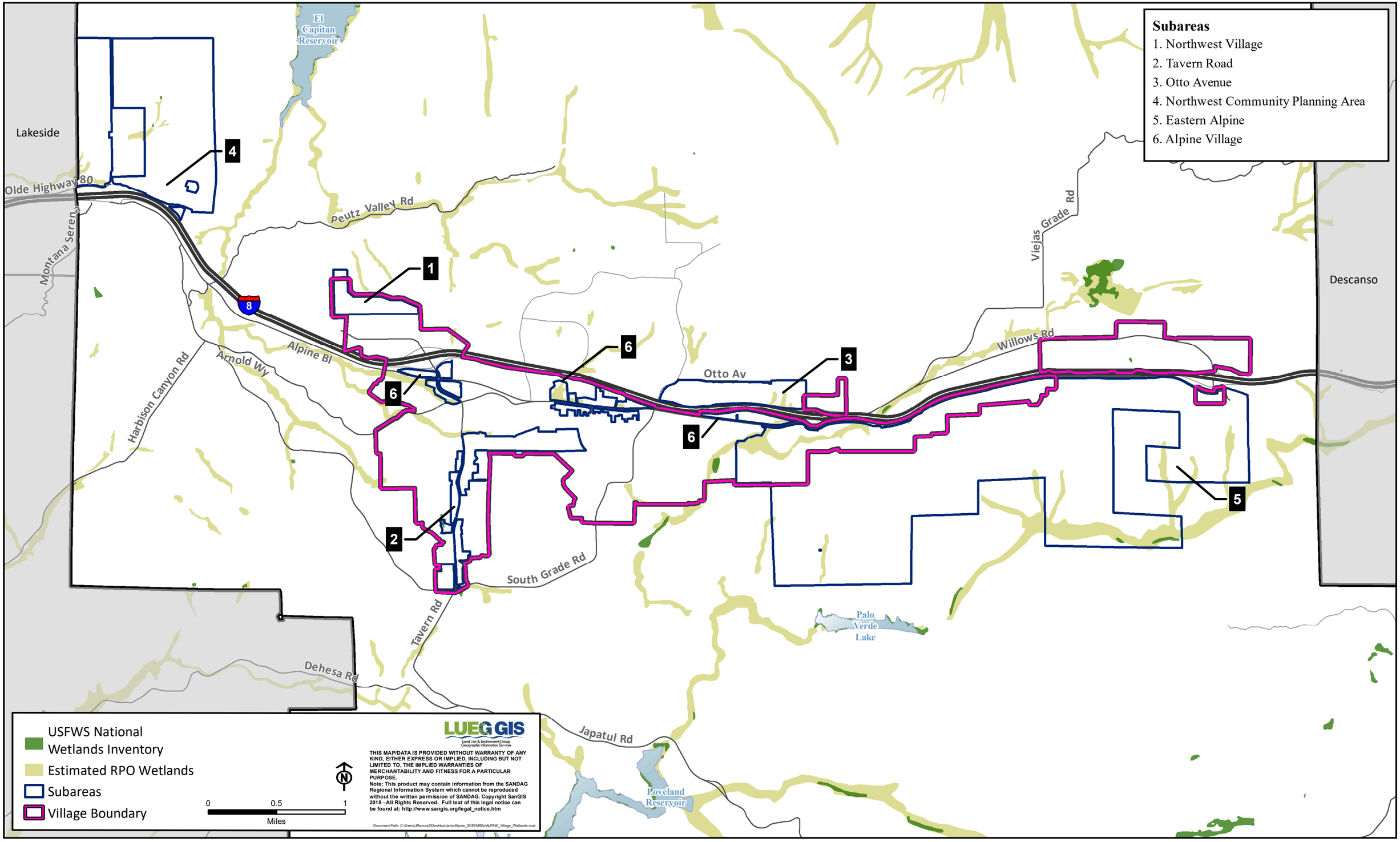
Source: SanGIS, County of San Diego, 2019

Figure 2.4-2a
Critical Habitat
Subareas 1-6



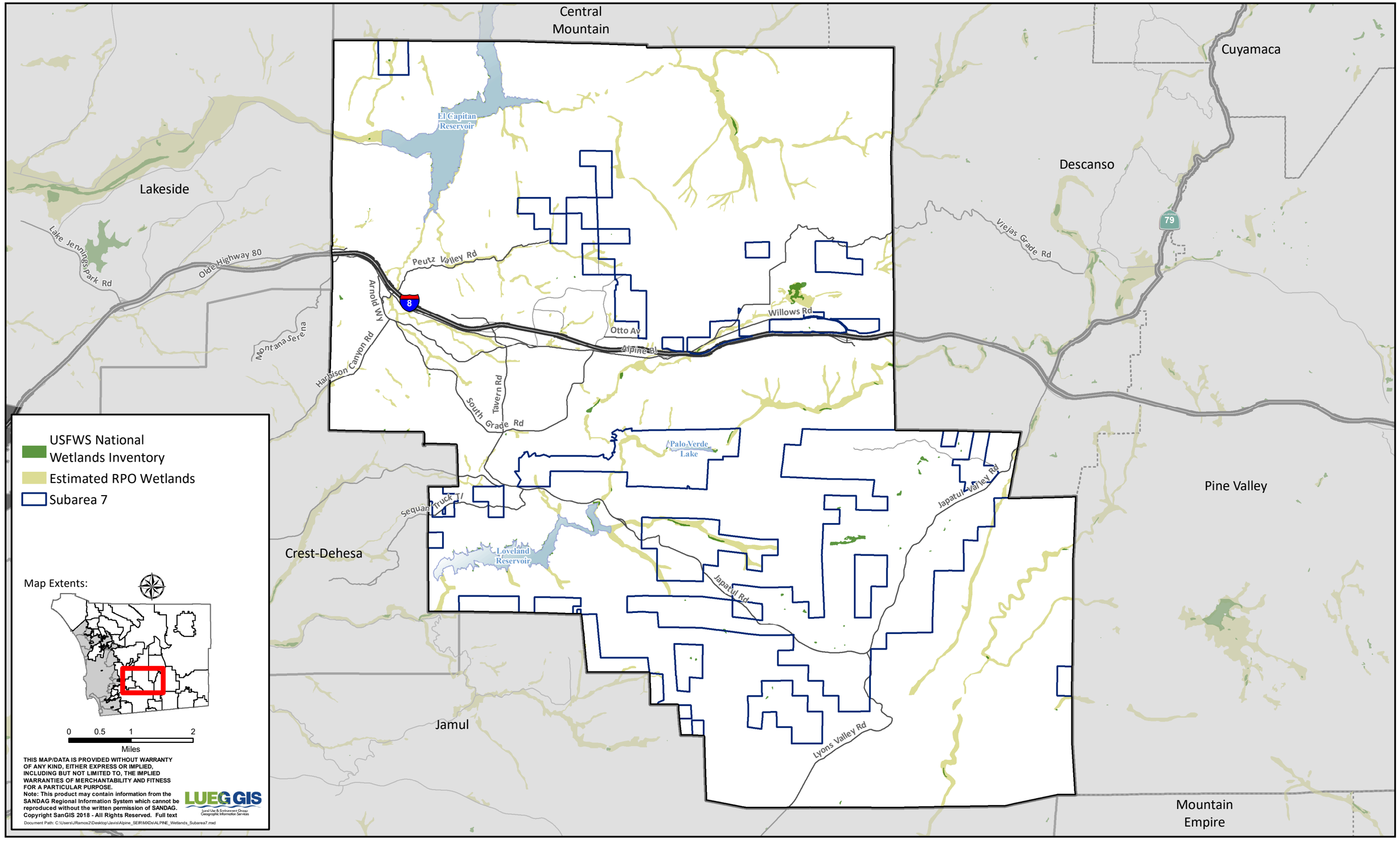
Source: SanGIS, County of San Diego, 2019

Figure 2.4-2b
Critical Habitat
Subarea 7



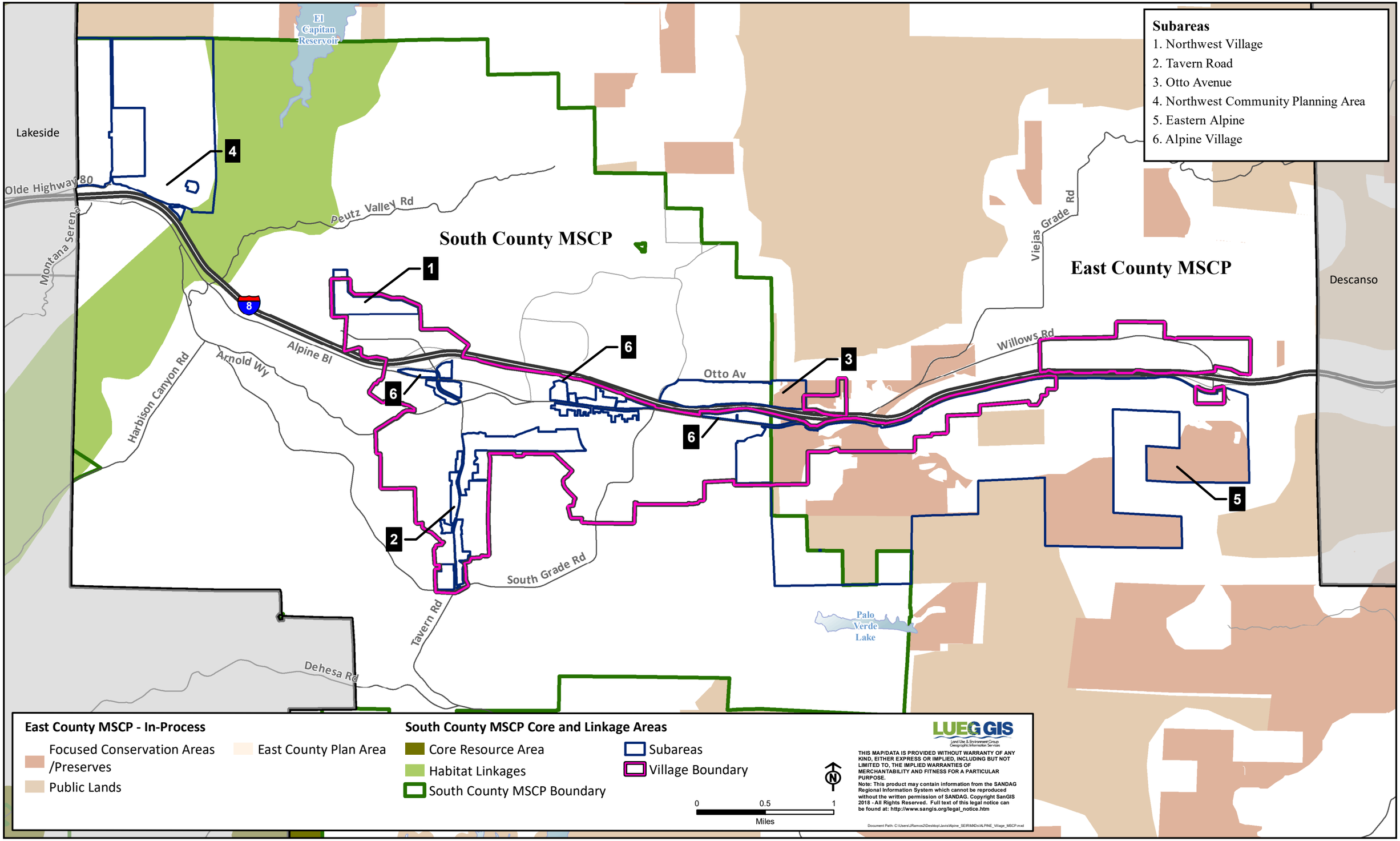
Source: SanGIS, County of San Diego, 2020

Figure 2.4-3a
Wetlands
Subareas 1-6



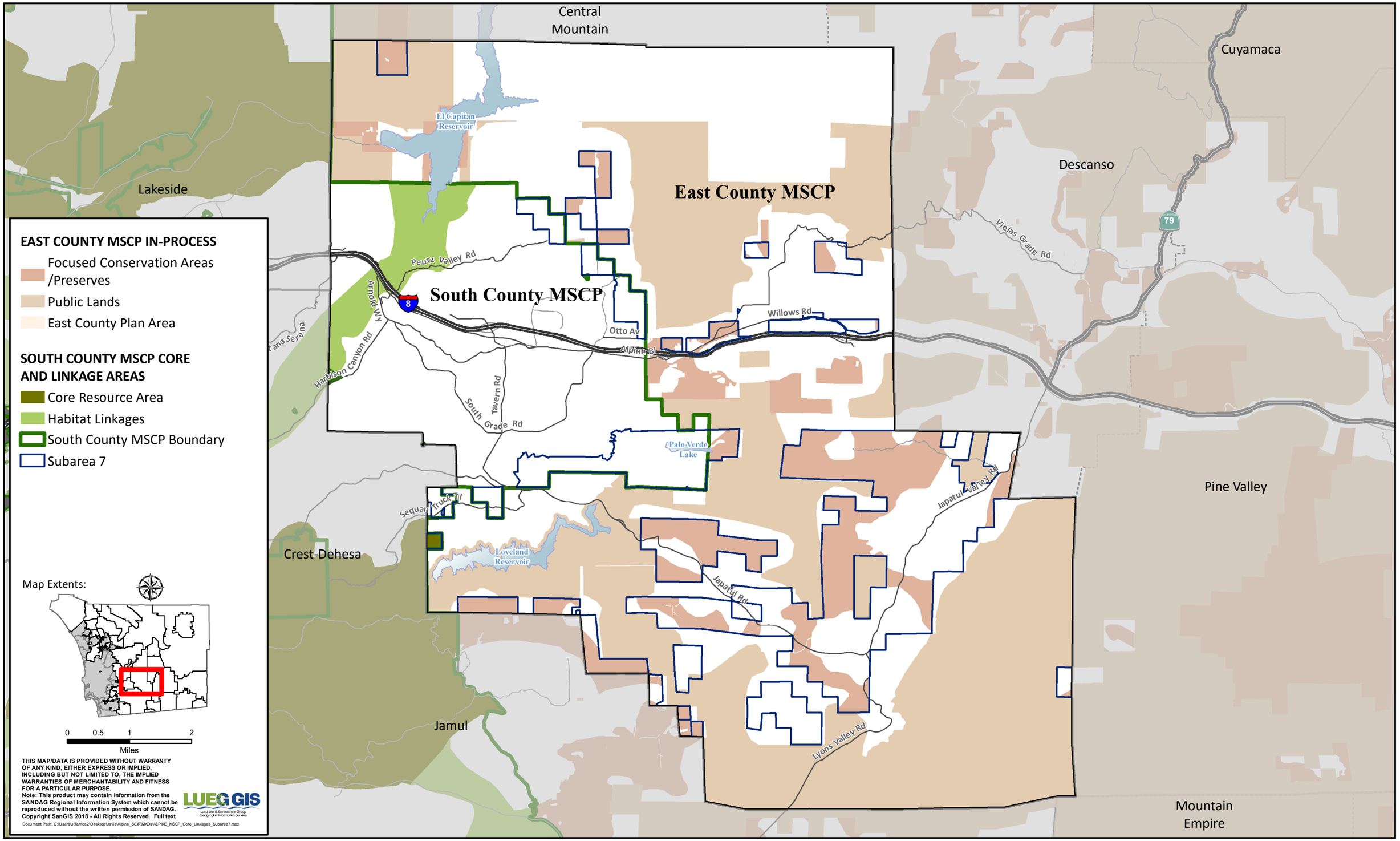
Source: SanGIS, County of San Diego, 2020

Figure 2.4-3b
Wetlands
Subarea 7



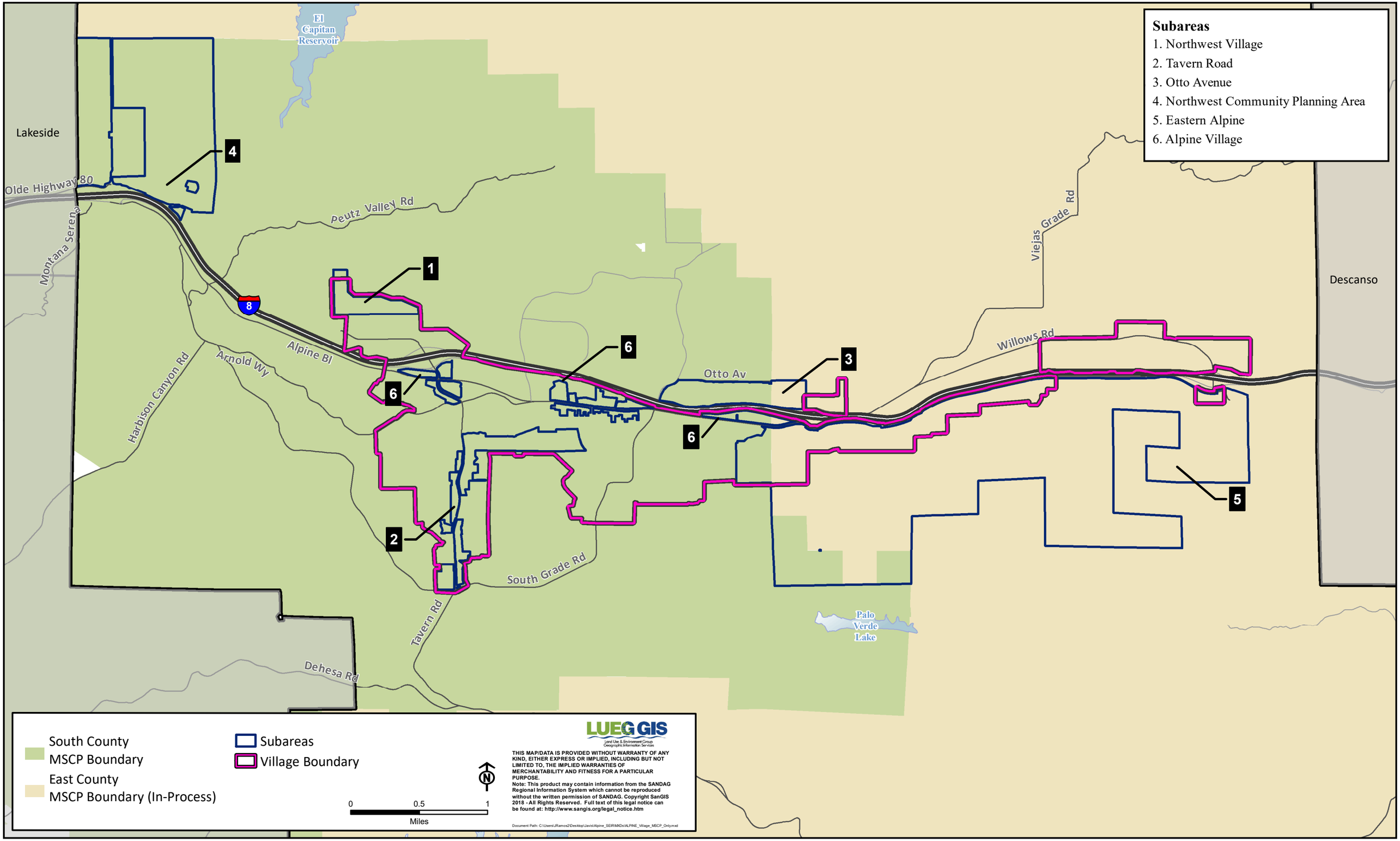
Source: SanGIS, County of San Diego, 2020

Figure 2.4-4a
Habitat Linkages
Subareas 1-6



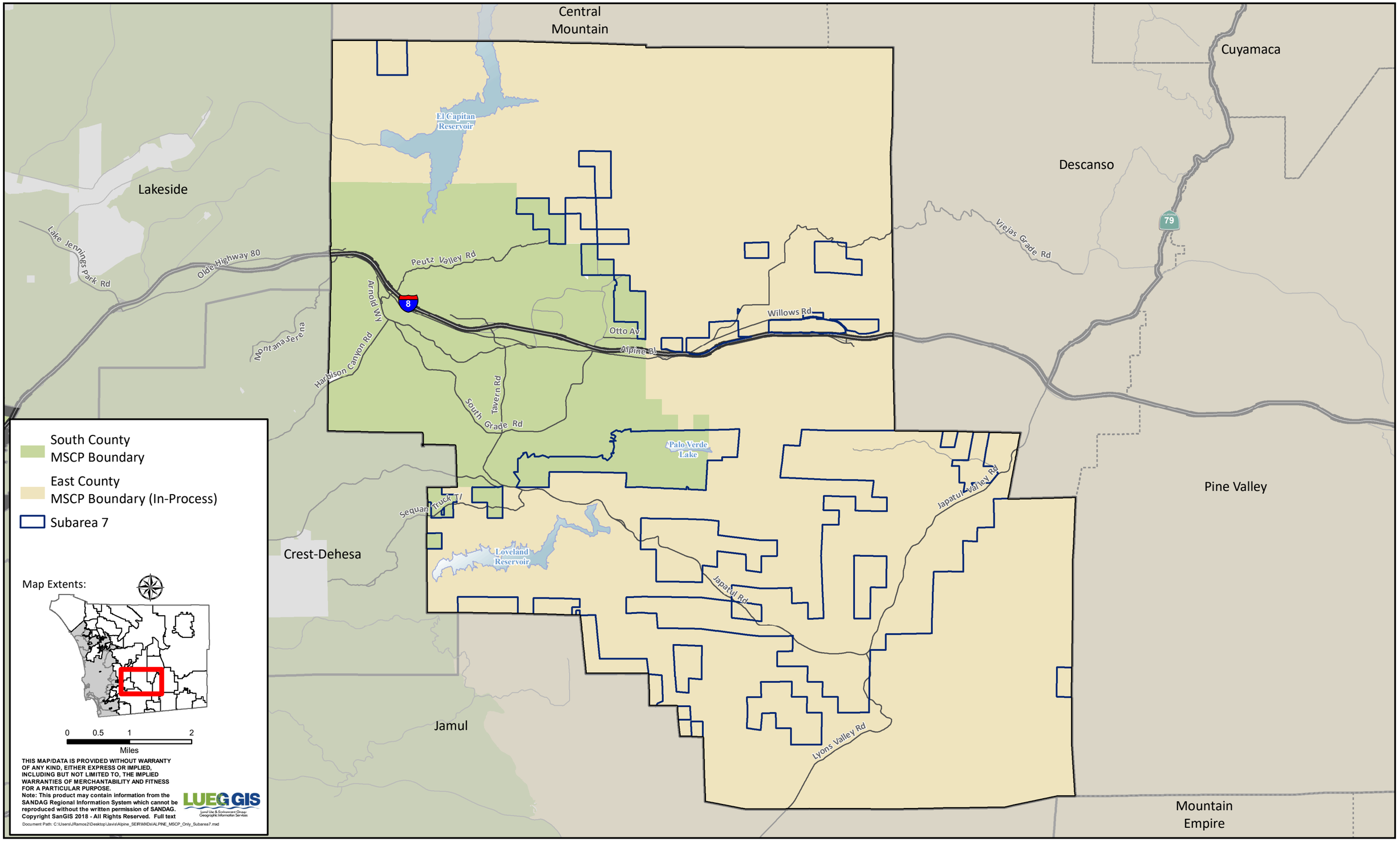
Source: SanGIS, County of San Diego, 2020

Figure 2.4-4b
Habitat Linkages
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.4-5a
Multiple Species Conservation Program (MSCP) Boundaries
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.4-5b
Multiple Species Conservation Program (MSCP) Boundaries
Subarea 7

2.5 Cultural and Paleontological Resources

This section describes the existing cultural and paleontological setting of the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on historic resources, archaeological resources, paleontological resources, and human remains. Consistent with the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative General Plan Amendment (GPA) EIR (FCI EIR), paleontological resources are analyzed in this section rather than in Geology and Soils as recommended with the recent updates to Appendix G of the State California Environmental Quality Act (CEQA) Guidelines. Geology and Soils was determined to be less than significant in the Notice of Preparation (NOP) and is included in Chapter 3.0, Other CEQA Considerations, of this Supplemental Environmental Impact Report (SEIR).

This section incorporates information and analysis from the 2011 General Plan EIR and 2016 FCI GPA EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3 (*Project Background*) of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs; however, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

This section analyzes the increase in density and change in the mobility network compared to the approved densities within the prior EIRs. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs because the type and location of cultural and paleontological resources have not changed significantly since those documents were prepared. However, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly. The prior EIRs both have similar significance statements for Cultural and Paleontological Resources.

Table 2.5-1 summarizes the impact conclusions identified in this section.

Table 2.5-1. Cultural and Paleontological Resources Summary of Impacts

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
CUL-1	Historic Resources	Less than Significant	Potentially Significant	Potentially Significant	Less than Significant
CUL-2	Archaeological Resources	Less than Significant	Potentially Significant	Potentially Significant	Less than Significant
CUL-3	Paleontological Resources	Less than Significant	Potentially Significant	Potentially Significant	Less than Significant
CUL-4	Human Remains	Less than Significant	Potentially Significant	Potentially Significant	Less than Significant

Comments received in response to the NOP related to cultural and paleontological resources included concerns regarding the preservation of cultural resources during the Alpine Community Plan Update (CPU) planning process, tribal consultation, and impacts on sensitive cultural resources. These concerns are addressed and summarized in this section.

A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIRs as it applies to the Alpine CPU (proposed project).

2.5.1 Existing Conditions

This section describes the existing cultural and paleontological setting of the Alpine CPA. Section 2.5.1 of the prior EIRs included a discussion of existing conditions related to cultural and paleontological resources in the unincorporated County. Any projects that have occurred within the Alpine CPA were required to be consistent with the development allowed by the General Plan. In addition, they would have been required to comply with all General Plan policies and mitigation measures to ensure that impacts remain less than significant. Therefore, no other changes to the existing conditions have been identified that would alter the conclusions in the prior EIRs. The discussion of existing conditions from the prior EIRs is incorporated by reference.

2.5.1.1 Cultural Setting

Cultural resources, which include both archaeological and historical resources, are found throughout San Diego County and are reminders of the County's prehistoric and historic past. Archaeological and historical resources are the remains left by the people who made and used them and may include gathering areas, landmarks, significant historical buildings and ethnographic locations, as well as physical artifacts. Archaeological resources include prehistoric and historic artifacts and features, and historic resources refer to the built environment 50 years or older. These resources can provide clues to prehistoric and historic human behaviors and provide scientific, religious, and other valuable educational information about the cultural past.

Archaeological Resources

Archaeological evidence suggests that San Diego County has an extensive cultural history beginning approximately 10,000 years ago. The County also acknowledges that other perspectives exist regarding the history of San Diego County. The Native American perspective, which is supported by creation stories, is that humans have inhabited this region from the beginning and that there has been a continuum of ancestry from the first people to the present Native American populations of San Diego County (County of San Diego 2007a). A detailed outline of the early history of San Diego County, including the Alpine CPA, can be found in Section 2.5 of the prior EIRs. Many prehistoric habitation and smaller resource gathering and processing sites have been recorded within the Alpine CPA. Information about these sites is kept confidential to protect these resources from destruction or theft.

Historic Resources

Historic resources are related to the introduction of Mexican and American settlers to the Alpine CPA. The entire CPA was reclaimed from Spanish missions and given as a land grant to brothers Ramon and Leandro Osuna by Governor José Figueroa in 1846 under the name Rancho Valle de las Viejas y Mesa del Arroz (Bean and Rawls 2003). After the Mexican-American War in 1848 and the establishment of the Land Commission in 1851, the Alpine area became part of a smaller tract deeded to Don José Antonio Aguirre, whose family held the property until the 1860s (Alpine Historical Society 2019). After the 1860s, J.S. Harbison established the first commercial apiary operation in San Diego County in the Harbison Canyon area of Alpine, and ex-Confederate veterans Joseph Harden, Adam Beaty, and Royal Barton established small ranches in the Alpine area (La Force 1971). It was during this time that the nucleus of the Village began to form around the Viejas stage stop (Alpine Historical Society 2019).

Alpine was named after George and Nellie Webb's Alpine Ranch, which was established in the early 1870s. George Webb established the San Diego-Julian Toll Road in 1871 as an alternative to the Julian Banner Toll Road and this helped to establish the community permanently. However, much of the area was barred to settlement due to a legal dispute with the Texas Pacific Railroad, which laid claim to the area before an agreement was reached in 1885. This changed during the "Boom of the Eighties," which was sparked by the completion of the Santa Fe railroad line to National City, and numerous town sites were laid out throughout San Diego County during this time (Dumke 1944), including Alpine. Pioneer families established farms, orchards, and ranches; their surplus was transported by wagon for sale in markets throughout San Diego.

No records search was conducted for the proposed project, but a review of the County of San Diego Historical Property Listing shows that two resources, the Julian Eltinge Residence and the Alpine Woman's Club/Alpine Town Hall building, were brought before the County's Historical Site Board, recommended for listing in the Local Register of Historical Resources, and approved by Planning & Development Services. Neither of these historical resources is located within the Alpine CPU subareas, but they are described and analyzed to evaluate whether they may be impacted by the proposed project (Figures 2.5-1a and 2.5-1b). A third resource, the Alpine Tobacco Company, is a qualified historic unreinforced building and the property owner has not applied for historic designation. Several other structures throughout the community are likely eligible for listing in the Local Register. However, to date, no comprehensive historical resources inventory that identifies these resources has been completed.

Julian Eltinge Residence (Sierra Vista Rancho), 2690 South Grade Road

The Julian Eltinge Residence was built by William Dalton, a star of stage and screen from the early 1900s until his death in 1941. Dalton was a female impersonator known worldwide for his stage persona Julian Eltinge. Dalton appeared in numerous plays, vaudeville shows, and later motion pictures as Julian. Dalton moved to Alpine in 1923 and bought a large parcel with the intention of creating a resort that would attract fellow artists. He built a home with two additional cottages, a swimming pool, and outbuildings. However, his popularity waned as a performer, and his plans for building the resort never materialized. Dalton used his Alpine home as his primary residence from 1930 until his death in 1941. The home he built still stands and was added to the Local Register of Historical Resources on August 30, 2005, for its association with William Dalton (significant individual).

Alpine Woman's Club, 2156 Alpine Boulevard

Originally built as the Alpine Town Hall in 1899, the Alpine Woman's Club building has housed the Alpine Woman's Club since 1914. The creed of the Club "is to promote a spirit of community cooperation and to engage in all manner of charitable, social, educational and recreational endeavors conducive to the public welfare." In 1932, the Club acquired the building and built a comfort station for travelers. The building was also used as an unofficial welcoming center for the community. The Club still owns the building and uses it for its meetings. The building was added to the Local Register of Historical Resources on November 9, 2006.

2.5.1.2 Paleontological Setting

As described by the prior EIRs, paleontological resources are the traces and remains of prehistoric life (exclusive of human remains, artifacts, or features) which may be defined as fossils. Paleontological resources include the localities where the fossils are collected and the rock formations in which they were formed. Fossils are the result of the preservation of organic remains through a complex interaction between physical and biological factors. Fossil remains commonly include marine shells; bones and teeth

of fish, reptiles, and mammals; leaf assemblages; and petrified wood. Trace fossils include internal and external molds and casts and provide evidence for the past activities of fossil organisms such as footprints and trackways, burrows and boreholes, coprolites, nests, and (packrat) middens. The discussion of paleontological background from the prior EIRs is incorporated by reference.

Paleontological Resources

Alpine is located within the Peninsular Ranges Region, which is between the foothills of Cowles Mountain and Bernardo Mountain on the west and In-Ko-Pah Gorge and Palomar Mountain on the east. As detailed in the prior EIRs, this region is primarily underlain by plutonic igneous rocks with some sedimentary rock units in Quaternary alluvial and alluvial fan deposits and Quaternary peat deposits in the mountain valleys.

Sensitivity levels are rated for individual geologic formations, and the sensitivity level of the geologic formation is the same as the resource's potential ratings, as it is the formation that contains the fossil remains. The majority of the Alpine CPA has zero potential for paleontological resources, but there are places where the sensitivity is low, marginal, or moderate (see Figures 2.5-2a and 2b). As detailed in the prior EIRs, formations with low sensitivity are those unlikely to produce unique fossil remains. However, when paleontological resources are found in such formations, they are often significant additions to the geologic understanding of the area. No subareas contain formations of low sensitivity, but there are places within the Alpine CPA that have a low potential for producing unique fossil remains. Marginally sensitive formations are composed of either volcaniclastic or metasedimentary rocks, which have a limited probability for producing fossils, and although marginally sensitive formations are present in the southwestern portion of the Alpine CPA, they are not present in any of the subareas for the proposed project. Moderately sensitive formations are considered to have a strong, but often unproven, potential for producing unique fossil remains. Subarea 2 is the only subarea with moderately sensitive geologic formations.

Alpine also contains unique geological resources. A geologic unit or feature is unique if it is the best example of its kind locally or regionally, embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally, provides important geological information including geologic history, is a type locality of a geologic feature, contains a mineral not known to occur elsewhere in the San Diego County, is used repeatedly as a teaching tool, or is otherwise identified as unique by the County's Guidelines for Determining Significance – Unique Geology (County of San Diego 2007b). The majority of the Alpine CPA has low potential for unique geological resources. However, certain regions of the Alpine CPA, particularly in the northwest, north-central, and southeast portions of the CPA, have the potential for containing unique resources (see Figures 2.5-3a through 2.5-3c). Figure 2.5-3a identifies that unique geology is present adjacent to Subarea 4 (moderate sensitivity) and Figure 2.5-3b identifies that unique geology within Subarea 7 (moderate and high sensitivity).

These conditions are the same as those analyzed in the prior EIRs and no conditions have been identified in the Alpine region that would change the conclusions reached by the prior EIRs.

2.5.2 Regulatory Framework

Section 2.5.2 of the prior EIRs included a discussion of the Regulatory Framework related to cultural resources in the unincorporated County, including the Alpine CPA, which is hereby incorporated by reference. The regulations described in the prior EIRs that were applicable to the entire County have not changed since adoption, with the exception of the addition of the federal Paleontological Resources

Preservation Act of 2002 and California Assembly Bill 52 (AB-52), which were not included in the prior EIRs.

The regulations described in the prior EIRs have not changed and will not be repeated here but are listed below for reference. No changes have been made to any of the regulations mentioned in the prior EIRs that would alter the conclusions from the prior EIRs. A summary of the new regulations, the Paleontological Resources Preservation Act and AB-52, are provided below.

Applicable federal regulations include:

- Executive Order 12072
- Historical Sites, Buildings, Objects, and Antiquities Act
- National Historical Landmarks Program
- National Historical Preservation Act Section 106
- National Register of Historic Places (NRHP)
- Native American Graves Protection and Repatriation Act (NAGPRA)
- The Secretary of the Interior's Standards.

Applicable state regulations include:

- State Historical Landmarks Program
- State Points of Historical Interest Program
- California Register of Historical Resources (CRHR)
- California Native American Graves Protection and Repatriation Act (Cal NAGPRA)
- Public Resources Code (PRC) (Sections 5079–5079.65, 5097-5097.6, and 5097–5097.991)
- Government Code (Sections 25373, 27288.2, and 50280–50290 – Mills Act)
- Health and Safety Code (HSC) (Sections 18950–18961 and 7050.5)
- Penal Code Section 622
- Senate Bill (SB-18).

Applicable local regulations include:

- County of San Diego Code of Regulatory Ordinances Sections 87.101-87.804, Grading Clearing, and Watercourse Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608, Resource Protection Ordinance (RPO)
- County Zoning Ordinance
- Resource Conservation Areas
- County of San Diego Local Register of Historical Resources
- County of San Diego Historical Site Board.

Applicable regulations not included in or adopted after adoption of the prior EIRs are described below.

2.5.2.1 Paleontological Resources Preservation Act of 2002

The federal Paleontological Resources Preservation Act of 2002 was enacted to codify the generally accepted practice of limiting the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers; these researchers must obtain a permit from the appropriate state or

federal agency and agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers.

2.5.2.2 Assembly Bill 52 (AB-52)

AB-52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (PRC Section 21084.2).

PRC Section 21074 defines tribal cultural resources as follows.

- Sites, features, places, sacred places, and objects with cultural value to descendant communities or cultural landscapes defined in size and scope that are:
    - Included in or eligible for listing in the CRHR; or,
    - Included in a local register of historical resources.

- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and non-unique archaeological resources, as defined in PRC Section 21083.2, can be tribal cultural resources if they meet the criteria detailed above. The lead agency relies upon substantial evidence to make the determination that a resource qualifies as a tribal cultural resource when it is not already listed in the CRHR or a local register of historical resources.

AB-52 defines a "California Native American Tribe" (Tribe) as a Native American Tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC) (PRC Section 21073). Under AB-52, formal consultation with Tribes is required prior to determining the level of environmental document if a Tribe has requested to be informed by the lead agency of proposed projects and if the Tribe, upon receiving notice of the project, accepts the opportunity to consult within 30 days of receipt of the notice. AB-52 also requires that consultation, if initiated, address project alternatives and mitigation measures for significant effects, if specifically requested by the Tribe. AB-52 states that consultation is considered concluded when either the parties agree to measures to mitigate or avoid a significant effect on tribal cultural resources, or when either the Tribe or the agency concludes that mutual agreement cannot be reached after making a reasonable, good-faith effort. Under AB-52, any mitigation measures recommended by the agency or agreed upon with the Tribe may be included in the final environmental document and in the adopted mitigation monitoring program if they were determined to avoid or lessen a significant impact on a tribal cultural resource. If the recommended measures are not included in the final environmental document, then the lead agency must consider the four mitigation methods described in PRC Section 21084.3(b):

- Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.

- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Protecting the resource.

Any information submitted by a Tribe during the consultation process is considered confidential and is not subject to public review or disclosure. It will be published in a confidential appendix to the environmental document unless the Tribe consents to disclosure of all or some of the information to the public.

2.5.2.3 County of San Diego General Plan Policies

The General Plan includes goals and policies intended to protect historic resources, archaeological resources, paleontological resources, and human remains within the Conservation and Open Space Element.

Conservation and Open Space Element

Goal COS-7 is to protect and preserve San Diego County's important archaeological resources for their cultural importance to local communities and their research and educational value. Policies COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, and COS-7.6 support this goal by describing how archaeological resources should be managed. Policy COS-7.1 requires development to include appropriate mitigation to protect the quantity and integrity of important archaeological resources. Policy COS-7.2 requires development to avoid archaeological resources whenever possible and, where this is not possible, requires development to fully mitigate any impacts to these resources. Policy COS-7.3 requires that archaeological collections be treated and preserved in a culturally appropriate manner, and policies COS-7.4 and COS-7.6 require consultation with agencies and affected communities, including local tribes, to determine the appropriate treatment of cultural resources. Policy COS-7.5 requires that human remains be treated with dignity and respect, and that any necessary handling of human remains be done in consultation with the Most Likely Descendant (MLD) and according to the requirements of federal, state, and local regulations.

Goal COS-8 identifies the importance of protecting, conserving, using, and enjoying San Diego County's important historical resources. Policy COS-8.1 supports this goal by encouraging the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources identified during both discretionary and ministerial permitting processes.

Goal COS-9 requires that paleontological resources and unique geological features be conserved for educational and scientific purposes. This is supported by policy COS-9.1, which requires that unique paleontological resources that may be exposed to the elements during development processes be salvaged and preserved, and policy COS-9.2 which requires development to minimize impacts to unique geological features from human-related damage, destruction, or loss.

2.5.2.4 Alpine CPU Policies

No Alpine CPU policies are directly applicable to historic resources, archaeological resources, paleontological resources, or human remains.

2.5.3 Analysis of Project Effects and Determination as to Significance

Based on Appendix G of the State CEQA Guidelines, the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources (2007a), the County's Guidelines for Determining Significance – Paleontological Resources (2009), and the County's Guidelines for Determining Significance – Unique Geology (2007b), the proposed project would result in a significant impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

2.5.3.1 Issue 1: Historical Resources

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, the proposed project would have a significant impact if it would result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or the County's RPO through physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA Guidelines Section 15064.5(b)(2).

In addition, Section 15064.5(a) of the State CEQA Guidelines defines a "historical resource" as the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR (Pub. Res. Code, Section 5024.1, Title 14 [California Code of Regulations] CCR, Section 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

   Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (Pub. Res. Code, Section 5024.1, Title 14 CCR, Section 4852 et. seq.) including the following:

   a. Criterion A: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. Examples include resources associated with the Battle of San Pasqual, gold mining in the Julian area, or a Kumeyaay settlement.

   b. Criterion B: Is associated with the lives of persons important in the past. Examples of significant resources include those associated with the lives of George W. Marston, Kate Sessions, John D. Spreckels, Ellen Browning Scripps, Ah Quin, Manuel O. Medina, Jose Manuel Polton (Hatam), or Jose Pedro Panto.

   c. Criterion C: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. Resources representing the work of architects such as William Templeton Johnson, Irving Gill, Lilian Rice, or Hazel Waterman would be considered significant because they represent the work of an important creative individual; or if a resource is identified as a Queen Anne, Mission Revival, Craftsman, Spanish Colonial, or Western Ranch Style structure, it would be significant because it embodies the distinctive characteristics of a type or period.

   d. Criterion D: Has yielded, or may be likely to yield, information important in history. For example, a historical stone dam would be significant because it is considered unique and is likely to yield information important to history.

4. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

The following definition of an historic or archaeological resource is provided in the County's RPO:

- Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
  - Formally determined eligible or listed in the NRHP by the Keeper of the National Register; or

  - To which the Historic Resource ("H" Designator) Special Area Regulations have been applied; or

- One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials; and

- Any location of past or current sacred religious or ceremonial observances which is either:
  - Protected under Public Law 95-341, the American Indian Religious Freedom Act or PRC Section 5097.9, such as burials, pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures, or
  - Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistorical or historical ethnic group.

Additional criteria for defining historical resources that apply to the identification and evaluation of cultural resources in the Alpine CPA include Section 5020.1 of the PRC and the County of San Diego Ordinance No. 9493 (Local Register of Historical Resources – County Administrative Code Section 396.7), Section V (d) (2), which are described below:

Section 5020.1 of the PRC defines a historical district as a definable unified geographic entity that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A historical landmark means any historical resource that is registered as a state historical landmark pursuant to Section 5021, and a historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript that is historically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

The County of San Diego Ordinance No. 9493, Section V (d) (2) (Types of Historical Resources and Criteria for Listing in the San Diego County Register of Historical Resources) states that one of the criteria for historical listing is: "historical resources achieving significance within the past fifty (50) years." However, the County's Significance Guidelines states that "A resource less than fifty (50) years old may be considered if it can be determined that sufficient time has passed to understand its historical importance."

Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations would result in potentially significant direct and indirect impacts on historical resources. The discussion of impacts on historical resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.1 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to result in substantial adverse changes to the significance of historical resources. In addition, implementation of the2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with historical resources. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies. The preservation and protection of historical resources is required through compliance with the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance. Furthermore, General Plan policy COS-8.1 encourages the adaptive reuse, restoration, and renovation of historical resources.

The proposed project would increase the current allowed density in three (Subareas 2, 4, and 6) of the seven subareas and expand mobility networks, and therefore has the potential to affect historical

resources within the Alpine CPA. It should be noted that the General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 6,430 dwelling units currently allowed under the General Plan to the 8,443 dwelling units that would be allowed by the Alpine CPU, an increase of 2,013 dwelling units in total.

Figures 2.5-1a and 1b identify known historic resources within the vicinity of the seven subareas within the Alpine CPA. As shown in Figures 2.5-1a and 1b, there are two known historical resources within the Alpine CPA. The Julian Eltinge Residence is located along South Grade Road, south of Subareas 2 and 6. The Alpine Woman's Club is located along Alpine Boulevard, west of Subarea 6. The proposed project would allow an increase of up to 780 units within Subarea 2 and up to 579 dwelling units within Subarea 6. As a result, the future impacts under the proposed project would be greater than those identified in the prior EIRs, and the impact would be significant to known historical resources.

Some historical resources exist within the Alpine CPA that are historically significant but have not yet been designated, and there may also be unknown historical resources within the Alpine CPA. Designated, potentially significant but undesignated, and unknown historical resources could be directly or indirectly impacted as a result of new development allowed under the proposed project. An example of a direct impact to a historical resource would be the demolition of a historical building during the development of new dwelling units. Historical resources could also be disturbed or degraded as a result of increased human activity in areas which contain historical resources.

The proposed project would allow for a greater density and increase in the number of dwelling units in Subareas 2, 4, and 6, and mobility network changes; however, Subarea 5 would have a reduction in dwelling units. Any future development projects would be subject to an environmental review process, which may include record searches, site-specific pedestrian surveys, and historical evaluations. The purpose of the review process is to identify potential historical resources and identify mitigation measures that will minimize any impacts to these resources. In addition, any future projects in the Alpine CPA will be subject to federal, state, and local regulations, and must conform to the goals and policies established in the General Plan. Despite these regulations and policies, this impact is **potentially significant** because the increase in development could directly or indirectly disturb or damage historical resources within the Alpine CPA.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.5.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to protect historical resources in San Diego County that are also applicable to the Alpine CPU.

The RPO requires that cultural resources be evaluated as part of the County's discretionary environmental review process and prohibits trenching, grading, clearing and grubbing, or any other activity or use damaging to significant historical site lands, except for scientific investigation with an approved research design prepared by a certified archaeologist.

PRC Section 5097 outlines the requirements for a cultural resource analysis prior to construction on state lands, and the PRC and California Penal Code 622.5 make it a misdemeanor criminal offense to disturb or destroy historical resources without authorization.

The Mills Act program grants local governments the authority to directly implement a historical preservation program. Within the Alpine CPA, the Julian Eltinge property is identified as a Mills Act property. The County of San Diego requires all Mills Act properties to follow the Secretary of the Interior's Standards for Rehabilitation, which provide regulations for the restoration or rehabilitation of historical

structures to preserve their original or restored architectural elements and features while providing a safe building for occupants. California HSC 18950-18961 provides additional regulations regarding restoration and rehabilitation, and the Secretary of the Interior's Standards for the Treatment of Historical Properties supports the protection of historical resources by promoting consistent preservation practices.

In addition, policy COS-8.1 of the General Plan encourages future developers to preserve and adaptively reuse historical sites where appropriate, which could reduce the potential for future development to cause a substantial adverse change in the significance of a historical resource. The prior EIRs also identified several mitigation measures addressing impacts related to historical resources that would be applicable to the proposed project, including Cul-1.1 through Cul-1.8, which are provided in Section 2.5.6, *Mitigation*, below.

Summary

The proposed project increases the permitted densities within the CPA, which may impact historical sites within the Alpine CPA such as the Julian Eltinge Residence and the Alpine Woman's Club. Future development projects implemented under the proposed project may also impact identified but undesignated and unknown historical resources within the Alpine CPA. Future projects would be required to comply with the numerous regulations established to protect historical resources, and any historical resources identified during the preparation of discretionary permits would be evaluated according to the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources. Despite these regulations and policies, impacts to historical resources would be **potentially significant,** and mitigation would be required **(Impact-CUL-1).**

2.5.3.2 Issue 2: Archaeological Resources

Guidelines for the Determination of Significance Analysis

Significant cultural resources are non-renewable and therefore cannot be replaced. The disturbance or alteration of a cultural resource causes an irreversible loss of significant information. The proposed project would have a potentially significant impact if it would cause a substantial adverse change in the significance of an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a), County Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, and the criteria provided below. This includes the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.

PRC Section 21083.2 defines a unique archaeological resource as an archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Under the State CEQA Guidelines, archaeological resources may also be considered historical resources. Therefore, definitions of archaeological resources, as defined in State CEQA Guidelines Section 15064.5 and the County's RPO are the same as those provided for Issue 1.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant direct and indirect impacts on archaeological resources. The discussion of impacts to archaeological resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.34.2 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to result in a substantial adverse change in the significance of an archaeological resource, including the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with archaeological resources. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies. Specifically, General Plan policies COS-7.1 through 7.4, and 7.6 require the preservation and avoidance of archaeological resources whenever possible, appropriate treatment of archaeological resources, and consultation and coordination with agencies and local tribal governments. Furthermore, the preservation and protection of archaeological resources is required through compliance with the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance.

The proposed project would allow for increased dwelling units in Subareas 2, 4, and 6, amounting to a potential increase of 2,013 dwelling units in the Alpine CPA. Additionally, proposed mobility network changes associated with the proposed project would allow roadway reclassifications, reconfigurations, and new roadways. Both the increase in dwelling units and mobility network changes would have the potential to impact known and unknown archaeological resources within the Alpine CPA because of the ground-disturbing activities with building dwelling units and constructing and reconfiguring roads. The increase in density could equate to greater ground disturbance. As such, these impacts would be greater because development could be more spread out. The General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 6,430 dwelling units currently allowed by the General Plan to the 8,443 units proposed in the Alpine CPU.

Because this is a programmatic analysis and the Alpine CPU is intended to serve as a long-term planning document, a records search or pedestrian survey was not completed to determine the location of existing cultural resources within the Alpine CPA. Subsequent projects seeking a discretionary permit may be subject to an environmental review process, at which point a records search would be conducted to determine whether a pedestrian survey or cultural resources evaluations would be required.

Future development projects implemented under the proposed project could directly impact significant, unevaluated, and unknown archaeological resources within the Alpine CPA, either directly or indirectly. Ground-disturbing activities such as clearing, excavation, trenching, and grading associated with the construction of structures and infrastructure have the potential to damage or destroy archaeological resources that may be present on or below the ground surface, particularly in areas that have not previously been developed. Indirect impacts to archaeological resources may also occur as a result of land development activities that increase erosion, dust, or accessibility to a surface or subsurface archaeological resource, possibly increasing the degradation of the resource. Implementation of the proposed project would also result in the exposure of resources to increased human activity and may lead

to human encroachment onto archaeological sites or a decrease in the integrity of archaeological resources.

The proposed changes associated with the proposed project have the potential to adversely directly and indirectly impact known and unknown archaeological resources in the Alpine CPA. Damage to archaeological resources may result in the loss of valuable information from a resource or prevent a potentially eligible site from being listed in the federal, state, or local historical registers, which would be considered a significant impact to the archaeological resource. Any future development would be subject to an environmental review process and federal, state, and local regulations that protect archaeological resources. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development could still adversely impact archaeological resources in the Alpine CPA to a degree greater than was analyzed by the prior EIRs. As such, this impact is **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.5.2, *Regulatory Framework*, numerous federal, state, and local regulations are in place to protect archaeological resources in San Diego County that are also applicable to the proposed project. All projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to archaeological resources, such as PRC Section 5097, and the RPO.

PRC Section 5097 outlines the requirements for cultural resource analysis prior to construction on state lands and prohibits severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except with a clear and convincing showing that the public interest and necessity require it. California Penal Code Section 622.5 makes it a misdemeanor criminal offense to disturb or remove archaeological resources without authorization.

The RPO prohibits trenching, grading, clearing and grubbing, or any other activity or use damaging to significant archaeological site lands, except for scientific investigation with an approved research design prepared by a certified archaeologist. It also requires that cultural resources be evaluated as part of the County's discretionary environmental review process.

The General Plan also includes several policies within the Conservation Element that would reduce the potential for the proposed project to cause a substantial adverse change in the significance of an archaeological resource. Policies COS-7.1 through COS-7.4, which are presented in Section 2.5.2, require the preservation and avoidance of archaeological resources whenever possible, appropriate treatment of archaeological resources, and consultation with affected communities. Additionally, the prior EIRs identified several mitigation measures addressing impacts related to archaeological resources that would be applicable to the proposed project, including Cul-2.1 through Cul-2.6, which are provided in Section 2.5.6 of this document.

In addition to these regulations and policies, all discretionary approvals are also subject to CEQA, which requires consideration of potential impacts on archaeological resources. The County employs several cultural specialists who review projects and access local and regional databases to determine whether further study is necessary. Because of the potential presence of unknown archaeological resources, pedestrian surveys and cultural studies may be required in addition to these records searches, particularly where a project site had not been previously surveyed.

Summary

The proposed project increases the permitted densities within the CPA, which may impact known and unknown archaeological sites within the Alpine CPA. As a result, future projects implemented under the proposed project may indirectly or directly impact archaeological resources. The Alpine CPU does not include any goals or policies that are related to archaeological resources, but the General Plan includes several policies (COS-7.1 through COS-7.6) which are designed to protect archaeological resources. Other federal, state, and local regulations also protect archaeological resources, and the environmental review process is designed to avoid impacts to archaeological resources. However, because the proposed project allows increased construction of dwelling units and infrastructure, and because many archaeological resources within the Alpine CPA may be unknown or unevaluated, impacts would be greater than those analyzed in the prior EIRs. Therefore, the impacts to archaeological resources would be **potentially significant,** and mitigation is required **(Impact-CUL-2).**

2.5.3.3 Issue 3: Paleontological Resources

Guidelines for the Determination of Significance Analysis

Geologic deposits containing fossils of extinct organisms are limited and non-renewable. According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature.

According to the County's Guidelines for Determining Significance - Paleontological Resources, a unique paleontological resource is any fossil or assemblage of fossils, paleontological resource site, or formation that meets any one of the following criteria:

- Is the best example of its kind locally or regionally
- Illustrates a paleontological or evolutionary principle (e.g., faunal succession)
- Provides a critical piece of paleobiological data (illustrates a portion of geologic history or provides evolutionary, paleoclimatic, paleoecological, paleoenvironmental or biochronological data)
- Encompasses any part of a "type locality" of a fossil or formation
- Contains a unique or particularly unusual assemblage of fossils
- Occupies a unique position stratigraphically within a formation
- Occupies a unique position, proximally, distally or laterally within a formation's extent or distribution.

The County's Guidelines for Determining Significance – Unique Geology identifies unique geology as a geological unit or feature that that meets any one of the following criteria:

- Is the best example of its kind locally or regionally
- Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally
- Provides a key piece of geologic information important in geology or geologic history
- Is a "type locality" of a geologic feature

- Is a geologic formation that is exclusive locally or regionally
- Contains a mineral that is not known to occur elsewhere in the County, or
- Is used repeatedly as a teaching tool.

Impact Analysis

The prior EIRs determined that the proposed land use designations, mobility network changes, and future development would result in potentially significant direct and indirect impacts to paleontological resources. The discussion of impacts on paleontological resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.3 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs determined that the proposed land use designations, mobility network changes, and future development would result in less than significant direct and indirect impacts to unique geology. The discussion of impacts on unique geology from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.6.3.6 and 3.2 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA and subsequent projects would have the potential to directly or indirectly destroy a unique paleontological resource or site. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts to paleontological resources. Impacts were determined by the prior EIRs to be less than significant with implementation of mitigation measures and General Plan policies. The General Plan includes one goal, COS-9, which requires that paleontological resources and unique geological features be conserved for educational and scientific purposes. Policy COS-9.1 supports this goal by requiring the salvage and preservation of unique paleontological resources that are exposed by excavation, grading activities, or other developmental practices.

Two major components of the proposed project are the increased density of dwelling units and the expansion or reconfiguration of existing roadways in the Alpine CPA. Impacts to paleontological resources generally occur as a result of the physical destruction of fossil remains by excavation or trenching activities that require cutting into the underlying geologic formations. The increase in density could equate to greater ground disturbance. As such, construction activities resulting from implementation of the proposed project could potentially damage or destroy fossils in the underlying rock units. The analysis below focuses on what the change to the environment would be when the allowed number of dwelling units is increased by 2,013 under the proposed project.

Figures 2.5-2a and 2b identifies regions of the Alpine CPA that are sensitive for paleontological resources. Only Subarea 2 has a moderate sensitivity for producing paleontological resources; the other subareas have no sensitivity for producing unique paleontological resources. As discussed in Section 2.5.1.2, geologic formations with low, marginal, and moderate potential for paleontological resources are relatively unlikely to produce unique paleontological resources. However, paleontological resources can be encountered in these formations and, when they are, they are likely to be significant. Therefore, ground-disturbing activities in regions with low, marginal, or moderate sensitivity have the potential to damage or destroy paleontological resources that may be present below the ground surface. Because Subarea 2 would be permitted to have more dwelling units under the proposed project, the proposed project represents a more significant impact to paleontological resources than was identified and analyzed in the prior EIRs.

The proposed project would have moderate and high sensitivity for the presence of unique geology. Moderate sensitivity is identified adjacent to Subarea 4 and within Subarea 7 (see Figures 2.5-3a, 3b, and 3c). High sensitivity for unique geology is identified in the western portion of Subarea 7 (south of Interstate 8 bisecting Japatul Road). Ground-disturbing activities in regions with moderate or high sensitivity have the potential to damage or destroy unique geology. Because Subarea 4 would be permitted to have more dwelling units under the proposed project, the proposed project represents a more significant impact to paleontological resources than was identified and analyzed in the prior EIRs.

Unknown paleontological resources have the potential to occur within the Alpine CPA, especially in the more sensitive areas of Subarea 2, where the permitted number of dwelling units would increase. These unknown resources could be uncovered and damaged during project construction activities such as grading, excavation, and utilities installation. Exposed and recorded paleontological resources and unique geology could also be indirectly impacted by dust and erosion associated with construction activities. Loss or alteration of paleontological resources or unique geology could result in an irreversible loss of significant information that would be obtained from these non-renewable resources, which would be considered a significant impact. As such, implementation of the proposed project has the potential to result in significant impacts on known and unknown paleontological resources and unique geology.

The proposed project would allow for an increased number of dwelling units in Subareas 2, 4, and 6, and new, expanded and reconfigured roadways. Future development of dwelling units or infrastructure in the Alpine CPA would be subject to environmental review, federal, state, and local regulations, and the General Plan. However, the impact to paleontological resources and unique geology is considered potentially significant because it could directly or indirectly impact paleontological resources and unique geology to a greater degree than was analyzed by the prior EIRs.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, state and local regulations identified in Section 2.5.2, *Regulatory Framework*, that are applicable to the Alpine CPU protect paleontological resources. These include PRC Section 5097, the County Grading and Clearing Ordinance, and CEQA.

PRC Section 5097 and California Penal Code Section 622.5 make it a misdemeanor criminal violation to disturb or remove paleontological resources without authorization.

The County Grading and Clearing Ordinance requires a paleontological monitor to be present during grading or excavation activities at the discretion of the County, mandates the suspension of grading operations upon the discovery of fossils greater than 12 inches in any dimension, and gives the County Official the authority to determine the appropriate resource recovery operations, which must be carried out prior to the County Official's authorization to resume normal grading operations.

In addition, the County General Plan includes policy COS-9.1 within the Conservation Element, which requires the preservation of exposed unique paleontological resources in order to minimize impacts on paleontological resources. The prior EIRs also identified mitigation measures Cul-3.1 and Cul-3.2, which address impacts to paleontological resources and would be applicable to the proposed project. These mitigation measures are further discussed in Section 2.5.6.

Finally, CEQA requires that discretionary projects be reviewed to determine whether they have the potential to impact paleontological resources. This review process includes a records search, and in certain cases the County staff may require the developer to implement a paleontological monitoring program pursuant to the County's Guidelines for Determining Significance - Paleontological Resources.

Summary

Increased numbers of dwelling units and roadway expansions and reconfigurations implemented under the proposed project may impact paleontological resources, including unique geology, in the Alpine CPA. Certain regions of the Alpine CPA have a higher potential for the presence of paleontological resources (Subarea 2) or unique geology (Subarea 7); as such, there may be more impacts with implementation of the proposed project. While the Alpine CPU does not include any goals or policies related to paleontological resources, General Plan policies COS-9.1 and COS-9.2 are designed to reduce impacts to paleontological resources and unique geology. Other federal, state, and local regulations, in addition to the County's environmental review process, also protect paleontological resources. However, the proposed project increases densities within the Alpine CPA beyond those analyzed in the 2011 General Plan and FCI GPA, which may impact known and unknown paleontological sites and unique geology within the Alpine CPA to a greater degree than those analyzed in the prior EIRs. Therefore, impacts to paleontological resources, including unique geology, would be **potentially significant**, and mitigation is required **(Impact-CUL-3).**

2.5.3.4 Issue 4: Human Remains

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if project activities would disturb any human remains, Native American or otherwise, including those interred outside of formal cemeteries. Section 15064.5(d) and (e) of the State CEQA Guidelines assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed under PRC Section 5097.98.

Impact Analysis

The prior EIRs determined that the proposed land use and mobility changes and future development would result in potentially significant direct and indirect impacts on human remains due to the potential for human burial sites (known or unknown) within the unincorporated County. The discussion of impacts on human remains from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.4 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to disturb human remains, including those located outside of formal cemeteries. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with the disturbance of human remains. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies that require compliance with regulations and procedures for the proper treatment of human remains if discovered. Specifically, General Plan policy COS-7.5 requires that human remains be treated with the utmost dignity and respect and that all handling of human remains must be done in consultation with the MLD and in accordance with federal, state, and local regulations. A mitigation measure from the prior EIRs, Cul-4.1, also establishes proper processes for treating human remains.

In addition to a proposed increase in density, the Alpine CPU proposes the expansion and reconfiguration of road networks within the Alpine CPA. Future development associated with the proposed project would have the potential to result in impacts on unknown human remains. Ground-disturbing activities associated with the land use designation and mobility changes, such as grading, excavation, and utilities installation, would have the potential to directly adversely impact unknown human remains, particularly

in Subareas 2, 4, and 6, where increased density is proposed, and where mobility changes are proposed. The analysis below focuses on what the change to the environment would be when the allowed number of dwelling units is increased by 2,013 under the proposed project.

Native American consultation began on June 12, 2017, when the County conducted outreach with seven tribes (Barona, Campo, Jamul, Kwaaymii, Santa Ysabel, Sycuan, and Viejas) for purposes of AB-52 consultation. On June 14, 2017, a request was submitted to the NAHC for information on documented Native American resources. Although a Sacred Lands File search was not conducted, the NAHC provided a list of 13 local tribal governments to the County for purposes of SB-18 consultation.

On August 15, 2017, County staff conducted outreach with 13 local tribal governments (Barona, Campo, Ewiiaapaayp, Inaja, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, San Pasqual, Santa Ysabel, Sycuan, and Viejas) that the NAHC identified requesting whether they want to participate in tribal consultation on the proposed project pursuant to SB-18. Three tribes responded (Barona, Jamul, and Santa Ysabel) declining consultation and deferred to the Viejas Band. Viejas requested formal consultation. County staff met with Viejas on October 24, 2017. Viejas was informed that the project is a policy document. They raised no issues and consultation was concluded. Viejas did, however, request to be included in notifications for public review and hearings, and that they be consulted on subsequent projects. The San Pasqual Band was notified of the project on February 3, 2020, and declined consultation because the "project is a GPA and not an actual development project." The results of the tribal outreach did not yield the identification of any known human remains within the Alpine CPA.

There may be unknown human remains in the Alpine CPA that may be indirectly or directly disturbed by future projects implemented under the Alpine CPU. Impacts to human remains may be direct, such as any disturbance resulting from construction activities including grading or excavation, or indirect, such as increased human encroachment. Any disturbance would be considered a significant impact.

The proposed project would allow for a greater density and increase the number of dwelling units in Subareas 2, 4, and 6. In addition, it would allow for new and expanded roadways in the Alpine CPA. Future development would be subject to federal, state, and local laws, and be expected to conform to the General Plan goals and policies, which would reduce impacts to human remains in the CPA. The potential for disturbance may also be reduced through surveying potential development sites prior to any ground-disturbing activities to determine the absence and/or presence of human remains, reviewing archaeological records to determine whether human remains are known to occur in the area, and/or designing future development to avoid areas where burials may be present. Despite these regulations and precautions, and the increased density and expanded mobility network proposed in the Alpine CPA, the proposed project would cause a more severe significant impact related to human remains compared to the impact identified within the prior EIRs because of the increased density of dwelling units and expanded mobility network. As such, the proposed project's impact to human remains would be considered **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.5.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to protect human remains in San Diego County that are also applicable to the proposed project. New projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to human remains, such as NAGPRA, Cal NAGPRA, PRC Section 5097, and the County's RPO.

NAGPRA requires the repatriation of funerary or religious items held by federal agencies or federally funded museums, or removed from federal land, to the American Indians of demonstrated lineal descent. Cal NAGPRA requires the repatriation of such items from state agencies, museums, and lands.

Native American human burials have specific provisions for treatment in PRC Section 5097, as amended by Assembly Bill 2641. Section 5097.98 addresses the disposition of Native American burials, protects such remains, and establishes the NAHC to resolve any related disputes.

California HSC Section 7050.5 has specific provisions for the protection of human burial remains, Native American or otherwise. HSC Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there can be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. In addition, any person who mutilates or disinters, wantonly disturbs, or willfully removes human remains in or from any location other than a dedicated cemetery without authority of the law is guilty of a misdemeanor criminal offense.

CEQA Section 15064.5 (d), (e), and (f) also outline the actions that should be taken when human remains are discovered. According to this Section, once human remains are discovered, no further disturbance of a site or any nearby area reasonably suspected to overlie adjacent human remains is permitted until the coroner is consulted and is able to contact the NAHC and the MLD to determine the suitable manner of treatment and disposition of the remains.

Furthermore, the General Plan includes policy COS-7.5 within the Conservation Element, which requires the proper treatment of human remains including notifying and consulting with the MLD to determine the most respectful manner to handle the remains. The prior EIRs identified mitigation measures addressing impacts related to human remains that would be applicable to the proposed project, including Cul-1.1, Cul-1.6, Cul-2.3, Cul-2.4, Cul-2.5, and Cul-4.1, which are described in Section 2.5.6.

Any development projects undergoing environmental review may also be subject to consultation pursuant to SB-18 and AB-52, which are described in Section 2.5.2. During the environmental review of any future project implemented under the proposed project which is subject to consultation, tribal representatives will have the opportunity to identify areas that may be sensitive for human remains, in which case the County would recommend that the developer avoid the area as part of the project design.

Summary

The proposed project would increase densities within the Alpine CPA, particularly in Subareas 2, 4, and 6. In additional, the proposed project allows for expanded mobility networks, which may add or reconfigure roadways. The Alpine CPU does not include any goals or policies related to human remains, but General Plan policies Cul-1.1, Cul-1.6, Cul-2.3, Cul-2.4, Cul-2.5, and Cul-4.1 protect human remains within San Diego County. Several other federal, state, and local regulations also protect human remains from development-related impacts. The proposed project increases densities within the CPA beyond those established in the General Plan, which may impact unknown human remains within the Alpine CPA to a greater degree than was analyzed in the prior EIRs. Therefore, impacts to human remains would be **potentially significant,** and mitigation is required **(Impact-CUL-4).**

2.5.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for cultural and paleontological resources varies depending on the type of resource with potential to be impacted. While the proposed project is for the most part limited to four of seven subareas, the geographic scope for the cumulative analysis of cultural

resources and paleontological resources for this EIR is the entire Alpine CPA. This is because development activities that increase impacts to surface or subsurface historical resources, archaeological resources, paleontological resources, or human remains within the subareas of the proposed project may degrade these resources in surrounding locations of the Alpine CPA.

The geographic scope for cumulative effects to paleontological resources extends to other Upper Jurassic and Lower Cretaceous Marine and Nonmarine, Cretaceous Nonmarine, and Quaternary Alluvium formations in the surrounding communities of Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura and the Viejas reservation. These communities will also be included in the geographic scope for cumulative impacts to historical resources, archaeological resources, and human remains. Cumulative impacts to archaeological resources and human remains will also be considered for other jurisdictions outside of the County where tribes may feel a connection or stewardship towards archaeological resources and human remains located within the Alpine CPA.

2.5.4.1 Issue 1: Historical Resources

A cumulative impact would occur on historical resources if future development associated with cumulative projected growth within the Alpine CPA would alter or damage a historical resource to the degree that it changes the significance of the resource. Future growth within the Alpine CPA and its associated impacts may result in the physical demolition, relocation, alteration, or degradation of a historical resource during construction or grading activities for a development project. Any impacts to historical resources that may occur as a result of projects relying on the Alpine CPU could cumulatively impact our historical knowledge of San Diego County, including Alpine's neighboring communities. An impact to historical resources in Alpine could result in a loss of information about important events, persons, or architectural styles that may impede the recognition of broader historically significant patterns throughout the region and prevent historical resources in other parts of San Diego County, such as Alpine's neighboring communities, from being recognized as significant.

Similarly, development projects in surrounding communities could impact historical resources and, as a result, cause a loss of knowledge about the Alpine CPA, potentially resulting in a change in the significance in Alpine's historical resources. Cumulative projects that would have the potential to result in adverse impacts to historical resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual historical resources could still be impacted by future development activities and could potentially cause a significant cumulative impact related to historical resources.

As described in Section 2.5.3.1, the land use designation and mobility network changes within the proposed project would have the potential to physically demolish, destroy, relocate, or alter historical resources or their immediate surroundings. Although the cumulative projected growth and development must comply with existing regulations and policies, historical resources could potentially be adversely impacted. This could change the significance of these historical resources, which would constitute a significant impact to historical resources. Therefore, cumulative impacts from future growth and development within the cumulative study area would result in a **potentially significant cumulative impact** and mitigation would be required **(Impact-C-CUL-1).**

2.5.4.2 Issue 2: Archaeological Resources

Future growth and development within the Alpine CPA would have the potential to change the significance of archaeological resources if it could lead to the destruction or disturbance of an archaeological site. Impacts to archaeological resources within four of the seven subareas and the larger Alpine CPA may occur as a result of grading or construction activities during project development implemented under the Alpine CPU. Any project subsequent to the Alpine CPU that impacts archaeological resources would adversely impact our understanding of the cultural history of the region and our ability to interpret other archaeological resources within it. This could lead to the misrecognition of the significance of archaeological resources in neighboring communities because the loss of one resource would mean a loss of understanding of and connection between nearby archaeological resources.

Impacts to archaeological resources caused by development or increased human encroachment in other communities could similarly create a loss of knowledge that subsequently impacts the significance of archaeological resources within the Alpine CPA. Cumulative projects that would have the potential to result in adverse impacts to archaeological resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual archaeological resources could still be impacted by future development activities and could potentially cause a significant cumulative impact related to historical resources.

As described above in Section 2.5.3.2, the proposed project would increase development and population density beyond what was anticipated in the prior EIRs. Although any future development projects would be required to comply with federal, state and local regulations that protect archaeological resources, these resources could still be adversely impacted. Impacts to archaeological resources are difficult to mitigate because these resources may have cultural and religious value that is not accounted for in the data recovery and monitoring programs specified in these regulations. As such, the proposed project would cause a greater impact to archaeological resources compared to the 2011 General Plan and FCI GPA because of the proposed increase in allowed density and the proposed expansion of the mobility network. In combination with projects that may be proposed subsequent to the Alpine CPU, the proposed project would have a **potentially significant cumulative impact** and mitigation would be required **(Impact-C-CUL-2).**

2.5.4.3 Issue 3: Paleontological Resources

Future development projects located within the Alpine CPA would have the potential to result in a cumulative impact to paleontological resources, including unique geology, due to grading, excavation, or other ground-disturbing activities that may disturb these resources. In addition, if a future project that requires excavation or grading is located in an area of low, marginal, or moderate sensitivity, or an area with a high or moderate potential to produce unique geology, there would be an increased potential for an adverse impact to paleontological resources. Furthermore, the proposed project may have a cumulative impact on paleontological resources, including unique geology, within the entire Alpine CPA and neighboring communities with Upper Jurassic and Lower Cretaceous Marine and Nonmarine, Cretaceous Nonmarine, and Quaternary Alluvium formations in San Diego County, as any information lost due to subsequent projects in the Alpine CPA will equate to a loss of information about all such formations in the region.

Any future development projects in neighboring communities that could disturb paleontological resources, including unique geology, particularly projects in areas of known sensitivity for paleontological resources and unique geology, could subsequently impact the significance of paleontological resources within the Alpine CPA. Cumulative projects that would have the potential to result in adverse impacts to paleontological resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual paleontological resources, including unique geology, could still be impacted by future development activities and could potentially cause a significant cumulative impact related to paleontological resources and unique geology.

As described above in Section 2.5.3.3, the proposed land use designation changes and modifications to the mobility network could result in significant impacts to paleontological resources and unique geology in the Alpine CPA, which could subsequently impact the significance of paleontological resources in neighboring communities. Although all future development projects within the Alpine CPA will be required to follow federal, state, and local regulations that are designed to protect paleontological resources, there may still be significant cumulative impacts to paleontological resources and unique geology within the Alpine CPA and in neighboring communities. Therefore, future proposed development would result in a **potentially significant cumulative impact** and mitigation would be required **(Impact-C-CUL-3).**

2.5.4.4 Issue 4: Human Remains

Future growth and development within the Alpine CPA would have the potential to result in impacts on human remains due to grading, excavation, or other ground-disturbing activities. It is difficult to circumscribe the potential effects of any impacts on human remains within the Alpine CPA because of their potential to hold profound cultural, ideological, and religious significance. Any project subsequent to the Alpine CPU that impacts human remains would cumulatively impact not only Alpine but also neighboring communities. Such impacts negatively impact our understanding of the cultural history of the San Diego County and may lead to the misrecognition of areas that are sensitive for human remains in other parts of the County.

Future development in neighboring communities could impact human remains, which would be considered a cumulative significant impact to human remains in the Alpine CPA as well. Cumulative projects that would have the potential to result in adverse impacts to human remains include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, human remains could still be impacted by future development activities and could potentially cause a significant cumulative impact related to human remains.

As discussed in Section 2.5.3.4, although there are no known human remains within the Alpine CPA, implementation of the proposed project would have the potential to disturb unknown human remains, including those located outside of formal cemeteries, from ground-disturbing activities associated with the future development of land uses. All future development projects will be subject to federal, state, and local regulations governing the treatment of human remains, but impacts to human remains are difficult to mitigate because these resources may have cultural and religious value that is not accounted for in the

data recovery and monitoring programs specified in these regulations. Because land use designations and mobility network changes associated with the Alpine CPU allow for greater development than was allowed by the General Plan, the proposed project would have a greater impact on human remains than was analyzed by the prior EIRs. As such, in combination with other cumulative projects, the proposed project would result in a **potentially significant cumulative impact** and mitigation would be required **(Impact-C-CUL-4).**

2.5.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the Alpine CPA would result in potentially significant direct and cumulative impacts to historical resources, archaeological resources, paleontological resources, and human remains.

Impact-CUL-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. This would be considered a significant impact.

Impact-CUL-2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to archaeological resources compared to the prior EIRs. This would be considered a significant impact.

Impact-CUL-3: Result in the Direct or Indirect Destruction of a Unique Paleontological Resource. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to paleontological resources and unique geology compared to the prior EIRs. This would be considered a significant impact.

Impact-CUL-4: Disturb Human Remains. Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to human remains compared to the prior EIRs. This would be considered a significant impact.

Impact-C-CUL-1: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of a Historical Resource. The proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-CUL-2: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of an Archaeological Resource. The proposed project would cause a more severe potentially significant impact related to archaeological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-CUL-3: Result in a Cumulatively Considerable Contribution to the Direct or Indirect Destruction of a Unique Paleontological Resource. The proposed project would cause a more severe potentially significant impact related to paleontological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-CUL-4: Result in a Cumulatively Considerable Contribution to the Disturbance of Human Remains. The proposed project would cause a more severe potentially significant impact related to human remains compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.5.6 Mitigation

2.5.6.1 Issue 1: Historical Resources

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce (**Impact-CUL-1** and **Impact-C-CUL-1**) impacts to historical resources, to less than significant.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-1.1 through Cul-1.8 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on historical resources.

Alpine CPU Mitigation Measures

MM-CUL-1 Important historic resources in the Alpine Plan area shall be protected through utilization of dedicated open space.

MM-CUL-2 Support the preparation of an inventory of significant historical landmarks in Alpine.

MM-CUL-3 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially historical significant resource is present on site. If it is determined that potentially significant historical resources are present on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County Planning & Development Services (PDS) staff determination, the preparation of a technical report or memorandum that would evaluate the historical significance of the resource and identify appropriate mitigation measures, as required.

2.5.6.2 Issue 2: Archaeological Resources

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce (**Impact-CUL-2** and **Impact-C-CUL-2**) impacts to archaeological resources, to less than significant.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-2.1 through Cul-2.6 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on archaeological resources.

Alpine CPU Mitigation Measures

MM-CUL-4 Important archaeological resources in the Alpine Plan area shall be protected through utilization of dedicated open space.

MM-CUL-5 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a), and the RPO has the potential to be located on site. If it is determined that an archaeological resource has the potential to be located on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County PDS staff determination, the preparation of a technical report or memorandum that would evaluate the significance of the resource and identify appropriate mitigation measures.

2.5.6.3 Issue 3: Paleontological Resources

As discretionary projects are submitted, CEQA review would be completed to determine the type of project-specific paleontological monitoring or mitigation that may be required. In addition, the following prior EIRs and Alpine CPU-specific mitigation measures would reduce (**Impact-CUL-3 and Impact-C-CUL-3**) impacts to paleontological resources and unique geology, to less than significant.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-3.1 through Cul-3.2 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on paleontological resources.

Alpine CPU Mitigation Measures

MM-CUL-6 Paleontological monitoring programs will be implemented for projects that are located within paleontological sensitive areas that include Subarea 2. The monitoring program will be implemented on a project-by-project basis and conform to all applicable federal, state, and local regulations and the County's Guidelines for Determining Significance - Paleontological Resources.

MM-CUL-7 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any unique geology is present on site. If it is determined that unique geology is present on site, compliance with the County's Guidelines for Determining Significance – Unique Geology, shall be required. This may require, pursuant to County PDS staff determination, incorporation of project design features and mitigation measures to reduce impacts.

2.5.6.4 Issue 4: Human Remains

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures, Cul-4 and Cul-5 identified above, would reduce (**Impact-CUL-4** and **Impact-C-CUL-4**) impacts to human remains, to less than significant.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measure is being carried forward and shall apply to the proposed project: Cul-4.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this mitigation measure would reduce the proposed project's impacts on human remains.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.5.7 Conclusion

2.5.7.1 Issue 1: Historical Resources

Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes to the significance of known and unknown historical resources as compared to the impacts identified in the prior EIRs, which would be considered a potentially significant impact (**Impact-CUL-1**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact **(Impact-C-CUL-1).** However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures described in 2.5.6.1, would mitigate direct and cumulative impacts to historical resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

2.5.7.2 Issue 2: Archaeological Resources

Implementation of the proposed project would allow increased development densities to occur in some areas of the Alpine CPA, which would potentially cause a more severe substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of an archaeological site that contains or has the potential to contain information important to history or prehistory. Therefore, the proposed project would result in a greater impact on archaeological resources as compared to the prior EIRs, which would be considered a potentially significant impact (**Impact-CUL-2**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact **(Impact-C-CUL-2).** However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures described in 2.5.6.2, would mitigate direct and cumulative impacts to archaeological resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

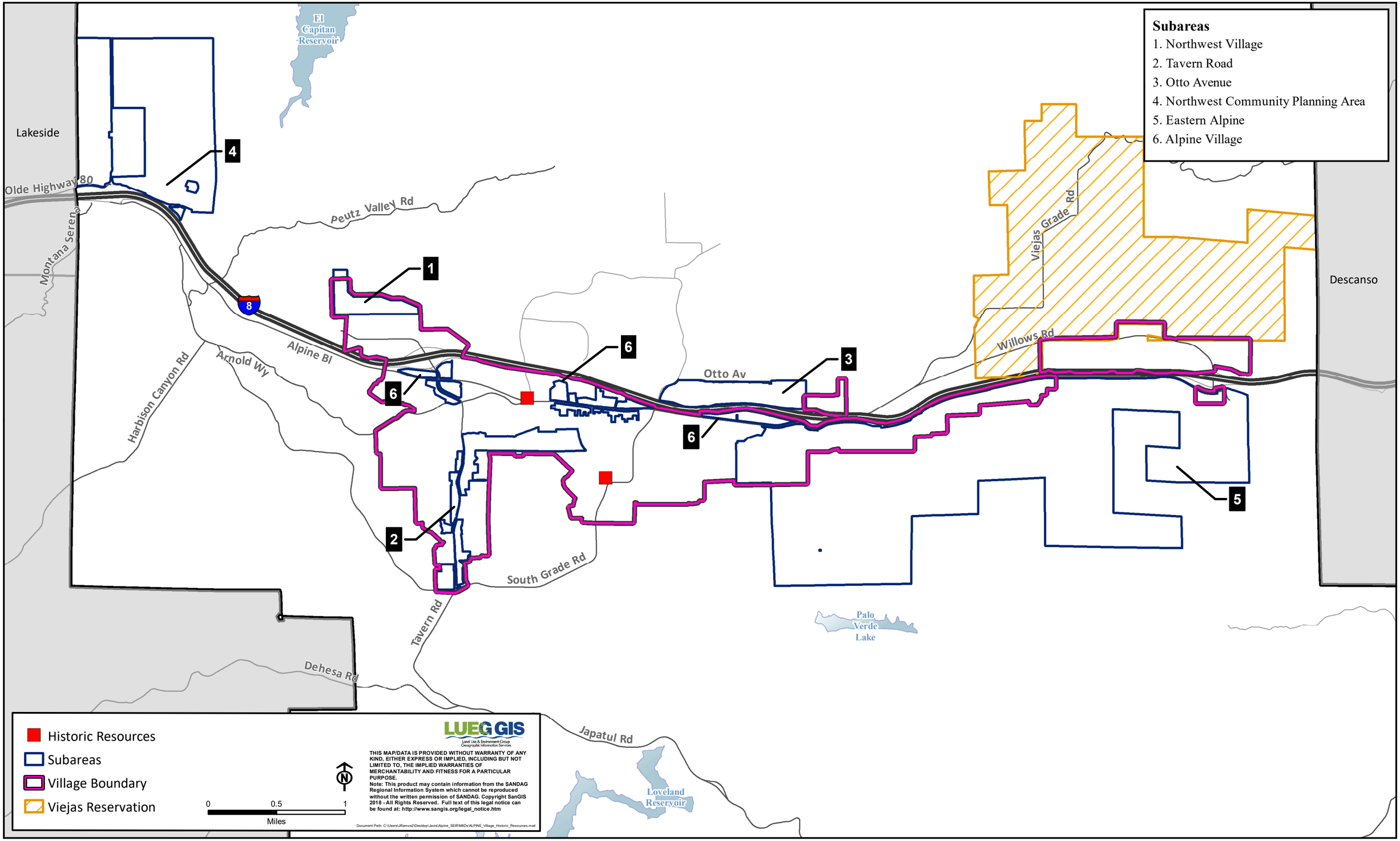
2.5.7.3 Issue 3: Paleontological Resources

Implementation of the proposed project would result in increased future development in areas of the Alpine CPA that are sensitive for the presence of paleontological resources and unique geology, which could potentially adversely impact unique paleontological resources. Therefore, the proposed project would result in a greater potential impact on paleontological resources and unique geology as compared to the prior EIRs (**Impact-CUL-3**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact **(Impact-C-CUL-3).** However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures

described in 2.5.6.3 would mitigate direct and cumulative impacts to paleontological resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

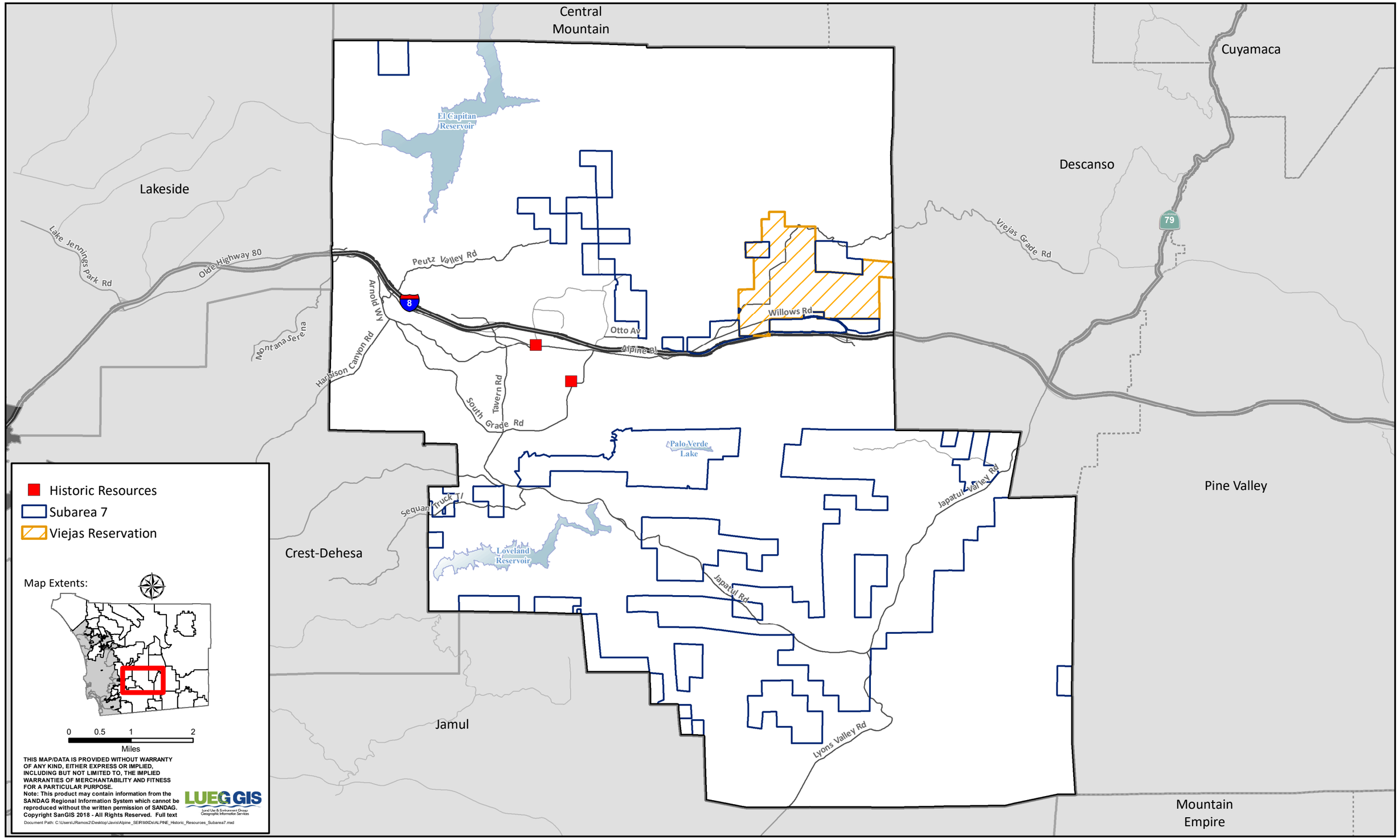
2.5.7.4 Issue 4: Human Remains

Implementation of the proposed project would result in increased new development in the Alpine CPA, which could disturb human remains, including those discovered outside of formal cemeteries. Therefore, the proposed project would result in a greater potential impact associated with human remains as compared to the prior EIRs (**Impact-CUL-4**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact **(Impact-C-CUL-4).** However, for the reasons described above, the application of existing regulations, in combination with the County's RPO, Zoning Ordinance, and the General Plan policies and mitigation measures, would mitigate direct and cumulative impacts on human remains to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.



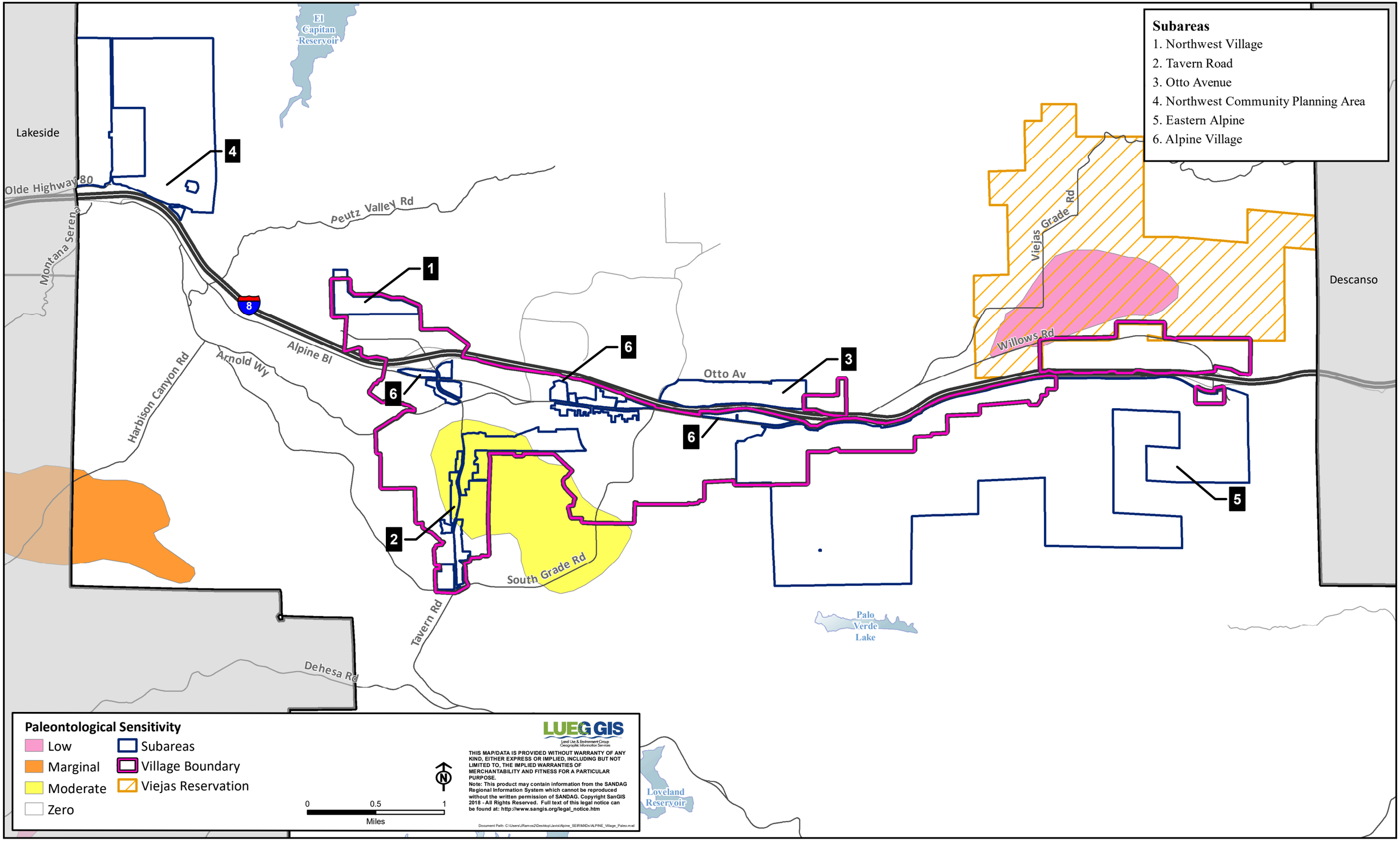
Source: SanGIS, County of San Diego, 2020

Figure 2.5-1a
Historic Resources
Subareas 1-6



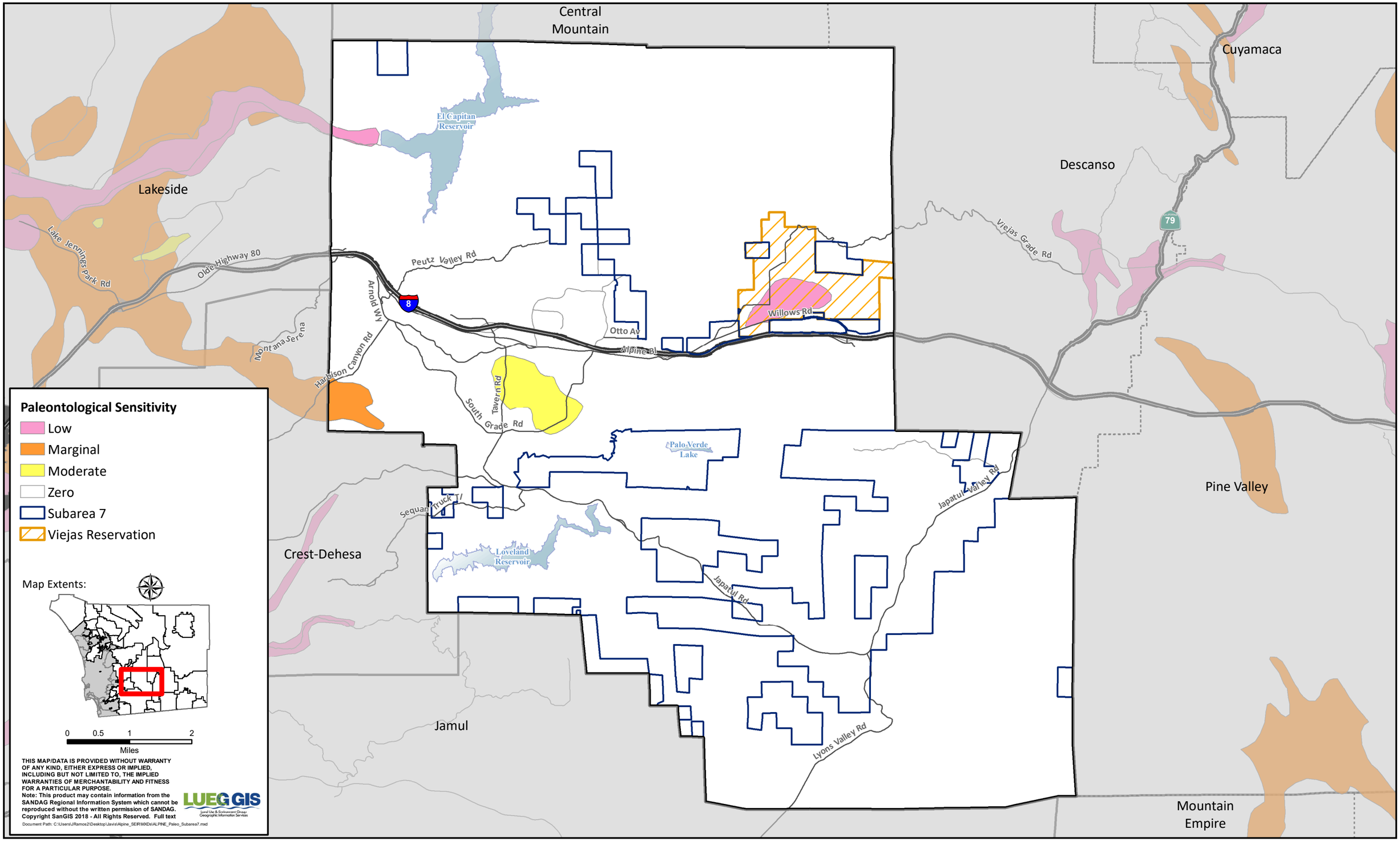
Source: SanGIS, County of San Diego, 2020

Figure 2.5-1b
Historic Resources
Subarea 7



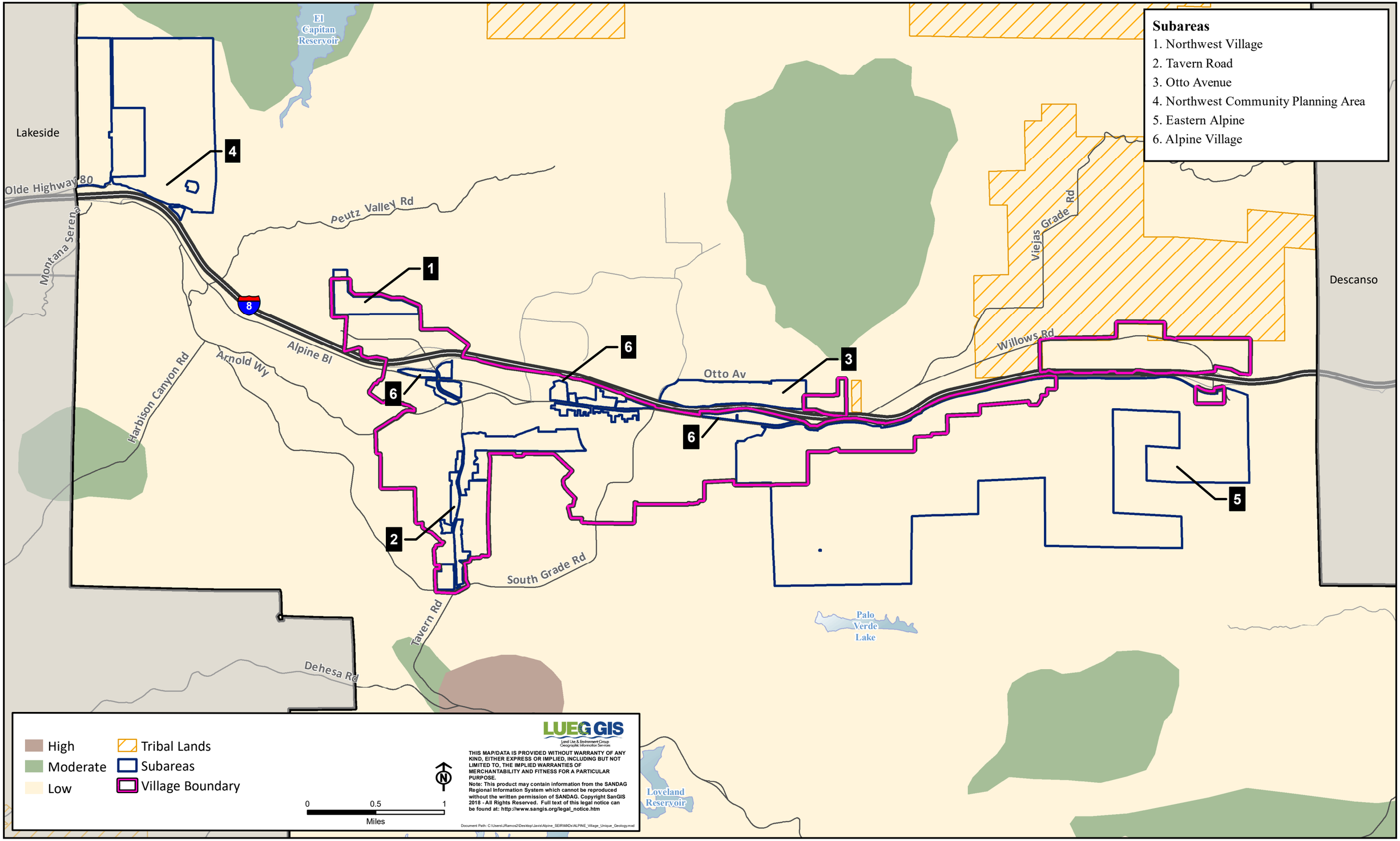
Source: SanGIS, County of San Diego, 2019

Figure 2.5-2a
Paleontological Sensitivity
Subareas 1-6



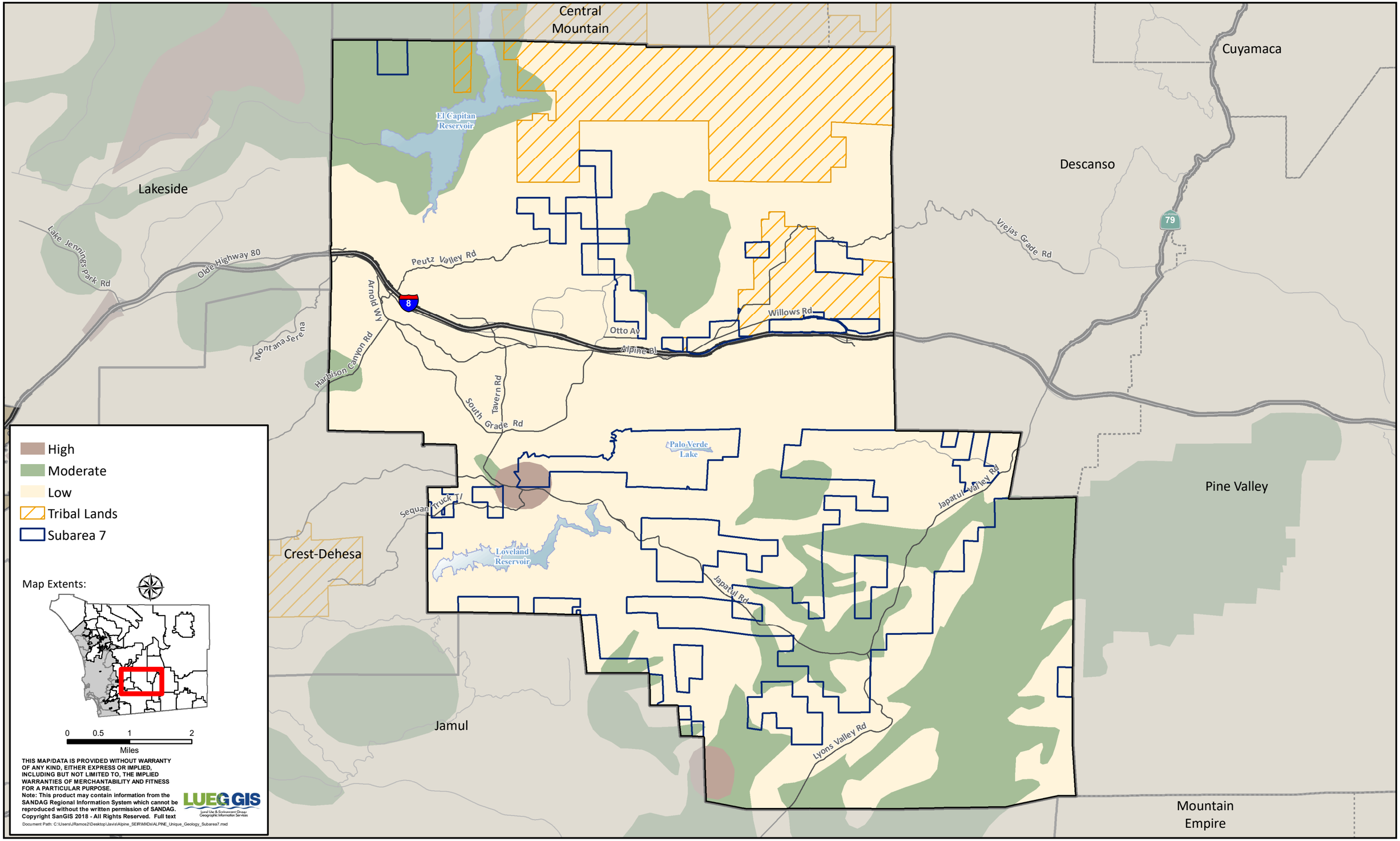
Source: SanGIS, County of San Diego, 2020

Figure 2.5-2b
Paleontological Sensitivity
Subarea 7



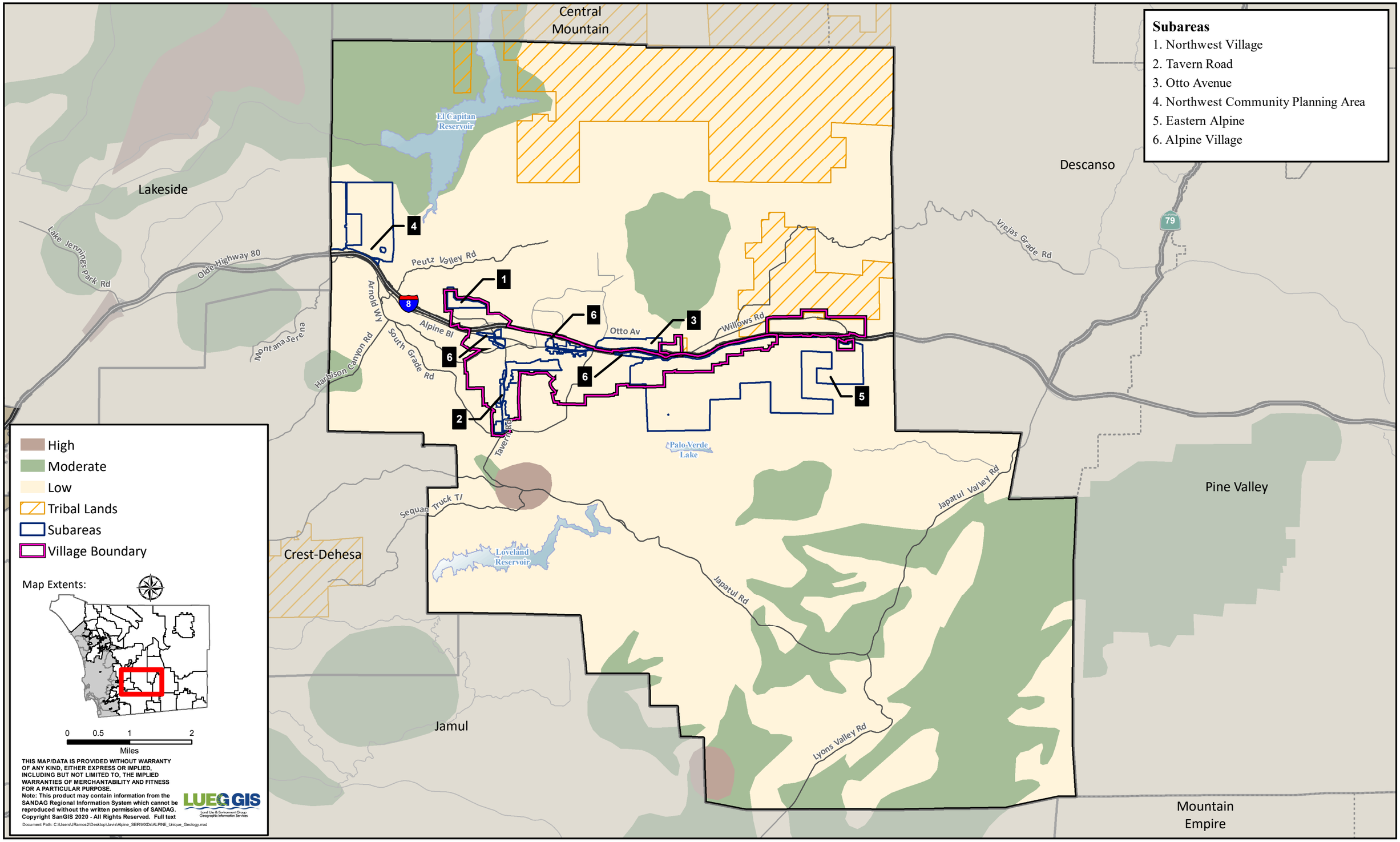
Source: SanGIS, County of San Diego, 2020

Figure 2.5-3a
Unique Geology
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.5-3b
Unique Geology
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.5-3c
Unique Geology

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2.6 Greenhouse Gas Emissions and Climate Change

This section of the Supplemental Environmental Impact Report (SEIR) presents a summary of regulations applicable to greenhouse gas (GHG) emissions, a summary of climate change science and GHG sources in California and San Diego County, quantification of GHGs anticipated to be emitted from construction and operation of the Alpine Community Plan Update (CPU) (proposed project), and a discussion of their contribution to global climate change.

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) as it applies to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both the 2011 General Plan EIR and the Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR. The 2011 General Plan EIR analyzed the entirety of the Alpine Community Plan Area (CPA) while the FCI GPA EIR provided an updated analysis of impacts of land use changes within the former FCI lands. Only the 2011 General Plan EIR will be used for analysis of GHGs due to the outcome of litigation of the FCI GPA. Goals, policies, and mitigation measures from the 2011 General Plan and General Plan EIR are relevant to this section and will be referenced throughout.

Table 2.6-1 summarizes the impact conclusions identified in this section. The "Prior EIR Conclusion" column of the table contains conclusions from the 2011 General Plan EIR only.

Table 2.6-1. Summary of Greenhouse Gas and Climate Change Impacts.

Issue Number	Issue Topic	Prior EIR Conclusion	Project Direct Impact(s)[1]	Project Cumulative Impact(s)	Level of Significance After Mitigation
GHG-1	Generation of GHG Emissions in 2030	Less than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
GHG-2	Generation of GHG Emissions in 2050	N/A [2]	Potentially Significant	Potentially Significant	Significant and Unavoidable
GHG-3	Conflict with Applicable Plan(s) in 2030	Less than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
GHG-4	Conflict with Applicable Plan(s) in 2050	N/A [2]	Potentially Significant	Potentially Significant	Significant and Unavoidable

N/A – not applicable

[1] For the purposes of CEQA, impacts from GHGs are inherently cumulative as described in Section 2.6.3.

[2] The 2011 General Plan EIR analyzed impacts related to emissions of GHGs consistent with AB 32. This analysis did not provide an impact discussion for emissions from plan buildout to a 2050 horizon year.

Comments received in response to the NOP related to GHGs and climate change included recommendations to encourage land use development activities that reduce vehicle miles traveled (VMT) and GHG emissions from on-road vehicles, including improving walkways and bicycle infrastructure to encourage walkable and bikeable community centers. These comments are addressed in this section.

A copy of the Notice of Preparation (NOP) and associated comment letters are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIR where applicable to the proposed project.

2.6.1 Existing Conditions

A discussion of the existing understanding of global climate change and its effects are included in Section 2.17.1, *Existing Conditions,* of the 2011 General Plan EIR and is incorporated by reference. The global climate change existing conditions described in the 2011 General Plan EIR are similar to the existing conditions evaluated in this SEIR. This section includes updates to existing conditions since the adoption of the 2011 General Plan that are relevant to the proposed project.

2.6.1.1 Greenhouse Gas Emissions

Physical Scientific Basis of Greenhouse Gas and Climate Change

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected toward space. The absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-generated emissions of these GHGs in excess of natural ambient concentrations are found to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropomorphic increase in GHG concentrations and other anthropomorphic forcing (IPCC 2014). This warming is observable considering the 20 hottest years ever recorded occurred within the past 30 years (McKibben 2018).

Climate change is a global problem; thus, GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with perfect certainty, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remain stored in the atmosphere (IPCC 2013).

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is substantial. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of the California

Environmental Quality Act (CEQA), GHG impacts relative to global climate change are inherently cumulative.

Greenhouse Gas Emission Sources

State

As discussed previously, GHG emissions are attributable in large part to human activities. The total GHG inventory for California in 2017 was 424 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) (CARB 2018). This is less than CARB's Assembly Bill (AB) 32 target to reduce emissions to 1990 levels by 2020 equal to 431 $MMTCO_2e$ (CARB 2019). Table 2.6-2 summarizes the statewide GHG inventory for California.

Table 2.6-2. Statewide Greenhouse Gas Emissions by Economic Sector

Sector	Emissions ($MMTCO_2e$)	Percent
Transportation	174.3	41
Industrial	101.1	24
Electricity generation (in state)	38.6	9
Electricity generation (imports)	24.0	6
Agriculture	32.4	8
Residential	30.4	7
Commercial	23.3	5

$MTCO_2e$ = metric tons of carbon dioxide equivalent
Source: CARB 2019

San Diego County

In addition to the State inventory discussed above, a regional GHG inventory accounting for emissions generated by activities in 2012 was prepared for the San Diego region by the San Diego Association of Governments (SANDAG) in 2015. This inventory details the GHG emissions sources generated from activities occurring in the county. Table 2.6-3 provides a summary of the 2012 baseline inventory and forecast years. This inventory represents the most recent inventory prepared for the region that includes the unincorporated County, consistent with regional sustainability planning efforts.

Table 2.6-3 shows that, in 2012, a total of 34.67 $MMTCO_2e$ were generated by activities in the county. The largest contributor of GHG emissions was on-road transportation, which includes emissions from gasoline and diesel fuel use from vehicles operating on roadways. The second largest contributor was electricity consumption, which accounts for electricity generated from non-renewable sources and consumed at buildings and developments.

In addition to the emissions sectors listed above, wildfires can also contribute to emissions of GHGs. Wildfires are not included in the County or State GHG inventories because a standard accounting protocol is not available, and wildfires occur intermittently rather than year-to-year at a predictable frequency. Most recently, the Valley Fire occurred in September 2020, burning approximately 16,390 acres of wildland in the Cleveland National Forest near the Alpine CPA (Cleveland National Forest 2020). GHG emissions related to wildfires would not be a direct result of the project. Therefore, GHG emissions from wildfires are not quantitatively accounted for in this GHG emissions analysis. It should be noted that the EIR includes mitigation measures and project design considerations that intend to aid in the prevention

of and preparation for wildfires, as addressed in Chapter 2.7, *Wildfire*. These would also assist in attempting to minimize future GHG emissions from wildfires occurring in and near the Alpine CPA.

Table 2.6-3. San Diego Regional Greenhouse Gas Emissions Inventory and Forecast ($MMTCO_2e$)

Emissions Categories	2012 Inventory	2020	2025	2035	2050
On-Road Transportation[1]	15.03	13.07	11.23	9.72	9.79
Electricity	7.97	6.41	6.32	6.05	5.76
Industrial	3.07	3.09	3.11	3.15	3.26
Natural Gas	2.84	2.79	2.76	2.73	2.69
Off-Road Transportation[2]	2.45	2.67	2.95	3.47	3.96
Solid Waste	1.75	0.84	0.88	0.93	0.98
Other[3]	1.45	1.46	1.48	1.52	1.58
Water and Wastewater	0.68	0.69	0.72	0.78	0.82
Agriculture	0.08	0.06	0.05	0.03	0.02
Regulatory Reductions[4]	-0.65	-2.94	-2.92	-2.88	-2.83
Total	**34.67**	**28.14**	**26.58**	**25.5**	**26.03**

$MTCO_2e$ = metric tons of carbon dioxide equivalent
Notes:
[1] On-road transportation emissions consist of passenger cars and light-duty vehicles, and heavy-duty trucks and vehicles.
[2] Off-road transportation emissions include emissions from aviation, off-road vehicles, rail, and marine vessels.
[3] Other emissions include estimated emissions from wildfires and thermal cogeneration.
[4] Regulatory reductions account for emissions reductions from sequestration, Low Carbon Fuel Standard, Cap-and-Trade, and High Global Warming Potential gas requirements.
Source: SANDAG 2015

Effects of Climate Change on the Environment

According to the Intergovernmental Panel on Climate Change (IPCC), which was established in 1988 by the World Meteorological Organization and the United Nations Environment Programme, global average temperature will increase by 3.7 to 4.8 degrees Celsius (°C) (6.7 to 8.6 degrees Fahrenheit [°F]) by the end of the century unless additional efforts to reduce GHG emissions are made (IPCC 2014). According to the California Energy Commission (CEC), temperatures in California will warm by approximately 2.7°F above 2000 averages by 2050 and by 4.1°F to 8.6°F by 2100, depending on emission levels (CEC 2012).

Other environmental resources could be indirectly affected by the accumulation of GHG emissions and the resulting rise in global average temperature. In recent years, California has been marked by extreme weather and its effects. According to California Natural Resources Agency's (CNRA) *Safeguarding California Plan: 2018 Update*, California experienced the driest 4-year statewide precipitation on record from 2012 through 2015; the warmest years on average in 2014, 2015, and 2016; and the smallest and second smallest Sierra snowpack on record in 2015 and 2014. In contrast, the northern Sierra Nevada experienced its wettest year on record during the 2016–2017 water year (CNRA 2018). The changes in precipitation exacerbate wildfires throughout California, increasing their frequency, size, and devastation. As temperatures increase, the amount of precipitation falling as rain rather than snow also increases, which could lead to increased flooding because water that would normally be held in the snowpack of the

Sierra Nevada and Cascade Range until spring would flow into the Central Valley during winter rainstorm events. This scenario would place more pressure on California's levee/flood control system (CNRA 2018). Furthermore, in the extreme scenario involving the rapid loss of the Antarctic ice sheet, the sea level along California's coastline could rise up to 10 feet by 2100, which is approximately 30–40 times faster than the sea-level rise experienced over the last century (CNRA 2017). Changes in temperature, precipitation patterns, extreme weather events, wildfires, and sea-level rise have the potential to threaten transportation and energy infrastructure and crop production (CNRA 2018).

Cal-Adapt is a climate change scenario planning tool developed by CEC that downscales global climate model data to local and regional resolution under two emissions scenarios, the Representative Concentration Pathway (RCP) 8.5 scenario and the RCP 4.5 scenario. The RCP 8.5 scenario represents a business-as-usual future emissions scenario, and the RCP 4.5 scenario represents a future with reduced GHG emissions. Cal-Adapt can provide climate change scenarios information specific to the local geography. The geography available in Cal-Adapt most representative of the entire Alpine CPA is the "Alpine Census Designated Place." According to Cal-Adapt, Alpine CPA experienced an annual average high temperature of 74.4°F between 1950 and 2005. Under the RCP 8.5 scenario, the Alpine CPA's annual average high temperature is projected to increase by 3.1°F to 77.5°F by 2050 and increase by an additional 2.3°F to 79.8°F by 2099 (CEC 2020). Under the RCP 4.5 scenario, the Alpine CPA's annual average high temperature is projected to increase by 2.8°F to 77.2°F by 2050 and increase by an additional 1.2°F to 78.4°F by 2099 (CEC 2020).

The Alpine CPA experienced an average precipitation of 19.3 inches per year between 1950 and 2005. Under the RCP 8.5 scenario, the Alpine CPA is projected to experience an increase of 1.4 inches per year by 2050 and an increase of 2.3 inches per year by 2099 (CEC 2020). Under the RCP 4.5 scenario, the Alpine CPA is projected to experience an increase of 2.4 inches per year by 2050 and an increase of 2 inches per year by 2099 (CEC 2020).

2.6.2 Regulatory Framework

Section 2.17.2 of the 2011 General Plan EIR describes the regulatory framework related to GHGs and climate change and is hereby incorporated by reference. This section also describes updates or changes to regulations and any new regulations enacted since the approval of the 2011 General Plan EIR.

Applicable federal regulations from the 2011 General Plan EIR include:

- Supreme Court ruling in *Massachusetts et al. v. Environmental Protection Agency et al.,* U.S. 497 (2007)
- Federal Clean Air Act (CAA)
- Energy Independence and Security Act of 2007

Applicable State regulations include:

- California Code of Regulations (CCR) Title 24, Part 6
- Executive Order S-3-05
- AB 32, *California Global Warming Solutions Act*
- Senate Bill (SB) 375

Applicable regulations not included or enacted after adoption of the General Plan are described below.

2.6.2.1 Federal Regulations

Regulations for Greenhouse Gas Emissions from Passenger Cars and Trucks

In August 2019, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA) jointly published a notice of proposed rulemaking for Part One of the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). The SAFE Rule proposes new and amended CO_2, Corporate Average Fuel Economy (CAFE), and GHG emissions standards for passenger cars and light trucks. Additionally, Part One of the SAFE Rule withdraws the State's waiver, afforded under the CAA to set GHG and zero-emissions vehicle (ZEV) standards separate from the federal government. Part One of the SAFE Rule became effective in November 2019. In March 2020, Part Two of the SAFE Rule was published which sets amended fuel economy and CO_2 standards for passenger cars and light trucks for model years 2021 through 2026. Part Two became effective 60 days after publication in the Federal Register. CARB has prepared off-model adjustment factors for the Emissions Factor model (EMFAC) to account for the impact of the SAFE Rule. These adjustment factors account for changes in criteria pollutant estimates from mobile sources for nitrogen dioxide (NO_2), respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$), and carbon monoxide (CO) and GHGs for CO_2, and were applied within this analysis to account for the potential changes to estimated vehicle emissions as a result of the SAFE Rule.

2.6.2.2 State Regulations

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of ZEVs, into a single package of regulatory standards for vehicle model years 2017–2025. The new regulations strengthen the GHG standards for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's ZEV regulation requires battery, fuel cell, and plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025 (CARB 2016a). The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, GHG emissions from the statewide fleet of new cars and light-duty trucks will be reduced by 34 percent, and cars will emit 75 percent less smog-forming pollution than the statewide fleet in 2016 (CARB 2016b). However, as described previously in Section 2.6.2.1, the implementation of the SAFE Rule would limit CARB's ability to implement this program.

California Renewables Portfolio Standard

SB X1-2 of 2011 required all California utilities to generate 33 percent of their electricity from renewables by 2020. SB 100 of 2018 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 50 percent of their electricity from renewables by December 31, 2026; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045.

Executive Order B-30-15

On April 20, 2015, Executive Order (EO) B-30-15 was signed into law and established a California GHG reduction target of 40 percent below 1990 levels by 2030. EO B-30-15 aligns California's GHG reduction targets with those of leading international governments, such as the 28-nation European Union, which adopted the same target in October 2014. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32). California's emission reduction target of 40 percent below 1990 levels by 2030 sets the next interim step in the State's continuing efforts to pursue the long-term target expressed under EO S-3-05 to reach the goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the United States to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

Senate Bill 32

In August 2016, SB 32 was signed into law and serve to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continued efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050.

Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which aims to result in the generation of fewer GHG emissions. Effective January 1, 2020, the 2019 California Energy Code requires builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use from the prior 2016 Standards. Additionally, new residential units are required to include solar panels, which are sized to offset the estimated electrical requirements of each unit (CCR, Title 24, Part 6, Section 150.1[c]14). CEC estimates that the combination of required energy-efficiency features and mandatory solar panels in the 2019 California Energy Code will result in new residential buildings that use 53 percent less energy than those designed to meet the 2016 California Energy Code. CEC also estimates that the 2019 California Energy Code will result in new commercial buildings that use 30 percent less energy than those designed to meet the 2016 standards, primarily through the transition to high-efficiency lighting (CEC 2018).

Low Carbon Fuel Standard

In January 2007, EO S-1-07 established a Low Carbon Fuel Standard (LCFS). The EO calls for a statewide goal to be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and for an LCFS for transportation fuels to be established for California. The LCFS applies to all refiners, blenders, producers, or importers (providers) of transportation fuels in California, including fuels used by off-road construction equipment (Wade, pers. comm. 2017). The LCFS is measured on the total fuel cycle and may be met through market-based methods. For example, providers exceeding the performance required by an LCFS receive credits that may be applied to future obligations or traded to providers not meeting the LCFS.

In June 2007, CARB adopted the LCFS as a Discrete Early Action item under AB 32 pursuant to Health and Safety Code Section 38560.5, and in April 2009, CARB approved the new rules and carbon intensity reference values with new regulatory requirements taking effect in January 2011. The standards require providers of transportation fuels to report on the mix of fuels they provide and demonstrate they meet the LCFS intensity standards annually. This is accomplished by ensuring that the number of "credits" earned by providing fuels with a lower carbon intensity than the established baseline (or obtained from another party) is equal to or greater than the "deficits" earned from selling higher-intensity fuels.

CARB readopted the LCFS regulation in September 2015, and the LCFS went into effect on January 1, 2016.

Climate Change Scoping Plan

In December 2008, CARB adopted its first version of its *Climate Change Scoping Plan,* which contained the main strategies California will implement to achieve the mandate of AB 32 (2006) to reduce statewide GHG emissions to 1990 levels by 2020. In May 2014, CARB released and subsequently adopted the *First Update to the Climate Change Scoping Plan* to identify the next steps in reaching the goals of AB 32 (2006) and evaluate the progress made between 2000 and 2012 (CARB 2014). After releasing multiple versions of proposed updates in 2017, CARB adopted the final version titled *California's 2017 Climate Change Scoping Plan* (2017 Scoping Plan) in December (CARB 2017). The 2017 Scoping Plan indicated that California is on track to achieve the 2020 statewide GHG target mandated by AB 32 of 2006 (CARB 2017). It also laid out the framework for achieving the mandate of SB 32 of 2016 to reduce statewide GHG emissions to at least 40 percent below 1990 levels by the end of 2030 (CARB 2017).

The 2017 Scoping Plan identifies the GHG reductions needed by each emissions sector and in *Appendix B, Local Action*, provides examples of local actions that can be implemented to support the State's climate goals. Specifically, this appendix provides a list of example mitigation measures that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency.

Senate Bill 743 of 2013

SB 743 of 2013 required that the Governor's Office of Planning and Research (OPR) propose changes to the State CEQA Guidelines to address transportation impacts in transit priority areas and other areas of the state. In response, Section 15064.3 was added to CEQA in December 2018, requiring that transportation impacts no longer consider congestion related to Levels of Service (LOS), but instead focus on the impacts of VMT. Agencies were required to implement these changes effective July 1, 2020. In support of these changes, OPR published its *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which recommended that the transportation impact of a project be based on whether the project would generate a level of VMT per capita (or VMT per employee or some other metric) that is 15 percent lower than that of existing development in the region (OPR 2017), or allowed for other thresholds to be used to analyze projects based on substantial evidence. OPR's technical advisory explains that this criterion is consistent with PRC Section 21099, which states that the criteria for determining significance must "promote the reduction in greenhouse gas emissions" (OPR 2017). This metric is intended to replace the use of delay and level of service to measure transportation-related impacts. More detail about SB 743 is provided in the Regulatory Setting section of Section 3.13, *Transportation*.

Executive Order B-48-18: Zero-Emission Vehicles

In January 2018, EO B-48-18 was signed into law and requires all state entities to work with private sector entities to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 EV charging stations by 2025. It specifies that 10,000 of the EV charging stations should be

direct current fast chargers. This EO also requires all state entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a *Plug-in Charging Station Design Guidebook* and update the *2015 Hydrogen Station Permitting Guidebook* (Eckerle and Jones 2015) to aid in these efforts. All state entities are required to participate in updating the *2016 Zero-Emissions Vehicle Action Plan* (Governor's Interagency Working Group on Zero-Emission Vehicles 2016) to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all state entities are required to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS program, and to recommend how to ensure affordability and accessibility for all drivers.

2.6.2.3 Local Regulations

San Diego County Air Pollution Control District

The San Diego County Air Pollution Control District (SDAPCD) has jurisdiction over air quality programs in the county. SDAPCD regulates most air pollutant sources, except for mobile sources, which are regulated by CARB or EPA. State and local government projects, as well as projects proposed by the private sector are subject to SDAPCD requirements if the sources are regulated by the SDAPCD.

Under the requirements of the California Clean Air Act, each local air district is required to develop its own strategies to achieve both state and federal air quality standards for its air basin. Accordingly, SDAPCD developed the San Diego Regional Air Quality Strategy (RAQS), which includes trigger levels for criteria air pollutants that were subsequently adopted as screening level thresholds for CEQA purposes by the County. To date, however, the SDAPCD has not formally adopted a regional strategy for reducing GHGs similar to criteria air pollutants or developed thresholds of significance under CEQA.

San Diego Association of Governments

Sustainable Communities Strategy

Since passage of SB 375 in 2008, CARB requires metropolitan planning organizations (MPOs) to develop and adopt sustainable communities strategies (SCSs) in addition to the federally-prepared regional transportation plans (RTPs) that show reductions in GHG emissions from passenger cars and light-duty trucks in their respective regions for 2020 and 2035. These plans link land use and housing allocation to transportation planning and related mobile-source emissions. SANDAG serves as the MPO for the San Diego region. In 2011, the SANDAG Board of Directors adopted the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In 2015, CARB set targets for SANDAG to achieve a 7 percent per capita reduction compared to 2005 level emissions by 2020 and a 13 percent per capita reduction by 2035(CARB 2015). In March of 2018, CARB approved the proposed Target Update for the SB 375 targets tasking SANDAG to achieve a 15 percent and a 19 percent per capita reduction by 2020 and 2035, respectively (CARB 2018).

County of San Diego

General Plan Policies

The General Plan includes goals and policies within the Land Use Element and Conservation and Open Space Element that would encourage GHG reducing land use practices and activities throughout the unincorporated County. Within the Land Use Element, Goal LU-5 addresses climate change and land use by creating a land use plan that reduces emissions of GHGs to support state initiatives and promote public

health. Policy LU-5.3 would support this goal by preserving existing undeveloped and rural areas and provide carbon sequestration benefits. Within the Conservation and Open Space Element, Goal COS-15 promotes sustainable agriculture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health, including Policies COS-15.1, COS-15.2, and COS-15.3. Goal COS-17 promotes sustainable solid waste management (supported through Policies COS-17.1 and COS-17.5), Goal COS-18 promotes energy systems that reduce consumption of non-renewable resources and GHGs (supported through Policy COS-18.2), and Goal COS-20 promotes GHG reductions through governance and administration (supported through Policies COS-20.1, COS-20.2, and COS-20.4).

Climate Action Plan

In February 2018, the County Board of Supervisors adopted the *County of San Diego Climate Action Plan* (CAP) that included strategies and measures to reduce GHG emissions from the unincorporated County and County government operations. These strategies and measures were developed to reduce GHG emissions by 2020 and 2030, in line with the State's legislative GHG reduction targets through AB 32 and SB 32 and demonstrate progress toward the State's 2050 GHG reduction goal. In December 2018, as a result of the lawsuit filed against the County and the CAP, the San Diego County Superior Court issued a writ ordering the approval of the CAP and associated SEIR be set aside. In June 2020, this decision was upheld by the California Court of Appeal, Fourth District following the County's appeal of the San Diego County Superior Court decision and the County Board of Supervisors subsequently rescinded approvals of the CAP, SEIR and related approvals in September 2020. Through the holding of this decision, the County's CAP can no longer be considered the applicable plan in the unincorporated County for the purpose of reducing GHG emissions, and consistency with the CAP cannot be used as a determination of significance until such a time as it is reapproved in compliance with CEQA. However, GHG reduction strategies and measures included in the CAP continue to be implemented pending preparation of an updated CAP for consideration by the County Board of Supervisors.

Green Building Incentive Program

The County of San Diego's Green Building Incentive Program is designed to promote the use of resource efficient construction materials, water conservation, and energy efficiency in new and remodeled residential and commercial buildings. The program offers incentives of reduced plan check turnaround time and a 7.5 percent reduction in plan check and building permit fees for projects meeting program requirements.

Construction and Demolition Recycling Ordinance

The Construction and Demolition Debris Ordinance is designed to divert debris from construction and demolition projects from the landfill disposal in the unincorporated County. The ordinance requires that 90 percent of inerts and 70 percent of all other construction materials from a project be recycled. In order to comply with the ordinance, a Construction and Demolition Debris Management Plan must be submitted and a fully refundable Performance Guarantee must be paid prior to building permit issuance.

Strategic Plan to Reduce Waste

The County of San Diego Strategic Plan to Reduce Waste is designed to reduce waste sent to landfills. The plan includes 15 programs and policies that focus on different waste types and sources, such as reducing food and other organic waste generated from residential and commercial uses and sets a 75 percent waste diversion target by 2025.

Landscape Ordinance

The County of San Diego's Landscaping Ordinance was adopted in accordance with the State's Model Water Efficient Landscape Ordinance (MWELO), which establishes water efficiency standards for new and existing landscapes. The County's ordinance applies to new construction for which the County issues a building permit or a discretionary review where the aggregate landscaped area is 500 square feet or more to obtain outdoor water use authorization. For those projects between 500 and 2,500 square feet, the County has a more streamlined process called the Prescriptive Compliance Option. All landscape areas are subject to a Maximum Applied Water Allowance (MAWA), which sets an upper limit of allowable water use per landscape area.

2.6.2.4 Alpine CPU Policies

Specific Alpine CPU goals and policies in the Land Use, Mobility, and Conservation and Open Space Elements relevant to impacts and resources related to greenhouse gases are summarized below.

Land Use Element

Goal LU-6 states that the built environment should be in balance with the natural environment, scarce resources, natural hazards, and the unique local character. Policies LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, and LU-6.7 support this goal by describing how development should be designed, sited, and implemented. Policies LU-6.1 and LU-6.7 require the protection of natural resources and creation of open space. Policies LU-6.2, LU-6.3, LU-6.4, and LU-6.6 require that projects and subdivisions be designed to consolidate the project footprint and use sustainable development practices (including incorporation of natural features) as well as maintain low-density land uses in areas with sensitive natural resources.

Goal LU-7 recommends analyzing a Transfer of Development Rights (TDR) Pilot Program, and Policy LU-7.1 specifically implements a TDR Pilot Program in support of this goal. This program would promote environmental sustainability by directing density toward planned growth areas within Village boundaries to reduce the generation of VMT and GHG emissions.

Mobility Element

Goal M-1 works to support a multi-modal transportation system that serves the general convenience and safety of Alpine citizens and enhances the beauty and quality of the built environment. This goal would be supported by policies that result in improved air quality through reduced vehicle trips on roadways including Policy M-1.1 through M-1.9, which support the development of housing and services near existing and planned transit stops; encourage traffic calming and efficient circulation design improvement throughout the CPA; and promote bicycling, walking, and taking transit and efficient and safe modes of transportation. Policy M-1.6 encourages the replacement of all trees lost during road construction/renovation project, which would increase carbon sequestration and reduce carbon lost during roadway projects.

Conservation and Open Space Element

Goal COS-1 promotes management of valuable resources, natural and man-made, and prevention of resource destruction and wasteful exploitation. Policy COS-1.1 supports this by promoting conservation education in community schools.

Goal COS-2 encourages planting of trees to absorb $C0_2$ and provide air quality benefits through runoff retention. Policy COS-2.1 recommends exploring incentives and tax breaks to meet this goal and consideration of support for removal of non-native vegetation.

2.6.3 Analysis of Project Effects and Determination as to Significance

Global climate change is inherently cumulative; thus, the proposed project's impact on climate change is addressed only as a cumulative impact.

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." Section 15064.4 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Under Appendix G of the State CEQA Guidelines, implementing a project would result in a cumulatively considerable contribution to climate change if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or
2. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Section 15064.4 of the CEQA Guidelines does not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions. Section 15064.7(c) states that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." Several agencies throughout the state, including multiple air districts, have drafted and/or adopted varying thresholds approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. However, no thresholds of significance or guidelines for general use within the County have been adopted by CARB, the County, or SDAPCD.

In the absence of an adopted numeric threshold, the significance of the proposed project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples

of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions." Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.

As described above, the California Global Warming Solutions Act of 2006 (AB 32) established a target of reducing GHG emissions to 1990 levels by 2020. SB 32 (2016) authorized CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. The California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 62 Cal. 4th 204 ("Newhall Ranch" case) states that "a lead agency might assess consistency with Assembly Bill 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities." The Court further states that "to the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan and adopted by the Air Board or other state agencies, a lead agency could appropriately rely on their use as showing compliance with 'performance based standards' adopted to fulfill 'a statewide plan for the reduction or mitigation of greenhouse gas emissions.' (Guidelines, § 15064.4, subds. (a)(2), (b)(3); see also id., § 15064, subd. (h)(3) [determination that impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including 'plans or regulations for the reduction of greenhouse gas emissions'].)"

CARB's 2017 Scoping Plan is intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32 and provides examples of local actions that can be implemented to support the State's climate goals. In addition, as part of its discussion about different viable thresholds for analyzing GHG emissions associated with projects, the 2017 Scoping Plan states, "Absent conformity with an adequate geographically-specific GHG reduction plan as described in the preceding section above, CARB recommends that projects incorporate design features and GHG reduction measures, to the degree feasible, to minimize GHG emissions" (CARB 2017). Therefore, if a project demonstrates consistency with the State's overall strategy and ability to meet the 2030 target as laid out in the 2017 Scoping Plan, then the project's incremental contribution to climate change would be less than significant. Based on the foregoing, the County has determined that the proposed project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, i.e., emissions reduction measures discussed within CARB's 2017 Scoping Plan. The determination of consistency with the 2017 Scoping Plan including the methodology to identify consistency, is described further in Section 2.6.3.2, *Issue 1: Generate GHGs That May Have a Significant Impact on the Environment*.

2.6.3.1 Analysis Methodology

As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions from County guidelines or SDAPCD, the methodology for evaluating the Alpine CPU's impacts related to GHG emissions focuses on its consistency with statewide plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency is the sole basis for determining the significance of the Alpine CPU's GHG-related impacts on the environment.

Emissions of GHGs were estimated in accordance with Section 15064.4 of the CEQA Guidelines. The severity of potential impacts related to the GHG emissions caused by the increase in development potential above allowable General Plan buildout was assessed based on the proposed project's total increase in development above existing conditions (set to a base year of "on-the-ground" development in

2012, consistent with SANDAG modeling).[1] Potential impacts from buildout of the Alpine CPU were determined based on two scenario buildout years in 2030 and 2050, relative to the development of the General Plan buildout for the same years. The 2030 impact determination assumes full buildout of the Alpine CPU by that year, consistent with SB 32. The same analysis was performed for the buildout of General Plan land uses within the Alpine CPA for comparison. Since the 2017 Scoping Plan identifies a pathway to achieve the statewide 2030 target, consistency with Scoping Plan measures would determine if a project or plan impact would be cumulatively considerable in 2030. This analysis of buildout in 2030 was provided to illustrate anticipated emissions from allowable Alpine CPU growth by the SB 32 milestone year. However, as indicated by existing growth trends in the Alpine CPA (see Chapter 1.0, *Project Description*) and the projected buildout timeline for allowable Alpine CPU buildout, it would likely take longer than 10 years for buildout to occur. Emissions estimates in 2050 also assume full buildout of both the Alpine CPU and General Plan, consistent with the Alpine CPU horizon year. However, the 2017 Scoping Plan does not identify specific actions that should be taken to achieve the 2050 goal. While consistency with Scoping Plan measures would assist in substantially reducing statewide emissions and set the state on a pathway toward the 2050 emissions reduction goal, the Scoping Plan measures would not be adequate to achieve the statewide 2050 goal.

Consistent with CEQA Guidelines Section 15064.4, the analysis also calculates the amount of GHG emissions that would be attributable to the Alpine CPU and General Plan buildout, and the net change in GHG emissions between the two scenarios. GHG emissions associated with the Alpine CPU would be generated during construction and operation. Construction activities associated with allowable development construction would result in the generation of GHG emissions from the use of heavy-duty off-road construction equipment, delivery trucks associated with materials transport, and vehicle use during worker commute. Operations of plan buildout would result in mobile-source GHG emissions from vehicle trips, area-source emissions from the operation of landscape maintenance equipment, energy use emissions from consumption of electricity and natural gas, water-related energy consumption associated with water use and the conveyance and treatment of wastewater, and waste-generated emissions from the transport and disposal of solid waste. Emissions were modeled using the California Emissions Estimator Model (CalEEMod) Version 2016.2.3 and CARB's EMFAC2017 model with the application of the SAFE Rule emissions adjustment factors. The significance of the proposed project's GHG impacts is not based on the quantitative amount of GHG emissions resulting from buildout, and instead is based on the consistency of the proposed project to CARB's 2017 Scoping Plan, assessed qualitatively.

CalEEMod provides estimated emissions of criteria air pollutants and GHG emissions using user defined inputs and default data when local or project-specific data are not available. The primary inputs for emissions estimates are land uses associated with a project. As described previously in Chapter 1, *Project Description*, land use data for the proposed project are available at the community plan level (i.e., allowable buildout of dwelling units for residential land uses and acreage for commercial uses). The total single-family and multi-family dwelling units were used to estimate emissions associated with residential uses. To provide the most representative estimates for commercial uses, the total building square footage is needed to input into CalEEMod. Thus, for the purposes of the modeling of GHG emissions (as well as the modeling of criteria air pollutant emissions provided in Chapter 2.3 *Air Quality*, and energy consumption provided in Chapter 2.15, *Energy*), the acreage for these uses was converted to square feet. The anticipated

[1] To determine VMT for inventories and projections, SANDAG provides jurisdiction-specific VMT data for a base year and requested horizon year(s) depending on the jurisdiction's planning milestone years. The base year VMT data for the unincorporated County that most closely represents actual conditions is the 2012 base year, consistent with the Series 13 base year. This base year is used as the overall baseline for this analysis as it represents the most available dataset reflective of all existing land uses and emissions sources and is most closely calibrated in SANDAG's model.

square footage of buildout of commercial uses through the implementation of the proposed project and allowable General Plan buildout were estimated based on the total acreage of commercial, and mixed-use land uses, multiplied by the existing floor area ratio (FAR) of similar uses in the Alpine CPA. The existing FAR was estimated based on a reasonable rate of commercial buildout on existing sites in the Alpine CPA. An additional adjustment was made for estimated development on parcels zoned "Village Core Mixed Use (C-5)" to account for the potential mix of uses on these sites (i.e., estimated retail land use was reduced to account for additional residential uses developed on the site). This mixed-use adjustment assumed that 70 percent of the square footage on mixed-use sites would be occupied by commercial uses. This conversion was prepared by Chen Ryan and Associates (Chen Ryan 2020), and a detailed description of this methodology is provided in Appendix G. For consistency with other Alpine CPU SEIR sections, commercial land uses within this section are described based on acreage.

2.6.3.2 Issue 1: Generate GHG Emissions That May Have a Significance Impact on the Environment

Guidelines for the Determination of Significance Analysis

As described previously in Section 2.6.3, the potential impacts from the proposed project's GHG emissions were evaluated relative to consistency with the 2017 Scoping Plan.

CARB's 2017 Scoping Plan

The 2017 Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as cap-and-trade. There are multiple state laws, regulations, and policies the Alpine CPU would need to comply with, including:

- California Renewables Portfolio Standard, SB 350, and SB 100
- California Code of Regulations Title 24, Building Standards Code
- AB 1109 (Lighting Efficiency and Toxics Reduction Act)
- AB 1493 (Pavley Regulations)
- Executive Order S-01-07 (Low Carbon Fuel Standard)
- Advanced Clean Cars Program and Low-Emission Vehicle regulations
- SB 375 (regional targets for reducing passenger vehicle GHG emissions)
- SB X7-7 (Water Conservation Act of 2009)
- California Integrated Waste Management Act of 1989 and AB 341 (statewide goal for 75 percent disposal reduction)

In addition to compliance with statewide laws and regulations, consistency with the 2017 Scoping Plan would be determined through implementation of applicable project-level GHG reducing actions. As briefly described in Section 2.6.2.2, CARB provides 43 project-level GHG reduction measures in Appendix B, *Local Action*, of the 2017 Scoping Plan. The 43 measures, herein referred to as Scoping Plan measures, provide "examples of potentially feasible mitigation measures that could be considered for individual projects under CEQA when the local jurisdiction is the lead agency" (CARB 2017).

The examples of measures provided in the Scoping Plan are used in this analysis as best management practices (BMPs) for establishing a threshold of significance for the Alpine CPU. These BMPs would require future projects in the Alpine CPA that are subject to the discretionary review process to determine potential impacts from emissions of GHGs and consistency with applicable plans through consistency with CARB's 2017 Scoping Plan. These BMPs are measures that would minimize the GHG emissions associated with development under the proposed project. By showing consistency with the BMPs, development would comply with the State's overall strategy and ability to meet future reduction targets as laid out in the 2017 Scoping Plan. Thus, compliance with the State's future reduction targets would result in a less than significant incremental contribution to climate change. However, consistency with the 2017 Scoping Plan can only be used to determine a less than significant impact for a 2030 horizon year. The 2017 Scoping Plan notes that the identified measures to meet California's 2030 reduction target would not be adequate to meet the 2050 reduction goal. Thus, even if consistent with the Scoping Plan measures, a project would still generate GHG emissions that would be cumulatively considerable for a 2050 horizon year.

Appendix B, *Local Action*, provides a list of 43 project-level GHG reduction measures. The feasibility of implementing these project-level measures varies by jurisdiction, location, and regional climate. For this reason, CARB provides only generalized measures that should be further developed by local agencies to match local policies to the extent feasible, and apply only measures that would be feasible within the climate (e.g., requirements for improving energy efficiency in buildings would change between climates. Areas with cold winters may apply insulation or hearth measures that would not be applicable in warmer climates.) From the project-level Scoping Plan measures, BMPs were developed based on feasibility in the San Diego region. These BMPs expand the Scoping Plan measures to include regionally specific activities, feasible construction or operational requirements that have been included in recent CEQA documents, and regulations and requirements applied in similar air districts (i.e., South Coast Air Quality Management District [SCAQMD] and Sacramento Metropolitan Air Quality Management District [SMAQMD]). This methodology for determining BMPs based on Scoping Plan measures is consistent with the methodology used by SMAQMD in developing BMPs for use in the air districts alternative thresholds for determining significance for GHGs (SMAQMD 2020). The analysis presented herein translates recommended project-level measures from Appendix B of the Scoping Plan into BMPs to assign "performance based standards" consistent with the Court's recommendation in *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 62 Cal. 4th 204 ("Newhall Ranch" case) and CEQA Guidelines Section 15064.4(a)(2). The Newhall Ranch case states that "a lead agency might assess consistency with Assembly Bill 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities." The Court further states that "to the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan and adopted by the Air Board or other state agencies, a lead agency could appropriately rely on their use as showing compliance with 'performance based standards' adopted to fulfill 'a statewide plan for the reduction or mitigation of greenhouse gas emissions.' (Guidelines, § 15064.4, subds. (a)(2), (b)(3); see also id., § 15064, subd. (h)(3) [determination that impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including 'plans or regulations for the reduction of greenhouse gas emissions'].)" A summary of the BMPs applicable to project-level implementation in the Alpine CPA and the related Scoping Plan measures is provided in Table 2.6-4. Additional determination of measures feasibility is provided in Appendix E.

Table 2.6-4. Project-Level Best Management Practices Consistent with CARB Scoping Plan Measures

Best Management Practice	Description	Applicable Project Types
Construction-Related BMPs		
BMP-1: Idling Restrictions for Construction Equipment	All on- and off-road diesel equipment shall not idle for more than 5 minutes while on site. Signs shall be posted in the designated queuing areas and/or job sites to inform drivers and operators of the 5-minute idling limit. Implementation of these measures shall be required in the contract the project applicant establishes with its construction contractors.	All construction activities.
BMP-2: Off-Road Equipment Emission Standards	All diesel-powered off-road equipment used in construction shall meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Implementation of this measure shall be required in the contract the project applicant establishes with its construction contractors.	All construction activities.
BMP-3: Alternative Fuels for Diesel-Powered Construction Equipment	Only RD fuel should be used in diesel-powered construction equipment. RD fuel must meet the following criteria: ▪ Meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ Be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ Contain no fatty acids or functionalized fatty acid esters; and ▪ Have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. Implementation of this measure shall be required in the contract the project applicant establishes with its construction contractors.	All construction activities.
BMP-4: Electrification of Power Tools and Temporary Office Buildings	Instead of using fossil fuel-based generators for temporary jobsite power, grid-sourced electricity from the local utility shall be used to power tools (e.g., drills, saws, nail guns, welders) and temporary office buildings. This measure is required during all construction phases except site grubbing; site grading; and the installation of electric, water, and wastewater infrastructure. This measure shall be implemented during building demolition, the framing and erection of new buildings, all interior work, and the application of architectural coatings. Electrical outlets shall be placed in accessible locations throughout the project area. Contractors shall coordinate with the utility to activate a temporary service account prior to proceeding with	All land development construction. This measure would not apply to the construction of projects, infrastructure, or buildings that will not be connected to the electrical grid

Best Management Practice	Description	Applicable Project Types
	construction. Implementation of this measure shall be required in the contract the project applicant establishes with its construction contractors.	when they are completed and operational.
BMP-5: Construction Worker Commute Trips	Implement a program supportive of SANDAG iCommute that incentivizes workers to carpool, use EVs, or use public transit to commute to and from the construction site. At minimum, the program shall include a virtual or real "ride board" for workers to organize carpools and reimburse workers for any expenses they incur from using local public transit to commute to and from the construction site. The program may also include the following features, if feasible: ▪ Provide preferential parking to carpool vehicles, vanpool vehicles, and EVs; and ▪ Schedule work shifts to be compatible with the schedules of local transit services. Implementation of these measures shall be required in the contract the project applicant establishes with its construction contractors.	All construction activities.
BMP-6: construction Waste Reduction, Disposal, and Recycling	All construction activities shall implement waste reduction, disposal and recycling strategies in accordance CALGreen. In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.	Construction and demolition of all residential and non-residential buildings.
Building-Related BMPs		
BMP-7: Energy Efficiency and Solar Photovoltaic Systems for Single Family Residential Buildings	New single-family residential buildings construction within the Alpine CPA shall be designed consistent with the energy efficiency performance standards set forth in Tier 2 of the 2019 CALGreen, Section A4.203.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software.	New single-family residential buildings.
BMP-8; Energy Efficiency and Solar Photovoltaic Systems for Multi-Family Residential Buildings	New multi-family residential buildings constructed within the Alpine CPA shall be consistent with the energy efficiency performance standards set forth in Tier 1 of 2019 CALGreen, Section A4.203.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software.	New multi-family residential buildings that are three stories or less.
BMP-9: Energy Efficiency of Non-Residential Buildings	Newly constructed non-residential buildings shall be designed consistent with Tier 1 of CALGreen Section A5.203.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.	New non-residential buildings and new residential buildings exceeding four stories.

Best Management Practice	Description	Applicable Project Types
BMP-10: Cool Roofs	Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of CALGreen Section A5.106.11.2.	All new residential and non-residential buildings.
BMP-11: Water Efficiency and Conservation	Newly developed buildings shall comply with requirements for water efficiency and conservation as described in CALGreen Divisions A4.3 and A5.3.	All new residential and non-residential buildings.
BMP-12: Natural Gas Outlets for Residential Backyards and Common Outdoor Activity Areas	Natural gas connections must be provided in all residential backyards and within the common outdoor activity areas of multi-family land uses. Natural gas connections are only required in areas served by natural gas infrastructure.	Single family homes with backyards and multi-family land uses with common outdoor activity areas in locations where natural gas service is provided.
BMP-13: Outdoor Electrical Receptacles	Multiple electrical receptacles shall be included on the exterior of newly constructed non-residential buildings and accessible for purposes of charging or powering electric landscaping equipment and providing an alternative to using fossil fuel-powered generators. The electrical receptacles shall have an electric potential of 100 volts. There should be a minimum of one electrical receptacle on each side of the building and one receptacle every 100 linear feet around the perimeter of the building.	All electrified non-residential buildings.
BMP-14: Parking Lot Shading	New outdoor parking lots for multi-family and non-residential buildings shall include trees and/or solar canopies designed to result in 50 percent shading of parking lot surface areas.	New multi-family and non-residential buildings with outdoor, on-site parking lots.
Transportation-Related BMPs		
BMP-15: Limit Parking Capacity to Meet On-Site Demand	Provide no more on-site parking spaces than necessary to accommodate the number of employees working at a project site and/or the number of residents living at a project site, as determined by the project size and design.	Office, industrial, and multi-family residential land uses.
BMP-16: Electric Vehicle Parking at New Single-Family Residential Buildings	Newly constructed single-family residential buildings shall install at least one EVSE parking space in each unit. Each EVSE shall include the installation of a listed raceway, associated overcurrent protective device and the balance of a dedicated 208/240-volt branch circuit rated at 40amperes minimum, and EV charging equipment. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or unit subpanel and shall terminate into a listed cabinet, box	New single-family residential buildings.

Best Management Practice	Description	Applicable Project Types
	or at the location of the EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity for a 40-ampere minimum dedicated branch circuit. All electrical circuit components and EVSE, including a receptacle or box with a blank cover, related to this section shall be installed in accordance with the California Electrical Code.	
BMP-17: Electric Vehicle Parking and Charging in New Multi-Family Residential Buildings	Newly constructed multifamily residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of 2 spaces to be installed with EVSE for buildings with 2–10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-Volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices.	New multi-family residential buildings of three stories or less.
BMP-18: Electric Vehicle Parking and Charging in New Non-Residential Buildings	Newly constructed non-residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of 2 spaces to be installed with EVSE for buildings with 2–10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-Volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices.	New non-residential buildings and all residential buildings exceeding four stories.
BMP-19: Preferential Parking for High-Occupancy Vehicles and Zero Emission Vehicles	Non-residential land uses with 20 or more on-site parking spaces shall dedicate preferential parking spaces to vehicles with more than one occupant and Zero Emission Vehicles (including battery electric vehicles and hydrogen fuel cell vehicles). The number of dedicated spaces should be no less than two spaces or 5 percent of the total parking spaces on the project site, whichever is greater. These dedicated spaces shall be in preferential locations such as near the main entrances to the buildings served by the parking lot and/or under the shade of a structure or trees. These spaces shall be clearly marked with signs and pavement markings. This measure shall not be implemented in a way that prevents compliance with requirements in the California Vehicle Code regarding parking spaces for disabled persons or disabled veterans.	All non-residential land uses with off-street parking.
BMP-20: Bicycle Parking at Retail and Commercial Buildings	Provide adequate, safe, convenient, and secure on-site bicycle parking racks at retail and commercial buildings. Bicycle parking racks shall be permanently anchored, be located in a convenient location within 200 feet of the primary visitor's entrance, and be easily visible. The number of bike parking spaces shall be a minimum of 15 percent of new visitor motorized vehicle parking spaces (rounded up to the nearest whole number). At minimum, there should be one two-bike capacity rack.	New commercial and retail land uses.
BMP-21: On-Site Amenities for Bicycles at Multi-Family Residential Buildings	Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects. The bicycle parking area shall be under a roof and in a locked area that is only accessible by residents. Bicycle parking facilities should be designed in a manner that	New multi-family residential land uses.

Best Management Practice	Description	Applicable Project Types
	provides adequate space for all bicycle types including e-bikes, tandems, recumbent bikes, and cargo bikes, as well as bike trailers. Alternatively, a separate bicycle storage area can be included in the design of each dwelling unit near the main entrance to each dwelling unit. The total bicycle storage capacity on the project site shall be sufficient to accommodate a number of bikes that is equivalent to the number of residents for which the project is designed as well as one bike trailer for every dwelling unit on the project site. The project should also include elevators large enough to accommodate bikes and a common space with a shared bike tool station and compressor air pump for inflating tires.	
BMP-22: On-Site Bicycle Amenities for Places of Employment	All newly constructed places of employment shall include amenities for employees who commute by bicycle including a shower and changing room, as well as a secure bicycle parking area. The bicycle parking area shall be under a roof and in a locked area that is only accessible by employees. Bicycle parking facilities should be designed in a manner which provides adequate space for all bicycle types, including e-bikes, tandems, recumbent bikes, and cargo bikes, as well as bike trailers. The project should also include a common space with a shared bike tool station and compressor air pump for inflating tires.	New commercial and industrial uses.
BMP-23: Connections to Nearby Bicycle Network	The project site shall be designed to create safe paths of travel to building access points. At a minimum this shall include pavement markings to guide cyclists and signs alerting passenger vehicles of bicycle pathways. This may also include separate ingress and egress points for bicycles than for cars. The project applicant shall install signage that directs cyclists to any Class I, II, III, or IV bike routes within a half-mile of the site. The project applicant shall also post a map near the bike parking area that shows the locations of bike routes relative to the project site and the best route to reach them. If there are no bike routes within a half-mile of the site, then no signage or map is required.	All land use types except single-family residential.
BMP-24: Bike Routes	Projects that involve the construction of new local roadways or roadway extensions, either as the project itself or as off-site improvements, shall also include the construction a Class I, II, or IV bikeway along the same route. The bike routes must be constructed according to the design standards of the County.	All non-highway roadway construction projects.

Notes: BMP = Best Management Practice; CALGreen = California Green Building Code; CARB = California Air Resources Board; CFR = Code of Federal Regulations; CPA = community plan area; EPA = U.S. Environmental Protection Agency; EV = electric vehicle; EVSE = electric vehicle service equipment; RD = renewable diesel; SANDAG = San Diego Association of Governments.
All Scoping Plan measures not included within a BMP were determined to be infeasible in the Alpine CPA. The determination of Scoping Plan measure feasibility and infeasibility is included in Appendix E.
Source: CARB 2017; Analysis performed by Ascent Environmental in 2020.

It should be noted that the BMPs listed in Table 2.6-4 would represent actions in addition to current activities and programs that the County is implementing that would reduce GHG emissions from existing and future development. These include, but are not limited to:

- **Community Choice Energy:** The County is currently in the process of identifying a regional community choice energy (CCE) program in which to participate, which would allow for the County to purchase and/or generate renewable energy and provide cleaner power supplies to customers in the unincorporated County.
- **Permit Streamlining:** Through the discretionary review process, the County has provided streamlining benefits to projects that are consistent with the General Plan and implement sustainability measures specific to the proposed use that are identified in the CAP. In response to the Court's decision to uphold the ruling to set aside the CAP, the County has continued to encourage development projects to implement applicable GHG reducing activities in project design through the discretionary review process. These measures include encouraging the installation of tankless or electric water heaters and requiring low-flow water fixtures, and planting trees in residential developments, and transportation strategies to reduce single-occupancy vehicle trips in non-residential developments.
- **Agricultural Easements:** The County has an agricultural conservation plan known as the Purchase of Agricultural Easement (PACE) Program. The PACE Program allows willing agricultural property owners to receive compensation for placing a perpetual easement on their property that limits future uses to agriculture. This activity reduces the conversion of agricultural properties to residential or other uses, limiting the removal of carbon sequestering agricultural and suburban sprawl.
- **Strategic Plan to Reduce Waste:** The County's Strategic Plan to Reduce Waste includes the implementation of programs that target waste diversion in new developments by providing necessary waste receptacles to encourage recycling, and informational material to encourage composting and waste reduction.
- **Landscape Ordinance:** The County's Landscape Ordinance requires new development to demonstrate water efficient landscapes, consistent with the County's Water Efficient Design Manual, that reduce the amount of water consumed outdoors.

In demonstrating consistency with the 2017 Scoping Plan, future projects in the Alpine CPA would be required to implement all applicable BMPs listed in Table 2.6-4.

2.6.3.3 Impact Analysis

The BMPs mentioned above address each of these categories as well as construction activity. GHG emissions generated by the Alpine CPU and General Plan were estimated for informational purposes to provide context for the potential change in GHG emissions from the allowable uses under the Alpine CPU compared to the previously allowable General Plan land uses.

Existing operational emissions of GHGs were estimated for existing "on-the-ground" activities. The existing land uses were based on a 2012 baseline year, which is reflective of the best available land use data for the Alpine CPA and consistent with the base year VMT modeling from SANDAG's Series 13 estimates. This base year data represents the best available land use data for the Alpine CPA and is consistent with the base year VMT modeling from SANDAG's Series 13 estimates. This base year data is considered best available because it is calibrated by SANDAG based on actual conditions reflected by

existing land uses, travel surveys, and state of the transportation network. A summary of the existing operational GHG emissions for the Alpine CPA are shown in Table 2.6-5.

Table 2.6-5. GHG Emissions Generated under Existing Conditions in the Alpine CPA ($MTCO_2e$ per year)

Source	GHG Emissions ($MTCO_2e$ per year)
Area	10,021
Building Energy	22,376
Mobile (Vehicular)	142,661
Solid Waste	3,535
Water and Wastewater	3,590
Total	**182,184**

GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent
Source: Data modeled by Ascent Environmental in 2020. See Appendix D.

Short-term construction-generated GHG emissions were estimated using the CalEEMod, Version 2016.3.2. Because specific construction phasing and intensity are unknown for allowable future developments in the Alpine CPU, construction phasing, scheduling, and equipment modeled were based on default values generated for the allowable land uses. This analysis presents a potential scenario under which construction could occur, while acknowledging construction projects may vary in intensity and size, and full buildout of the allowable Alpine CPU may not occur within the anticipated timeline (i.e., by 2050). Total GHG emissions associated with construction were summed over the estimated construction schedule between 2020 and 2050. Construction emissions were amortized over 30 years, consistent with the potential project buildout in 2050, in accordance with SCAQMD guidance for estimating GHG emissions (SCAQMD 2008).

Operations-related emissions of GHGs were estimated for area sources (e.g., landscape maintenance equipment), energy use (i.e., electricity and natural gas consumption), water use, wastewater generation, solid waste generation, and mobile sources. The analysis was provided assuming two separate buildout scenarios. Full buildout of the Alpine CPU in 2030 was prepared to determine impacts consistent with the 2017 Scoping Plan, which identifies measures that would be implemented to meet the State's 2030 GHG reduction target. An additional scenario was analyzed consistent with the Alpine CPU planning horizon in 2050, for which the 2017 Scoping Plan does not provide measures to adequately reduce GHG emissions to meet the State's 2050 emission reduction goal. GHG emissions generated by buildout of the General Plan were prepared for both buildout scenarios in 2030 and 2050 to provide context for the potential change in emissions generated by the allowable Alpine CPU buildout.

Emissions from area and energy sources were estimated using land use data provided by the County and estimated in CalEEMod Version 2016.3.2. Data provided by the County includes estimates for allowable buildout of single- and multi-family residential units, and estimated non-residential acreage at buildout based on reasonable and foreseeable building size consistent with existing developments and proposed commercial acreage included in the Alpine CPU. Additional detail on the methodology and assumptions used to determine dwelling unit and acreage estimates at buildout are provided in Chapter 1, *Project Description*. As noted in Section 2.6.3.1, the non-residential acreage was converted to square footage for analysis in CalEEMod. Default values were used where Alpine CPU—specific information was not available (e.g., energy consumption or landscaping equipment usage). Adjustments were made in the model to reflect the following regulations that have become effective but are not accounted for in CalEEMod:

- Default building energy consumption rates were adjusted to account for energy efficiency improvements from the 2019 California Energy Code (CCR Title 24, Part 6), assuming a 53 percent reduction in residential energy consumption and a 30 percent reduction in non-residential energy consumption compared to the 2016 Title 24 regulations built into CalEEMod (CEC 2018).
- Utility provider electricity emissions factors for San Diego Gas and Electric (SDG&E) were adjusted to reflect legislative requirements (SB 100) to increase renewable electricity sources by 60 percent by 2030 and 100 percent by 2045.

Operations-related mobile-source GHG emissions were modeled based on the estimated level of VMT generated by residents and employees.

- VMT estimates were provided by the SANDAG Series 13 Activity Based Model forecasts for the General Plan and Alpine CPU buildouts in 2050. GHG emissions from mobile sources were estimated using emission factors for the San Diego Air Basin (SDAB) from CARB's 2017 Emissions Factors model (EMFAC2017). Adjustment factors provided by CARB were applied to EMFAC2017 to account for anticipated future changes in mobile emission factors as a result of the SAFE Rule.

As noted previously, GHG emissions generated from construction and operational activities were estimated for the allowable General Plan and the Alpine CPU for full buildout years in 2030 and 2050. While full buildout of the Alpine CPU is anticipated by 2050, emissions were also estimated for a buildout year of 2030 in accordance with the SB 32 target year. These emissions estimates incorporate relevant local and state requirements, including 2019 Title 24 Building Efficiency Standards for building operations with which all new projects would be compliant. GHG emissions from buildout of the General Plan within the Alpine CPA and Alpine CPU are summarized in Table 2.6-6, below by source.

As shown in Table 2.6-6, the Alpine CPU would result in an increase in GHG emissions under both an assumed 2030 or 2050 buildout. The Alpine CPU would generate an estimated 285,203 metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2030 and 260,894 $MTCO_2e$ in 2050. This would be an increase of 35,454 $MTCO_2e$ in 2030 and 35,539 $MTCO_2e$ in 2050 over General Plan buildout in the same years. Buildout of the Alpine CPU would also lead to an increase in GHG emissions over existing conditions of 103,019 $MTCO_2e$ by 2030 and 78,711 $MTCO_2e$ by 2050.

The threshold of significance for the Alpine CPU to determine impacts associated with the generation of GHG emissions is level of consistency with the 2017 Scoping Plan through implementation of all feasible BMPs. Through implementation of BMPs, development projects would demonstrate consistency with the 2017 Scoping Plan, and their associated GHG emissions would not be considered cumulatively considerable in 2030. For the purposes of this threshold, the application of all feasible BMPs to future projects in the Alpine CPU would result in project-level GHG emissions that would not be considered to have a significant impact on the environment in 2030. However, none of these BMPs are identified in Alpine CPU policies or requirements for development. Consistency with the 2017 Scoping Plan is an impact threshold specific to GHG-related impacts of the Alpine CPU. As such, the BMPs were not included as policies within the Alpine CPU because they are not required for the implementation of projects consistent with or proposing less growth than the General Plan, which are addressed by the 2011 General Plan EIR mitigation measures. Because the policies included in the Alpine CPU are intended to be applicable to the proposed project and all project alternatives (some of which would propose development less than or consistent with the allowable General Plan buildout), these BMPs were not included as policies. Thus, the operation and construction activities associated with the Alpine CPU buildout by 2030 would not be consistent with the 2017 Scoping Plan. In addition, the proposed project would lead to an increase in GHG emissions both with respect to

Table 2.6-6. GHG Emissions Associated with the General Plan and Alpine CPU ($MTCO_2e$ per year)

Source	General Plan[1]	Alpine CPU	Net Change (Proposed Project – General Plan)	Net Change (Proposed Project – Existing Conditions)
2030 Buildout				
Area	16,227	19,300	+3,073	+9,279
Building Energy	38,561	40,915	+2,354	+18,538
Mobile (Vehicular)	178,489	206,921	+28,432	+64,260
Solid Waste	6,998	7,601	+602	+4,065
Water and Wastewater	7,849	8,414	+565	+4,824
Amortized Construction	1,625	2,053	+428	+2,053
Total	249,749	285,203	**+35,454**	**+103,019**
2050 Buildout				
Area	16,227	19,300	+3,073	+9,279
Building Energy	27,923	28,850	+927	+6,474
Mobile (Vehicular)	164,514	190,719	+26,205	+48,059
Solid Waste	6,998	7,601	+602	+4,065
Water and Wastewater	4,947	8,465	+3,519	+4,875
Amortized Construction	4,747	5,959	+1,212	+5,959
Total	**225,355**	**260,894**	**+35,539**	**+78,711**

Note: CPA = community plan area; CPU = Community Plan Update; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent

[1] Provides estimated GHG emissions associated with allowable General Plan buildout in the Alpine CPA only.

Totals may not add exactly due to rounding.

Source: Data modeled by Ascent Environmental in 2020. See Appendix D.

Notes: Emissions from industrial sources were modeled in separate CalEEMod files to show no increase in industrial uses beyond existing conditions. Details are shown in Appendix D.

existing conditions and General Plan buildout of the Alpine CPA. The BMPs developed from the Scoping Plan would reduce emissions from all emissions sources associated with proposed land uses in the Alpine CPU. In the future, an updated Climate Action Plan adopted by the County may incorporate Alpine CPU buildout in its covered activities, in which case the CAP may be used in the cumulative impacts analysis of those projects as provided in CEQA Guidelines section 15183(b)(2).

However, notwithstanding application of BMPs to CPU buildout, the proposed project would lead to an increase in VMT that is inconsistent with the County's VMT significance threshold of 15 percent below existing average VMT in the unincorporated County. This threshold was set consistent with OPR guidelines to support state VMT reduction targets and the urban regional targets for GHG emissions reductions established under SB 375. In its document *California Air Resources Board 2017 Scoping Plan-*

Identified VMT Reductions and Relationship to State Climate Goals, CARB assessed VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve state climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB found that per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall, per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve state climate goals. Because the proposed project would not achieve reduced VMT consistent with state goals and does not include BMPs consistent with the 2017 Scoping Plan, this impact would be **potentially significant**.

The County recognizes that the ability of a project to meet GHG targets beyond 2030 is unknown and cannot be known because these targets have not been adopted by the State legislature; CARB's 2017 Scoping Plan does not explicitly outline how any post-2030 targets would be met; and, further, attainment would at least be partially reliant on potential new regulations and/or potential new technologies that would be adopted and implemented in the future. It is unlikely that a project could meet long-term GHG efficiency aspirations, such as the target in EOs S-3-05 and B-30-15 of 80 percent below 1990 GHG levels by 2050 without substantial statewide regulations, such as those that may result in more EVs in the vehicle fleet mix, more stringent energy efficiency standards for buildings, and an increase in the generation of renewable electricity. Even with the application of all feasible Scoping Plan measures, the Alpine CPU would still result in project-level emissions that could conflict with California's ability to meet 2050 GHG emissions reduction goals. In order to comply with this reduction goal, the Alpine CPU would need to implement GHG reduction measures that are not currently feasible or known at this time. Thus, the operation and construction activities associated with the Alpine CPU buildout by 2050, regardless of the application of Scoping Plan measures and BMPs, would potentially conflict with the statewide reduction goals by 2050. This impact would be potentially significant.

Federal, State, and Local Regulations and Existing Regulatory Processes

Federal and state regulations exist to reduce GHG emissions throughout the unincorporated County. There are no federal regulations that set GHG emissions targets applicable to the Alpine CPA; however, the proposed project is required to comply with state regulations that support GHG emission reduction targets to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. Development consistent with the land uses proposed under the Alpine CPU would be required to comply with Title 24, Part 6 energy efficiency standards. In addition to complying with the required energy efficiency standards for new developments, development under the Alpine CPU would be required to comply with Title 24, Part 11 *California Green Building Standards* (CALGreen), which includes mandatory and voluntary standards for new developments.

All projects within the Alpine CPA are required to comply with local SDAPCD rules and regulations. While these regulations are generally aimed at reducing emissions of criteria air pollutants, many would also result in complementary reductions in GHG emissions from new developments. These rules include Rule 67.0.1, which reduces volatile organic compounds (VOC) emissions from architectural coating application, Rule 50, which regulates visible emissions (some of which are considered GHGs) from construction activities and agricultural operations, and the County's Landscape Ordinance, which reduces outdoor water use.

Summary

Table 2.6-6 summarizes the net change in GHG emissions generated by the Alpine CPU buildout in 2030 and 2050 compared to the General Plan. The Alpine CPU would result in an approximate net increase of 35,454 $MTCO_2e$ in 2030 and 35,539 $MTCO_2e$ in 2050 beyond the General Plan buildout. Consistency with the 2017 Scoping Plan is used as the threshold to determine if emissions associated with the proposed project would be significant. The Alpine CPU does not include policies consistent with the BMPs shown in Table 2.6-4 and would not require the implementation of these project-level BMPs consistent with the 2017 Scoping Plan. These BMPs were not included as policies within the Alpine CPU because they would not have been required for the implementation of projects consistent with or proposing less growth than the General Plan. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. The proposed project would result in a **potentially significant** impact in 2030 from emissions of GHGs because the proposed project would not be consistent with the 2017 Scoping Plan (**Impact-GHG-1**). The proposed project would result in a **potentially significant** impact in 2050 from emissions of GHGs because the State has identified that existing feasible and available reduction measures and technologies would not be adequate to meet the 2050 GHG reduction goal (**Impact-GHG-2**).

2.6.3.4 Issue 2: Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Guidelines for the Determination of Significance Analysis

Impacts related to consistency with an applicable plan, policy, or regulation were determined following the same guidelines for the determination of significance described above in Section 2.6.3.2. Impacts from the proposed project on GHG emissions would be less than significant if the Alpine CPU is found to be consistent with CARB's 2017 Climate Change Scoping Plan and the applicable BMPs.

Impact Analysis

The 2017 Scoping Plan lays out the framework for achieving the 2030 statewide GHG reduction target of 40 percent below 1990 levels and progress toward additional reductions. Appendix B, *Local Action*, of the 2017 Scoping Plan includes detailed GHG reduction measures and local actions that land use development projects can implement to support the statewide goal. For CEQA analyses, the 2017 Scoping Plan states that projects should implement feasible mitigation, preferably measures that can be implemented on-site. While the proposed project would incorporate GHG reduction features, including increased development density in the Village core and improved pedestrian and bicycle networks, not all feasible measures identified in Appendix B of this SEIR would be implemented under the Alpine CPU. This impact would be potentially significant for the 2030 buildout year because the proposed project would not be consistent with the 2017 Scoping Plan. This impact would be potentially significant for the 2050 buildout year because the State has identified that existing feasible and available reduction measures and technologies would not be adequate to meet the 2050 GHG reduction goal.

Federal, State, and Local Regulations and Existing Regulatory Processes

Federal, state, and local regulations and existing regulatory processes discussed under Issue 1 would be applicable to Issue 2. In addition to regulations and processes discussed under Issue 1, another relevant plan for the purposes of reducing emissions of GHG from which plan consistency can be assessed is the RTP/SCS. Projects that would increase regional VMT to a level that was not anticipated in the RTP/SCS or

would result in changes in the regional travel network that were not previously known would be inconsistent with the RTP/SCS. Projects that are determined as inconsistent would be required to implement mitigation measures that would reduce total project VMT. These impacts are analyzed and mitigation measures are disclosed in Section 2.13, *Traffic*.

Summary

Consistency with the 2017 Scoping Plan can be used to determine if the emissions associated with a project would be significant. The Alpine CPU would be compliant with statewide laws and regulations implemented for the purposes of reducing statewide GHGs (e.g., Renewables Portfolio Standard, or Low Carbon Fuel Standard). However, the Alpine CPU does not include project-level policies consistent with the 2017 Scoping Plan. Implementation of the applicable BMPs shown in Table 2.6-4 would be required to demonstrate project-level consistency with the 2017 Scoping Plan; however, the Alpine CPU does not include such policies and would not require the implementation of these project-level BMPs for future development as proposed. These BMPs were not included as policies within the Alpine CPU because they would not have been required for the implementation of projects consistent with or proposing less growth than the General Plan. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. The proposed project would result in a **potentially significant** impact for the 2030 buildout year because it would not be consistent with the 2017 Scoping Plan (**Impact-GHG-3**). This impact would be **potentially significant** for the 2050 buildout year because the State has identified that existing feasible and available reduction measures and technologies would not be adequate to meet the 2050 GHG reduction goal (**Impact-GHG-4**).

2.6.4 Cumulative Impacts Analysis

2.6.4.1 Issue 1: Result in Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment

Global climate change is inherently cumulative; thus, impacts associated with the Alpine CPU discussed above in Section 2.6.3 also serve as the proposed project's cumulative impact (**Impact-C-GHG-1** and **Impact-C-GHG-2**).

2.6.4.2 Issue 2: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Global climate change is inherently cumulative because the GHG emissions of individual projects cannot be shown to have any material effect on global climate. Therefore, impacts associated with the Alpine CPU discussed above in Section 2.6.3 also serve as the proposed project's cumulative impact (**Impact-C-GHG-3** and **Impact-C-GHG4**).

2.6.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potential significant direct and cumulative impacts related to emissions of GHGs and consistency with applicable plans. The following summarizes the potential significant impacts that would result from implementation of the proposed project prior to mitigation.

Impact-GHG-1 and Impact-C-GHG-1: Result in Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment in 2030. The proposed project would result in emissions of GHGs as a result of construction and operation of development in the Alpine CPA. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan to achieve the State's 2030 GHG emissions reduction target. In addition, the proposed project would not achieve VMT reductions consistent with State climate goals. This would be considered a significant impact and would be cumulatively considerable.

Impact-GHG-2 and Impact-C-GHG-2: Result in Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment in 2050. The proposed project would result in emissions of GHGs as a result of construction and operation of development in the Alpine CPA. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan. Further, the 2017 Scoping Plan identifies that existing technologies and feasible measures would not be adequate to achieve the State's 2050 GHG reduction goal. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable.

Impact-GHG-3 and Impact-C-GHG-3: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing Emissions of GHGs by 2030. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan, which identifies measures to achieve the State's 2030 GHG reduction target. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable.

Impact-GHG-4 and Impact-C-GHG-4: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing Emissions of GHGs by 2050. The Alpine CPU does not include policies that would require developments to comply with project-level GHG reduction measures that would be consistent with the 2017 Scoping Plan, which identifies measures to achieve the State's 2030 GHG reduction target. The 2017 Scoping Plan identifies that existing technologies and feasible measures would not be adequate to achieve the State's 2050 GHG reduction goal. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would be considered a significant impact and would be cumulatively considerable.

2.6.6 Mitigation

2.6.6.1 Issue 1: Generate GHG Emissions That May Have a Significant Impact on the Environment

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, discretionary projects would implement the following 2011 General Plan EIR mitigation measures and mitigation measures specific to the Alpine CPU that would reduce the project's direct and cumulative impacts related to GHG emissions. Through implementation of these mitigation measures, the project would demonstrate consistency with the BMPs but would not achieve VMT reductions consistent

with state climate goals (**Impact-GHG-1** and **Impact-C-GHG-1**). While implementation of mitigation measures specific to the Alpine CPU would reduce emissions demonstrating progress toward the State's 2050 GHG reduction goal, there are no existing, feasible mitigation measures that could be applied that would reduce the proposed project's impact to a less than significant level for the 2050 buildout year (**Impact-GHG-2** and **Impact-C-GHG-2**).

2011 General Plan EIR Mitigation Measures

Implementation of the 2011 General Plan EIR mitigation measures (see Appendix B of this SEIR) would reduce the Alpine CPU's impacts related to significant emissions of GHGs. This includes mitigation measures CC-1.1, and CC-1.3 through CC-1.19, which identify County-initiated measures to update ordinances and codes to require more efficient land use development and building efficiencies; and coordination with regional agencies to implement regionwide transportation, water, solid waste, and air quality measures that reduce GHGs; and reduce VMT.

Alpine Community Plan Update Mitigation Measures

MM-GHG-1 Require all development in the Alpine CPA to demonstrate consistency with the 2017 Scoping Plan through the implementation of all applicable BMPs. All development subject to the discretionary review process will identify which BMPs are applicable to the project and provide supporting evidence through CEQA review. This determination shall be provided through a BMP Consistency Review Checklist, developed by the County, to determine whether an individual project would be consistent with required measures.

2.6.6.2 Issue 2: Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, discretionary projects would implement the following 2011 General Plan EIR mitigation measures and mitigation measures specific to the Alpine CPU that would reduce the project's direct and cumulative impacts related to GHG emissions. Implementation of these mitigation measures would demonstrate consistency with the BMPs but would not achieve VMT reductions consistent with State climate goals (**Impact-GHG-3** and **Impact-C-GHG-3**). While implementation of mitigation measures specific to the Alpine CPU would reduce emissions demonstrating progress toward the State's 2050 GHG reduction goal, there are no existing, feasible mitigation measures that could be applied that would reduce the proposed project's impact to a less than significant level for the 2050 buildout year. (**Impact-GHG-4** and **Impact-C-GHG-4**).

Adopted 2011 General Plan EIR Mitigation Measures

Implementation of the 2011 General Plan EIR mitigation measures (see Appendix B of this SEIR) would reduce the Alpine CPU's impacts related to consistency with an applicable plan for the purpose of reducing GHG emissions. This includes mitigation measures CC-1.1, and CC-1.3 through CC-1.19, which identify County-initiated measures to update ordinances and codes to require more efficient land use development and building efficiencies; and coordination with regional agencies to implement regionwide transportation, water, solid waste, and air quality measures that reduce GHGs and reduce VMT.

Alpine Community Plan Update Mitigation Measures

Implementation of **MM-GHG-1** would reduce the Alpine CPU's impacts related to consistency with an applicable plan for the purpose of reducing GHG emissions.

2.6.7 Conclusion

2.6.7.1 Issue 1: Generate GHG Emissions That May Have a Significant Impact on the Environment

Implementation of the Alpine CPU would result in increased emissions of GHGs from construction and operational activities. Currently, there are no thresholds for determining significance of GHG emissions at the local level. In the absence of adequate geographically-specific GHG reduction plans, the CARB 2017 Scoping Plan recommends that projects incorporate design features and GHG reduction measures to the degree feasible, to minimize GHG emissions. The 2017 Scoping Plan includes 43 project-specific example GHG reduction measures in Appendix B, *Local Action*, that could be applied at the project level to determine consistency with the 2017 Scoping Plan. Within this analysis, Scoping Plan measures applicable to the Alpine CPA were refined to develop BMPs that could be implemented locally to demonstrate consistency with the 2017 Scoping Plan. The Alpine CPU does not include any policies that are consistent with the BMPs and would not be consistent with the 2017 Scoping Plan. These BMPs were not included as policies within the Alpine CPU because they would not have been required for the implementation of projects consistent with or proposing less growth than the General Plan.

In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would result in a potentially significant impact regarding the generation of GHG emissions (**Impact-GHG-1** and **Impact-C-GHG-1**). Implementation of the 2011 General Plan EIR mitigation measures and policies, along with Alpine CPU Mitigation Measure **MM-GHG-1** would require future development in the Alpine CPA to be consistent with the 2017 Scoping Plan and reducing GHG emissions from future development to a level that would not have a significant impact on the environment for the 2030 buildout year. However, even with the implementation of this mitigation measure, the proposed project would still not achieve VMT reductions consistent with state climate goals. This impact would not be reduced and would be **significant and unavoidable**. While implementation of mitigation measures specific to the Alpine CPU would reduce emissions demonstrating progress toward the State's 2050 GHG reduction goal, there are no existing, feasible mitigation measures that could be applied that would reduce the proposed project's impact to a less than significant level for the 2050 buildout year (**Impact-GHG-2** and **Impact-C-GHG-2**). Because there are no feasible mitigation measures that could be applied in the Alpine CPU, this impact would be **significant and unavoidable**.

2.6.7.2 Issue 2: Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Implementation of the Alpine CPU would result in development that would not be consistent with the CARB 2017 Scoping Plan. The 2017 Scoping Plan recommends that projects incorporate design features and GHG reduction measures to the degree feasible, to minimize GHG emissions. The 2017 Scoping Plan includes 43 project-specific example GHG reduction measures in Appendix B, *Local Action*, that could be applied at the project-level to determine consistency with the 2017 Scoping Plan. Within this analysis, Scoping Plan measures applicable to the Alpine CPA were refined to develop BMPs that could be

implemented locally to demonstrate consistency with the 2017 Scoping Plan. The Alpine CPU does not include any policies that are consistent with the BMPs and would not be consistent with the 2017 Scoping Plan. These BMPs were not included as policies within the Alpine CPU because they would not have been required for the implementation of projects consistent with or proposing less growth than the General Plan. In addition, the proposed project would not achieve VMT reductions consistent with state climate goals. This would result in a potentially significant impact (**Impact-GHG-3** and **Impact-C-GHG-3**). Implementation of the 2011 General Plan EIR mitigation measures and policies, along with Alpine CPU Mitigation Measure **MM-GHG-1** would require future development in the Alpine CPA to be consistent with the 2017 Scoping Plan. However, even with the implementation of this mitigation measure, the proposed project would still not achieve VMT reductions consistent with state climate goals. This impact would not be reduced and would be **significant and unavoidable**. While implementation of **MM-GHG-1** would reduce emissions demonstrating progress toward the State's 2050 GHG reduction goal, there are no existing, feasible mitigation measures that could be applied that would reduce the proposed project's impact to a less than significant level for the 2050 buildout year (**Impact-GHG-4** and **Impact-C-GHG-4**). Because there are no feasible mitigation measures that could be applied in the Alpine CPU, this impact would be **significant and unavoidable**.

2.7 Wildfire

This section describes the existing wildfire risk in the Alpine Community Plan Area (CPA), the applicable regulations governing wildfire, and the potential for buildout of the Alpine Community Plan Update (CPU) to exacerbate wildfire risk and associated hazards.

This section incorporates information and analysis from the 2011 General Plan as it applies to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both the 2011 General Plan Environmental Impact Report (EIR) and the 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs"). The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. Only the 2011 General Plan EIR will be used for analysis of wildfire due to the outcome of litigation of the FCI GPA.

While wildfire was previously discussed in the 2011 General Plan EIR and FCI EIR, it was not included as a separate section in either EIR. For this Supplemental EIR (SEIR), wildfire is a standalone section that incorporates the new issue questions from the California Environmental Quality Act (CEQA) Appendix G, which were added in December 2018 as a part of a comprehensive update to the CEQA Guidelines. However, goals, policies, and mitigation measures from the 2011 General Plan and General Plan EIR are relevant to this section and will be referenced throughout.

This analysis does not wholly rely on the 2011 General Plan EIR or FCI EIR as a baseline. It should be noted that although the 2011 General Plan is not the baseline for this section, many of the regulations and existing land use designations and mobility elements described in the 2011 General Plan EIR are referenced in this section. The baseline for existing conditions for the issue topics not addressed in the prior EIRs is August 2018 which is when the Notice of Preparation (NOP) for the proposed project was issued. The August 2018 baseline, including relevant changes to the existing conditions analyzed in the 2011 General Plan EIR, is described in detail in Section 2.7.1 below. Table 2.7-1 summarizes the impact conclusions identified in this section.

Comments received in response to the NOP related to wildfire included concerns regarding evacuating people from remote development when wildland fires occur in the Cleveland National Forest (CNF), increased wildfire risk from increased density and number of homes; incorporation of buffers and setbacks between future development and wildfire-prone areas; increased Wildland/Urban Interface area; and secondary effects of wildfires on ecosystems, wildlife, waterways and water quality, air quality, geology and soils, and greenhouse gas emissions. These concerns are addressed and summarized in this section.

Specifically, Sections 2.7.3.1 and 2.7.4.1 address evacuation concerns in the case of wildland fires in the CNF and the entire Alpine CPA. Sections 2.7.3.1, 2.7.3.3, 2.7.4.1, and 2.7.4.3 assess the direct and cumulative impacts to wildfire risk, buffering requirements between future development and wildfire-prone areas, and increased Wildland/Urban Interface areas. Sections 2.7.3.2, 2.7.3.3, 2.7.3.4, 2.7.4.2, 2.7.4.3, and 2.7.4.4 analyze the secondary effects of wildfires on ecosystems, air quality, water quality, and soils, among other environmental resources. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

Table 2.7-1. Wildfire Summary of Impacts

Issue Number	Issue Topic	2011 General Plan EIR Conclusions*	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
WILD-1	Adopted Emergency Response or Emergency Evacuation Plan	Less than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
WILD-2	Expose Receptors to Pollutants from Wildfire	N/A	Potentially Significant	Potentially Significant	Significant and Unavoidable
WILD-3	Exacerbate Wildfire Risk from New Infrastructure	N/A	Potentially Significant	Potentially Significant	Significant and Unavoidable
WILD-4	Expose People or Structures to Significant Risks from Post-Wildfire Hazards	N/A	Potentially Significant	Potentially Significant	Significant and Unavoidable

N/A – not applicable

* Although wildfire hazards were discussed in the prior EIRs, the impact analysis and conclusions do not completely align with the current CEQA Appendix G issue questions.

2.7.1 Existing Conditions

This section discusses the existing wildfire risk of the Alpine CPA. The baseline for existing conditions for this issue area is October 2018, when the NOP for the proposed project was issued.

2.7.1.1 Regional and Local Wildfire Risk

Wildfire, as defined in California Public Resources Code (PRC) Sections 4103 and 4104, is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. In the last two decades, wildfires in California have shown an increase in number of fires ignited, number of acres burned, and number of structures destroyed (CAL FIRE 2018a). Since 2015, the average annual cost of fire suppression in California in areas under state jurisdiction has averaged over $550 million per year (CAL FIRE 2018b), and in 2016 (the most recent year reported) over $4 million of wildfire-related damage occurred in San Diego County alone (CAL FIRE 2016). Of the top 20 largest California wildfires, three have been in San Diego County, including the 2003 Cedar Fire, which burned 273,246 acres, destroyed 2,820 structures, and resulted in the loss of 15 lives (CAL FIRE 2018c). The 2018 West Fire burned approximately 500 acres in the Alpine community, destroying 56 structures. Most recently, the 2020 Valley Fire burned 76,067 acres and damaged or destroyed 75 structures (Cleveland National Forest 2020). The Valley Fire was located outside Alpine and to the southeast.

Several factors, including climate, wind patterns, native vegetation, topography, and development patterns make the unincorporated County susceptible to wildfires. A vast amount of the County's undeveloped lands support natural habitats such as grasslands, sage scrub, chaparral, and some coniferous forest. Extended droughts, characteristic of the region's Mediterranean climate, result in large

areas of dry vegetation that provide fuel for wildland fires. In addition, climate change has also contributed to soil dryness. This dry vegetation is especially vulnerable to wildfire in areas with high winds. Wildfire risk tends to be high in locations where dense vegetation occurs on steep slopes (CAL FIRE 2018d). As a result, high wildfire risk occurs in the hills and mountains of the eastern areas of the County where sparse development intermingles with fire-prone native vegetation. After wildfire burns the vegetation that anchors soil to the hillside, chances increase that a mudflow or landslide could occur in the event of heavy rains (CAL FIRE 2018e).

The Alpine CPA contains many of the characteristics described above, including varying topography, fire-prone vegetation, and predominant weather patterns that increase wildfire risk. Regarding topography, approximately 34,382 acres, or 50 percent, of the Alpine CPA contains areas with slopes greater than 25 percent. In Harbison Canyon, the base of the valley has an elevation of about 1,000 feet. The land then rises to the east reaching an average elevation of 3,000 feet in the Carve Acre neighborhood of Alpine. The highest point, the summit of Viejas Mountain, is over 4,000 feet. This steady rise from west to east is striated by deep canyons such as Harbison Canyon and Peutz Valley. Horsethief Canyon, Sweetwater Valley, and Japatul Valley are also in alignment with both prevailing and Santa Ana wind conditions, creating fire behavior challenges (Greater Alpine Fire Safe Council 2016). In addition, a vast majority of the Alpine community (approximately 78 percent) contains fire-prone vegetation such as chaparral, coastal sage scrub, and grasslands.

While onshore wind patterns prevail under most daytime conditions, Santa Ana winds that can occur between September and March blow from the northeast and reverse the prevailing wind patterns in the valleys. When these winds coincide with the dormant period for chaparral, extreme fire behavior is common. For example, Santa Ana winds rapidly pushed the 2003 Cedar Fire through Peutz Valley, Galloway Valley, Harbison Canyon, and Crest (Greater Alpine Fire Safe Council 2016). These characteristics, combined with the generally rural development pattern of the Alpine CPA, make the community particularly susceptible to wildfire.

Development patterns contribute to wildfire risk in California as well. When communities are in areas that burn frequently, wildfire embers, which can travel for miles, have a negative effect on human health (Black et al. 2017). In addition, more wildfires are started near developed areas and roadways (Syphard et al. 2007), and, as development expands into wildland areas, more wildfires are ignited (Radeloff 2018). An estimated 80 percent of wildfires are ignited by humans (Balch et al. 2017).

2.7.1.2 Wildland Fire History in San Diego County

San Diego County has a long history of wildland fires. As identified in the 2016 annual report produced by the California Department of Forestry and Fire Protection (CAL FIRE—*Wildfire Activity Statistics*) San Diego County is consistently listed among the top five counties in the state for both number of acres burned and dollar value of fire damage. In San Diego County, fire season is typically defined from May through November, depending on variations in weather conditions. However, the threat of a wildland fire is always present and is influenced by weather conditions throughout the year.

The 2007 San Diego County firestorms were the second largest in County history, superseded only by the devastating firestorms of October 2003. The firestorms started on October 21, 2007, near the United States/Mexico international border and burned throughout the County until the last fire was fully contained on November 9, 2007. At the height of the firestorms, there were seven separate fires burning in San Diego County. The fires resulted in seven civilian deaths, 23 civilian injuries, and 89 firefighter injuries. More than 6,200 fire personnel fought to control the wildland fires, but the fires consumed

approximately 369,000 acres, or about 13 percent of the County's total land mass. Additionally, the fires destroyed an estimated 1,600 homes, 800 outbuildings, 253 structures, 239 vehicles, and two commercial properties. The total projected damage costs of the 2007 San Diego County firestorms are estimated to exceed $1.5 billion (EG&G 2007).

The West Fire burned 505 acres and destroyed 49 homes in Alpine in July of 2018. The West Fire ignited on July 6 and was exacerbated by windy conditions, high temperatures, and steep slopes in the region. Two firefighters were injured, and 91 individuals were displaced by the fires. Residents and businesses were without electrical and water service as a result of the fire.

Most recently, the 2020 Valley Fire burned 76,067 acres and damaged or destroyed 75 structures. The Valley Fire was located outside Alpine and to the southeast. It was ignited on September 5, 2020 (Cleveland National Forest 2020). This fire was intensified by dry vegetation, rugged terrain, and high temperatures and winds. Power outages were a result of the fire and three firefighters were injured. Historic fires are shown on Figures 2.7-3a and 2.7-3b.

2.7.1.3 Fire Hazard Designations

CAL FIRE has mapped areas of significant fire hazards in the County through its Fire and Resource Assessment Program. CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas within the state as required by PRC Sections 4201–4205. FHSZs are determined based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZ includes the classifications Very High, High, or Moderate in areas where the state is responsible for fire protection (State Responsibility Areas [SRAs]) (CAL FIRE 2018f). The majority of San Diego County is included in an SRA for fire prevention and suppression. However, some areas such as National Forests are within Federal Responsibility Areas (FRAs), which are under the responsibility of the U.S. Forest Service (USFS) for wildfire protection. FHSZ also includes the classification Very High in areas where local agencies are responsible for fire protection (Local Responsibility Areas [LRAs]) (CBSC 2019). In San Diego County, local fire protection is provided by Fire Protection Districts and County Service Areas (CSAs) in unincorporated areas, and by city fire departments and joint powers agreements within city boundaries. Local fire protection is discussed in more detail in Section 2.11, *Public Services*.

The majority of the County is designated as a Very High and High FHSZ, except for the Desert and eastern Mountain Empire subregions, which are in the Moderate FHSZ. There are also areas of Moderate FHSZ and un-zoned areas in the more densely populated communities around the County. Table 2.7-2 identifies the acres of each FHSZ designation within the Alpine CPA. As shown, almost the entirety of the seven subareas within the Alpine CPA include areas that are designated as a Very High FHSZ. Section 4902.2 of the County Consolidated Fire Code and the respective ordinance state that all SRA lands within Alpine are classified as Very-High FHSZ (See Figures 2.7-1a and 1b).

Additionally, Table 2.7-3 identifies the acres of FHSZ designated areas within each of the seven subareas. As shown, approximately 15,198 acres of the total land within the subareas is designated as a Very High FHSZ.

Table 2.7-2. Wildfire Risk in the Subareas

Fire Hazard Severity Zone	Subarea Acres	Percent of Alpine CPA	Unincorporated Acres	Percentage of Unincorporated County
Very High	15,198	99%	1,452,231	64%
High	12	<1%	369,176	16%
Moderate	0	0%	412,079	18%
Non-Wildland/ Non-Urban	2	0%	16,632	<1%
Urban Unzoned	0	0%	33,403	2%
Total	15,212	100%	2,283,521	100%

Source: CAL FIRE 2017
Table only includes calculations for the seven subareas identified as the proposed project.

Table 2.7-3. Wildfire Risk by Subarea

	Acres			
Subarea	Very High	High	Moderate	No Hazard
1	58	0	0	0
2	143	0	0	0
3	114	0	0	0
4	652	0	0	0
5	2,081	0	0	0
6	105	0	0	0
7	12,045	12	0	2
Total	**15,198**	**12**	**0**	**2**

Source: CAL FIRE 2017

2.7.1.4 Wildland Urban Interface

The wildland urban interface (WUI) is an area where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (USDA and USDOI 2001) and occur in areas designated by CAL FIRE as an FHSZ. A WUI is defined as a buffer around areas of residential density greater than 0.05 dwelling units per acre and is divided into a Defense Zone (the area up to 0.25 mile from the developed area) and a Threat Zone (from 0.25 to 1.5 miles from developed areas) (CAL FIRE 2018g).

The WUI creates an environment in which fire can move readily between structural and vegetation fuels. Once homes are built within (or adjacent to) natural habitat settings, fighting wildland fires becomes more complex because the goal of extinguishing the wildland fire is often superseded by protecting human life and private property.

The WUI is composed of communities that border wildlands or are intermixed with wildlands and where the minimum density exceeds one structure per 40 acres. WUI communities are created when the following conditions occur: (1) structures are built at densities greater than one unit per 40 acres, (2) the

percentage of native vegetation is less than 50 percent, (3) the area is more than 75 percent vegetated, and (4) the area is within 1.5 miles of an area greater than a census block (1,325 acres). The 1.5-mile buffer distance was adopted according to the 2001 California Fire Alliance definition of *vicinity*, which is roughly the distance that pieces of burning wood can be carried from wildland fire to the roof of a structure (University of Wisconsin 2008).

Approximately 60,072 acres of the Alpine CPA are within the WUI, which represents 88 percent of the community. To reduce potential wildfire risk and associated loss of life and property, existing, denser land use designations (e.g., Village Residential) are primarily concentrated in the more urbanized areas of the Alpine CPA, particularly within the Village area.

2.7.2 Regulatory Framework

Wildfire was not analyzed as a separate category in the 2011 General Plan EIR; as such, federal, state, and local regulations that are applicable to wildfire within the Alpine CPA are provided below.

Applicable international regulations include:

2.7.2.1 International Fire Code

The International Fire Code (IFC), created by the International Code Council, is a model document that was adopted and then amended by the California Building Standards Commission (CBSC) and serves as the primary international means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code (IBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is adopted and amended every 3 years.

Applicable state regulations include:

2.7.2.2 California Fire Code

The California Fire Code (CFC) is Chapter 9 of Title 24 of the California Code of Regulations (CCR). It is created by the CBSC and is based on the IFC created by the International Code Council. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is adopted and amended every three years.

The CFC includes requirements for building construction and vegetation management within areas designated as WUIs. In such areas, all new building must comply with the CBC, which defines wildfire protection building construction requirements intended to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a "defensible space" of 100 feet from structures (PRC Section 4291; CCR Title 14 Section 1299.03).

2.7.2.3 State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, and include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

2.7.2.4 California Code of Regulations, Title 14, Division 1.5

CCR Title 14 Division 1.5 establishes the regulations for CAL FIRE and is applicable in all SRAs, which are areas where CAL FIRE is responsible for wildfire protection. Most of the unincorporated County is an SRA, and any development in SRAs must comply with these regulations. Among other things, CCR Title 14 Section 1270, et seq. establishes minimum standards for emergency access, fuel modification, setback to property line, signage, and water supply. San Diego County's most recent adoption of the County Consolidated Fire Code was in 2020 and the code requirements meet or exceed Title 14 Section 1270, et seq. With the recent adoption, the County Consolidated Fire Code supersedes Title 14 Section 1270, et seq., in the unincorporated areas of the County.

Applicable local regulations include:

2.7.2.5 County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses the accumulation of weeds, rubbish, and other materials on a private property found to create a fire hazard and be injurious to the health, safety, and general welfare of the public. The ordinance constitutes the presence of such weeds, rubbish, and other materials as a public nuisance, which must be abated in accordance with the provisions of these sections. This ordinance is enforced in all CSAs and in the unincorporated County outside of a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many fire protection districts have adopted and enforce the County's ordinance. This ordinance was last updated in 2011.

2.7.2.6 County of San Diego Code of Regulatory Ordinances Sections 96.1.004 and 96.1.4907, Removal of Fire Hazards

The San Diego County Fire Authority and Fire Districts, in partnership with CAL FIRE, the Bureau of Land Management, and the USFS, is responsible for the enforcement of defensible space inspections. Inspectors from CAL FIRE are responsible for the inspection of properties to ensure an adequate defensible space has been created around structures. If violations of the program requirements are noted, inspectors provide a list of required corrective measures and provide a reasonable timeframe to complete the task. If the violations still exist upon re-inspection, the local fire inspector will forward a complaint to the County for further enforcement action. This is part of the County Consolidated Fire Code that was last updated in 2020.

2.7.2.7 County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001. The Consolidated Fire Code contains the County and fire protection districts amendments to the CFC. The purpose of consolidation of the County and local fire districts adoptive ordinances is to promote consistency in the interpretation and enforcement of the Consolidated Fire Code for the protection of the public health and safety, which includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the Consolidated Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases. The Consolidated Fire Code is amended and adopted every 3 years, with the most recent version approved by the Board of Supervisors on February 25, 2020.

2.7.2.8 County of San Diego Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County's Department of Planning and Land Use (now Planning & Development Services) incorporated a number of fire prevention strategies into the discretionary project review process for CEQA projects. One of the more significant changes is the requirement that the majority of discretionary permits (e.g., subdivision and use permits) in WUI areas prepare a Fire Protection Plan for review and approval. A Fire Protection Plan is a technical report that considers the topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history of the proposed project location. The plan addresses the following (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access for emergency services and evacuation of residents, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features (e.g., ember vents), fire protection systems and equipment (e.g., sprinklers), impacts on existing emergency services, defensible space, and vegetation (fuel) management. The County's Guidelines for Determining Significance – Wildland Fire and Fire Protection was last updated in 2010.

2.7.2.9 County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The Federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan in order to qualify for hazard mitigation funding. The Multi-Jurisdictional Hazard Mitigation Plan is a countywide plan that identifies risks and ways to minimize damage by natural and human-made disasters. The plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination.

Each of the 18 cities in the County participated in the planning process, as well as the Alpine Fire Protection District, Rancho Santa Fe Fire Protection District, and Padre Dam Municipal Water District. Based on its review of jurisdictional-level hazard maps, Alpine Fire Protection District identified

approximately 12,885 people, 4,814 residential structures, 1,355 commercial structures, and 142 critical facilities that are exposed to wildfire/structure fire hazards (Fire Regime classes II and IV).[1]

The Multi-Jurisdictional Hazard Mitigation Plan addresses wildfire risk within the San Diego region by assessing the exposure to wildfire hazard of populations in the different jurisdictions within the region. The assessment includes exposure of population, residential buildings, and commercial buildings, as well as exposure of critical facilities and infrastructure such as airports, bridges, and electric power facilities. The plan then outlines goals, objectives, and actions for each jurisdiction within the San Diego region. Goals related to wildfire typically include reducing the possibility of damage and loss due to structural/wildfire. Objectives and actions related to wildfire typically include measures such as updating fire and evacuation plans, maintaining vegetation management policies, and maintaining adequate emergency response capability. This plan was last updated in 2018.

2.7.2.10 County of San Diego Operational Area Emergency Operations Plan

The Operational Area Emergency Operations Plan (Emergency Plan) (Unified San Diego County Emergency Services Organization and County of San Diego 2018) is an emergency management system for San Diego County and the incorporated cities in the San Diego region that provides for a planned response to emergencies associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The plan was developed by the Unified Disaster Council, a governing body that includes representatives from the County of San Diego and each of the incorporated cities in the San Diego region. The previous version, published in 2014, was revised in 2017 and published in 2018.

The purpose of the Emergency Plan is to outline strategies, procedures, recommendations, and organizational structures that can be used to implement a coordinated evacuation effort in the San Diego Operational Area. Annex B of the Emergency Plan, *Fire Rescue and Mutual Operations*, includes information about shared firefighting resources that can respond to wildfires such as helicopters provided by the San Diego Sheriff's Department/CAL FIRE Program, San Diego City Fire-Rescue Department Air Operations Section, and the USFS.

Annex Q of the Emergency Plan, *Evacuation*, identifies wildfires as the most likely of six hazards that could affect the San Diego operational area and require evacuation of several communities (the other five are dam failure, earthquake, flooding, tsunami, and terrorism). This part of the Emergency Plan identifies agencies or organizations that are typically responsible for an evacuation effort and how regional resources will be requested and coordinated. Attachment 2 of the Evacuation Annex, *Evacuation Routes*, identifies primary evacuation routes in the San Diego region, which consist of the major interstates, highways, and prime arterials within the County. Annex Q identifies modes of transportation, transportation collection points, and elements of transportation coordination that would be required in the case of an evacuation. Specific locations would be designated by local law enforcement personnel.

2.7.2.11 Fire Safe Council of San Diego County

The Fire Safe Council (FSC) of San Diego County was formed in 1997 as a nonprofit corporation through a collaboration between the Resource Conservation District of Greater San Diego County and federal,

[1] The U.S. Geological Survey LANDFIRE model provides five different Fire Regime classes for purposes of determining wildfire risk. Fire Regime II is defined as 0- to 35-year frequency and high severity, and Fire Regime IV is defined as 35- to 100+-year frequency and high severity.

state, local, and tribal fire agency partners. The FSC acts as an umbrella organization for the 38 locally formed community fire safe councils within the County. These local councils are typically formed by citizens through the greater FSC of San Diego County and are considered part of the state-wide network of fire safe councils.

Approximately 150 communities throughout the state have created fire safe councils, 35 of which are within San Diego County. The Alpine community is home to two councils: The Greater Alpine Fire Safe Council and the Viejas Fire Safe Council. In 2004, a Public Safety Committee consisting of concerned citizens and first responders was formed and began to meet with representatives from the USFS, CAL FIRE, Alpine Fire Protection District, Viejas Fire Department, San Diego County Sheriff, and the Alpine Community Planning Group to develop a plan to reduce wildfire risk in Alpine. Following years of meetings, the Greater Alpine Fire Safe Council was formed in 2006 to carry out the objectives of the Alpine Public Safety Committee and consists of volunteers from the community.

2.7.2.12 Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee with guidance and support from the USFS, CAL FIRE, California Department of Transportation, County Office of Emergency Services, County Department of Planning and Land Use (now Planning & Development Services), County Sheriff's Department, Alpine Fire Protection District, Viejas Fire Department, and Greater Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (money, people, and equipment) to achieve the greatest overall benefit to the community. The primary goal is to prioritize projects as follows:

- Defensible Space around Structures
- Defensible Space along Evacuation Routes
- Hazardous Fuels Reduction

A key element of the planning strategy is to link together existing and future fuels reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together include defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

2.7.2.13 County of San Diego General Plan Policies

The General Plan includes goals and policies in the Land Use Element, Mobility Element, Conservation and Open Space Element, Housing Element, and Safety Element, which are applicable to wildfire within the Alpine CPA.

Land Use Element

Goal LU-6 advocates for a built environment in balance with the natural environment, scarce resources, natural hazards, and the unique character of individual communities. Policy LU-6.10 supports this by promoting that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy LU-6.11 supports this by assigning land uses and densities in a manner that minimizes development in extreme, very high, and high fire threat areas or other unmitigable hazardous areas.

Goal LU-10 advocates for designating semi-rural and rural lands that buffer communities, protect natural resources, foster agriculture , and accommodate unique rural communities. This is supported by Policy LU-10.2, which promotes that development in semi-rural and rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

Goal LU-12 advocates adequate and sustainable infrastructure, public facilities, and essential facilities that meet community needs and are provided concurrent with growth and development. Policy LU-12.3 supports this by providing public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. In addition, it encourages the colocation of infrastructure facilities, where appropriate. Policy LU-12.4 supports this goal by planning site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and wherever feasible, locate any facilities and supporting infrastructure outside preserve areas. This policy promotes sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Roads identified in table M-4 (of the General Plan) an LOS D or better may not be achieved.

Mobility Element

Goals M-1 advocates a safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities. Goal M-2 promotes a road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character. These goals are supported by Policies M-1.2, M-2.3, and M-2.5. Policy M-1.2 promotes the provision of an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-2.3 promotes the location and design of public and private roads to minimize impacts to significant biological and other environmental and visual resources. In addition, this policy promotes the avoidance of road alignments through flood plains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Further, this policy supports designing new roads to maintain wildlife movement and retrofit existing roads for that purpose. Finally, this policy promotes the utilization of fencing to reduce roadkill and to direct animals to under crossings. Policy M-2.5 requires that road improvements be designed to accommodate stormwater in a manner that minimizes demands upon engineered stormwater systems and to maximize the use of natural detention and infiltration techniques to mitigate environmental impacts.

Goal M-3 advocates new or expanded transportation facilities that are phased with and equitably funded by development that necessitates their construction. This goal is supported by Policy M-3.3 that requires development to provide multiple ingress/egress routes in conformance with State law and local regulations.

Finally, Goal M-4 promotes that roads be designed to be safe for all users and compatible with their context. This goal is supported by Policy M-4.4 that promotes that public and private roads be designed to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

Conservation and Open Space Element

Goal COS-5 advocates the protection and maintenance of local reservoirs, watersheds, aquifer-recharge areas, and natural drainage systems to maintain high-quality water resources. This goal is supported by Policy COS-5.3 that requires development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources which reduces the risk of flooding or landslides following wildfires.

Goal COS-12 advocates for the preservation of ridgelines and steep hillsides for their character and scenic value. Policy COS-12.1 promotes the protection of undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designation on these areas which serves a secondary purpose of minimizing development in steep environments that are more vulnerable to wildfire.

Housing Element

Goal H-5 of the Housing Element promotes governmental policies or regulations that do not unnecessarily constrain the development, improvement, or conservation of market rate or affordable housing. This goal is supported by Policy H-5.3 that promotes working with local fire agencies (see Figures 2.7-2a and 2.7-2b) to improve fire protection for multi-story construction.

Safety Element

Goal S-1 promotes enhanced public safety and the protection of public and private property. This goal is supported by policies S-1.3, S-1.4, and S-1.5. Policy S-1.3 advocates for support efforts and programs that reduce both the risk of natural and manmade hazards and that reduce the time for responding to these hazards. Policy S-1.4 promotes the review and update of the County's Multi-Jurisdictional Hazard Mitigation Plan be updated every five years. Policy S-1.5 promotes the participation in programs and procedures that emphasize coordination between appropriate public agencies and private entities to remove debris and promote the rapid reconstruction of the County following a disaster event and facilitate the upgrading of the built environment as expeditiously as possible.

Goal S-3 and Policies S-3.1 through S-3.6 require that fire hazards be minimized through responsible development, vegetation management, and maintenance of accessible road networks for emergency services.

Goals S-4, S-5, and S-6 relate to interagency and interjurisdictional coordination of fire prevention. Policy S-4.1 also recommends that the County develop fuel management programs based on comments from neighboring fire management jurisdictions. Policies S-5.1 and S-5.2 require regional coordination and agreements between fire protection services to maximize service levels. Policies S-6.4 and S-6.5 require that new development conform to travel time standards and that appropriate fire protection services be established before or concurrent to development.

Goal S-8 relates to the reduction of landslide and mudslide hazards, which may be more likely following wildfire events. Policy S-8.1 directs development away from areas with high landslide or mudslide potential, and S-8.2 prohibits development from causing or contributing to slope instability.

2.7.2.14 Alpine CPU Policies

The proposed project also includes goals and policies within the Safety Element that are applicable to wildfire within the Alpine CPA.

Safety Element

Goal S-1 promotes the establishment of emergency procedures and preventative measures to minimize damage from fire, geologic hazards, crime occurrence, and hazardous substances. This goal is supported by Policies S-1.1, S-1.2, S-1.3, S-1.4, and S-1.5. Policy S-1.1 promotes maintaining continued support of the Community Wildfire Protection Plan (CWPP) and the Greater Alpine Fire Safe Council. Policy S-1.2 encourages development with fire preventive development practices and fire-resistant plant types. Policy S-1.3 promotes the expansion of fire, police, and emergency health or other services, as needed. Policy S-1.4 supports the establishment of alternative means of ingress/egress to/from Palo Verde Ranch and other existing neighborhoods. Policy S-1.5 encourages the application of the Conservation Subdivision Program to new residential subdivisions for the improvement of fire protection in addition to preserving sensitive environmental resources.

2.7.3 Analysis of Project Effects and Determination as to Significance

The County of San Diego Guidelines for Determining Significance – Wildland Fire and Fire Protection (2010) provides guidance for evaluating adverse environmental effects associated with wildland fire. However, these guidelines have not been updated to reflect the current CEQA Appendix G questions related to wildfire. Therefore, the impact analysis that follows relies on Appendix G of the State CEQA Guidelines. Based on guidance provided in Appendix G of the State CEQA Guidelines, the Alpine CPU would result in a significant impact if it would lead to any of the following.

1. Be located in or near state responsibility areas or lands classified as Very High FHSZ and would substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Be located in or near state responsibility areas or lands classified as Very High FHSZ and would exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.
3. Be located in or near state responsibility areas or lands classified as Very High FHSZ and would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts to the environment.
4. Be located in or near state responsibility areas or lands classified as Very High FHSZ and would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes.

2.7.3.1 Issue 1: Adopted Emergency Response Plan or Emergency Evacuation Plan

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on the environment if it would be located in or near SRAs or lands classified as Very High FHSZ and would substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

The 2011 General Plan EIR determined that the 2011 General Plan would result in future development in areas that may not have been accounted for in existing emergency response and evacuation plans, and therefore would have the potential to impair these plans, resulting in a significant impact. However, it was determined that the 2011 General Plan would not result in a cumulatively considerable impact on emergency response and evacuation plans. The discussion of impacts related to emergency response and evacuation plans from implementation of the 2011 General Plan can be found in Section 2.7, *Hazards and Hazardous Materials* and 2.15, *Transportation and Traffic* of the 2011 General Plan EIR, and is hereby incorporated by reference.

The 2011 General Plan EIR concluded that the implementation of the 2011 General Plan would have the potential to substantially impair an adopted emergency response plan or emergency evacuation plan or result in inadequate emergency access. In addition, implementation of the 2011 General Plan would have the potential to contribute to potentially significant cumulative impacts associated with emergency response or emergency evacuation plans. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies. Specifically, General Plan policies M-1.2, M-3.3, M-4.4, H-5.3, S-1.3, S-1.5, S-3.1 through S-3.6, S-5.1, S-5.2, S-6.4, and S-6.5 reduce these potential impacts by supporting coordinated and responsible fire hazard and general hazard planning (see Appendix __. Furthermore, emergency response and evacuation plans are bolstered by the County Consolidated Fire Code, CCR Title 14 Division 1.5, and State Fire Regulations.

The proposed project would allow for increased dwelling units in Subareas 2, 4, and 6, amounting to a potential increase of 2,013 dwelling units. Additionally, proposed mobility network changes associated with the proposed project would allow roadway re-classifications and re-configurations within the seven subareas and a new roadway in Subarea 5. Both the increase in dwelling units and mobility network changes would have the potential to adversely impact adopted emergency response or emergency evacuation plans. The General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 4,065 dwelling units currently allowed by the General Plan in the seven subareas to the 6,078 units proposed in the Alpine CPU.

Approximately 60,072 acres of the Alpine CPA are within the WUI, which represents 88 percent of the community, and all seven subareas are entirely within the WUI. In addition, all seven subareas are within a Very High FHSZ, while Subarea 6 also contains areas designated as a High FHSZ (approximately 41 percent of the subarea). Compared to the 2011 General Plan, 2,013 additional housing units could be developed at buildout throughout the seven subareas under the proposed project.

According to the pamphlet entitled “Alpine Emergency Evacuation Routes” distributed by the Alpine Fire Safe Council, Subareas 1, 4, and 5 are not directly connected to main evacuation roads (Alpine Fire Safe Council n.d.). Subarea 4 would have additional dwelling units under the Alpine CPU, and with the increase

in population density, emergency response times or access could be limited, which could substantially impact an emergency response or evacuation plan. Because Subarea 5 is impacted by the proposed changes to the mobility network, it is possible that the adopted evacuation and emergency response plans could be substantially impaired by roadway expansions or construction. However, the proposed mobility network expansion within Subarea 5 has been designed to connect to the main evacuation road. Once constructed, it would provide better access to evacuation routes and will align with existing evacuation and emergency response plans. Additionally, the mobility element would re-align a roadway in Subarea 1 to provide better fire access. Construction activities associated with future development implemented under the Alpine CPU would have the potential to interfere with emergency response plans and procedures for general natural disasters if authorities are not properly notified, or if multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. Both the mobility network changes and population density and land use intensity changes could impact the entire CPA, even though the proposed project only changes land use designations and mobility in certain subareas. However, the mobility element changes will also provide better emergency response and evacuation access once constructed.

Future development projects within the Alpine CPA implemented under the proposed project could adversely impact emergency response and evacuation plans if the level of emergency service is not adequate enough to support the increased population or if changes to the mobility network impact the emergency response or evacuation plans. Future discretionary projects would be subject to an environmental review process and federal, state, and local regulations that support emergency response and evacuation plans and would be required to mitigate for fire-related impacts. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development and changes to the mobility network could still adversely impact emergency response and evacuation plans to a degree greater than can be reasonably expected under the existing conditions and beyond that analyzed by the 2011 General Plan EIR. As such, this impact is **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.7.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to support emergency response and evacuation plans in the County that are also applicable to the proposed project. Subsequent projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to wildfire, emergency response plans, and emergency evacuation plans.

CCR Title 14 Division 1.5 provides minimum standards for emergency access. Future projects implemented under the Alpine CPU will be required to comply with these regulations, which will ensure that no adopted emergency access or evacuation plan is substantially impaired as a result of the proposed project. The County Consolidated Fire Code includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management, and also helps prevent the release of hazardous substances during and following fire hazards.

The Multi-Jurisdictional Hazard Mitigation Plan requires that fire evacuation plans be updated regularly to reflect current wildfire risk and available emergency services, and also that jurisdictions maintain emergency response capabilities over time. The County of San Diego Operational Area Emergency Operations Plan, which establishes protocols for emergency response to multiple hazards including wildfire, also supports existing emergency response and evacuation plans. Similarly, the Alpine

Community Wildfire Protection Plan is designed to support emergency response and evacuation plans by reducing hazardous fuel storage and requiring defensible space along evacuation routes.

Furthermore, the County of San Diego Guidelines for Determining Significance – Wildland Fire and Fire Protection (2010) requires a comprehensive analysis of wildfire risk for discretionary projects and may require a technical report that analyzes emergency response time, emergency services availability, and other factors to ensure that discretionary projects do not substantially impact emergency response and evacuation plans.

General Plan Policies M-1.2, M-3.3, M-4.4, H-5.3, S-1.3, S-1.5, S-3.1 through S-3.6, S-5.1, S-5.2, S-6.4, and S-6.5 prevent projects from impairing adopted emergency response and evacuation plans. The 2011 General Plan EIR also identified several mitigation measures addressing impacts related to emergency response and evacuation plans that would be applicable to the proposed project, including MM-Haz-3.1 through MM-Haz-3.3, MM-Haz-4.4, MM-Pub-1.5, and MM-Tra-4.1 through MM-Tra-4.3, which are provided in Section 2.7.6, below. Project-specific mitigation measure MM-WILD-1 would reduce the proposed project's impacts on emergency response and evacuation plans related to wildfire.

Summary

The proposed project increases the permitted densities within the CPA and proposes changes to mobility networks that may impact adopted emergency response and evacuation plans, particularly in subareas not directly connected to major evacuation routes. For the Alpine CPA, the Alpine Area Evacuation Map identifies main evacuation routes for Alpine (see Figure 2.7-4). Future development projects implemented under the proposed project may also impact emergency response and evacuation plans within the Alpine CPA. Future projects would be required to comply with the numerous regulations related to emergency response and evacuation plans, and discretionary permits would be evaluated according to the County's Guidelines for Determining Significance – Wildland Fire and Fire Protection. Despite these regulations and policies, impacts to emergency response and evacuation plans would be **potentially significant,** and mitigation would be required **(Impact WILD-1).**

2.7.3.2 Issue 2: Expose Receptors to Pollutants from Wildfire

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would be located in or near SRAs or lands classified as Very High FHSZ and would exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.

Impact Analysis

The 2011 General Plan EIR determined that the 2011 General Plan would result in future development in areas that could exacerbate wildfire risk and expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire, resulting in a significant impact. Impacts related to wildfire risk and pollutant exposure from implementation of the 2011 General Plan were not addressed explicitly in the 2011 General Plan EIR because Wildfire was not analyzed as a separate section at the time it was adopted. However, Sections 2.7, *Hazards and Hazardous Materials*; 2.8, *Hydrology and Water Quality*; 2.13, *Public Services*; 2.15, *Transportation and Traffic*; and 2.17, *Global Climate Change* of the 2011 General Plan EIR address wildfire risk and exposure to pollutants and are hereby incorporated by reference.

Implementation of the 2011 General Plan would have the potential to contribute to potentially significant direct and cumulative impacts associated with exacerbated wildfire risk and exposure to pollutants. However, 2011 General Plan policies LU-6.10, LU-6.11, COS-5.3, COS-12.1, H-5.3, S-1.3, S-3.1, and S-3.6 reduce these potential impacts by limiting development in high fire hazard areas and minimizing exposure to pollutants as a result of wildfire. Furthermore, wildfire risk and risk of pollutant exposure are minimized by adherence to the IFC and CFC, CCR Title 14 Division 1.5, the County Consolidated Fire Code, and other regulations.

Development within or adjacent to areas designated as Very High FHSZ and/or WUI areas has the potential to exacerbate wildfire risk, particularly if it occurs in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. As shown in Figures 2.7-1a and 2.7-1b, a majority of the Alpine CPA is within a WUI area and Very High FHSZ under either state or federal responsibility. Within the Alpine CPA, all seven subareas are within a Very High FHSZ, while Subarea 6 also contains areas designated as a High FHSZ (approximately 41 percent of the subarea). All seven subareas are entirely within the WUI. One of the primary threats to human health associated with wildfire smoke is from airborne particulate matter ($PM_{2.5}$ and PM_{10}). Because of its small size, particulate matter can enter a person's eyes and respiratory system, which could cause short-term health effects such as burning eyes, sinus issues, and bronchitis. In addition, fine particulates can also exacerbate existing health conditions such as chronic heart and lung diseases (EPA 2018a). Other receptors particularly susceptible to airborne particulate matter from wildfires include people with asthma, older adults, children, and pregnant women (EPA 2018b). Development in fire hazardous areas could result in increased pollutant exposure.

The proposed project would increase density by 2,013 dwelling units within three of the subareas, including in areas designated as a Very High FHSZ and/or WUI. Approximately 50 percent of the Alpine CPA contains areas with slopes greater than 25 percent, as shown in Figures 2.7-5a and 2.7-5b, which are more susceptible to wildfire spreading. Subareas 4 and 5 in particular are situated in areas with substantial topographical changes, with the Sweetwater River valley bordering Subarea 5 to the south, and contain large swaths of fire-prone vegetation such as chaparral and coastal sage scrub. Most wildfires are started near developed areas and roadways (Syphard et al. 2007), and as development expands into wildland areas, more wildfires are ignited (Radeloff 2018). An estimated 80 percent of wildfires are ignited by humans (Balch et al. 2017). At buildout, the proposed project would introduce approximately 2,013 potential new housing units to Subareas 2, 4, and 6. As such, future development within these subareas would have the potential to exacerbate wildfire risk by introducing a substantial number of new residents, who in turn could be exposed to pollutant concentrations such as particulate matter in the event of a wildfire.

Future development projects within the Alpine CPA implemented under the proposed project could adversely impact wildfire risk and pollutant exposure. Any future development would be subject to an environmental review process and federal, state, and local regulations that minimize wildfire risk and pollutant exposure. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development could still adversely impact wildfire risk and pollutant exposure. As such, this impact is **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.7.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to minimize wildfire risk and pollutant exposure in the County that are also applicable

to the proposed project. All projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to wildfire.

The IFC, CFC, and County Consolidated Fire Code regulate the handling and storage of hazards that may be flammable or result in exposure to pollutants and designate protective measures to prevent the ignition or release of such materials. CCR Title 14 Division 1.5, in conjunction with the Defensible Space Fire Protection Ordinance and the Removal of Fire Hazards Ordinance, mandates the maintenance of adequate defensible space around buildings, roads, and emergency access networks. Similarly, the Alpine Community Wildfire Protection Plan is designed to support emergency response and evacuation plans by reducing hazardous fuel storage and requiring defensible space along evacuation routes.

The County Consolidated Fire Code includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management, and also helps prevent the release of hazardous substances during and following fire hazards.

Furthermore, the County of San Diego Guidelines for Determining Significance – Wildland Fire and Fire Protection (2010) requires a comprehensive analysis of wildfire risk for discretionary projects and may require the preparation of a technical report that analyzes factors such as topography, geology, combustible vegetation (fuel types), and climatic conditions and determines the appropriate fire protection measures, including building design features, defensible space, and vegetation management.

General Plan Policies LU-6.10, LU-6.11, LU-10.2, COS-5.3, COS-12.1, H-5.3, S-1.3, and S-3.1 through S-3.6 reduce the risk of wildfire spreading and pollutant exposure, and 2011 General Plan EIR mitigation measures MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Hyd-3.2, MM-Pub-1.4, MM-Pub-1.7, MM-Tra-4.3, and MM-CC-1.12 would also be applicable to wildfire risk and pollutant exposure.

Summary

The proposed project would increase the permitted densities within three subareas, which may exacerbate wildfire risk and exposure to pollutants, particularly in subareas where land use designation changes allow a higher density of dwelling units. However, fire risks are reduced in the village center of Alpine compared to the residences located within the more rural WUI for numerous reasons, including shorter emergency response and travel times, better road access and water availability, and fewer unmaintained private yards, which could contain dry brush and other flammable materials. Increased density is proposed within the village boundary (Subareas 2 and 6), which is located away from areas with elevated risk for fire outbreak and spread such as steep canyons. In addition, increased density is also proposed in an area adjacent to the freeway that serves as an evacuation route for the Alpine CPA (Subarea 4). Future development projects would reduce fuel load and provide better access; however, subsequent projects implemented under the proposed project may also impact wildfire risk and pollutant exposure within the Alpine CPA. Future projects would be required to comply with the numerous regulations related to wildfire risk and pollutant exposure, and discretionary permits would be evaluated according to the County's Guidelines for Determining Significance – Wildland Fire and Fire Protection. Despite these regulations and policies, impacts to wildfire risk and pollutant exposure would be **potentially significant,** and mitigation would be required **(Impact WILD-2).**

2.7.3.3 Issue 3: Exacerbate Wildfire Risk from New Infrastructure

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would be located in or near SRAs or lands classified as Very High FHSZ and would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts on the environment.

Impact Analysis

The 2011 General Plan EIR determined that the 2011 General Plan would result in future development in areas that could require the installation or maintenance of infrastructure that may exacerbate fire risk or impact the environment, resulting in a significant impact. Impacts related to wildfire risk and pollutant exposure from implementation of the General Plan were not addressed explicitly in the 2011 General Plan EIR because wildfire was not analyzed as a separate section at the time it was adopted. However, Sections 2.7, *Hazards and Hazardous Materials*; 2.9, *Land Use*; 2.13, *Public Services*; and 2.15, *Transportation and Traffic* of the 2011 General Plan EIR address wildfire risk and exposure to pollutants and are hereby incorporated by reference.

Implementation of the 2011 General Plan would have the potential to contribute to potentially significant direct and cumulative impacts associated with expanded or altered emergency services infrastructure. However, several General Plan policies, including LU-6..10, LU-6.11, LU-10.2, LU-12.3, LU-12.4, M-2.3, M-2.5, S-1.3, S-6.4, and S-6.5, reduce the potential impacts by ensuring that adequate emergency infrastructure is implemented in tandem with development and protecting environmental resources from the impacts of this development. Furthermore, emergency infrastructure maintenance and its potential environmental impacts are minimized by adherence to State Fire Regulations, the County Fire Code, and other regulations.

The proposed project would allow for increased population density and land use intensity (commercial development) in Subareas 2, 4, and 6, amounting to a potential increase of 2,013 dwelling units in the Alpine CPA. Additionally, proposed mobility network changes associated with the proposed project would allow roadway re-classifications and re-configurations within the seven subareas and a new roadway in Subarea 5. Both the increase in dwelling units and mobility network changes could require the maintenance or expansion of emergency services infrastructure within the Alpine CPA because of the population increase and mobility changes, and this could result in a negative effect on the environment. The General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 4,065 dwelling units currently allowed in the seven subareas by the General Plan to the 6,078 units proposed in the Alpine CPU.

As discussed under Issue 2, a majority of the Alpine CPA is within a WUI area and Very High FHSZ under either state or federal responsibility. Within the Alpine CPU area, all seven subareas are within a Very High FHSZ, while Subarea 6 also contains areas designated as a High FHSZ (approximately 41 percent of the subarea). All seven subareas are entirely within the WUI. To accommodate the growth associated with buildout of the Alpine CPU, it is anticipated that new or expanded infrastructure would be required, such as the extension of roads and utility services.

While most of the subareas are within parts of the Alpine CPA that are currently served by existing infrastructure, Subareas 4 and 5 contain numerous dirt roads and large areas of undeveloped land. Future

development within these subareas would likely require paving of new roads or paving over existing dirt roads and the extension of utilities such as electrical power lines. The construction of new roads and extension of utilities into previously undeveloped areas of the Alpine CPA would increase wildfire risk because most wildfires are started near developed areas and roadways. Clustered development, adoption of Firewise Adapted Community strategies, appropriate project siting, and implementation of CBC 7a building construction techniques would reduce fire risk associated with new development. Additionally, extended road networks would provide better access for emergency services and better connection to evacuation routes. However, future development and associated emergency services infrastructure within these subareas would have the potential to adversely impact the environment.

Future development projects within the Alpine CPA implemented under the proposed project could result in the construction or maintenance of existing emergency services infrastructure. Future discretionary projects would be subject to an environmental review process and federal, state, and local regulations, as applicable, which would minimize adverse environmental impacts such as those that could occur during the expansion of emergency services infrastructure. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development and associated infrastructure changes could still adversely impact the environment. As such, this impact is **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.7.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to minimize wildfire risk and pollutant exposure in the County that are also applicable to the proposed project. All projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to wildfire.

State Fire Regulations regulate building standards (as also set forth in the CBC), fire protection, and notification systems. Additionally, the County Consolidated Fire Code includes permit requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the code. The Consolidated Fire Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management, and also helps prevent the release of hazardous substances during and following fire hazards.

General Plan Policies LU-6.10, LU-6.11, LU-10.2, LU-12.3, LU-12.4, M-2.3, M-2.5, S-1.3, S-6.4, and S-6.5 ensure adequate emergency service levels and minimize adverse impacts to the environment that may occur as a result of the expansion of these services. The 2011 General Plan EIR mitigation measures MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Lan-1.2, MM-Pub-1.3 through MM-Pub-1.6, MM-Pub-1.8, MM-Tra-1.4, and MM-Tra-4.3 would also be applicable to emergency services infrastructure expansion and its potential environmental impacts.

Summary

The proposed project increases the permitted densities and land use intensities in addition to expanding and refining the mobility network within the CPA, which may result in the expansion of emergency services infrastructure. Future development projects implemented under the proposed project may also require expanded emergency services infrastructure, which could adversely affect the environment within the Alpine CPA. Future projects would be required to comply with the numerous regulations related to emergency services expansion and the environmental impacts associated with such development, and discretionary permits would be evaluated according to the County's Guidelines for

Determining Significance – Wildland Fire and Fire Protection. Despite these regulations and policies, impacts would be **potentially significant,** and mitigation would be required **(Impact WILD-3).**

2.7.3.4 Issue 4: Expose People or Structures to Significant Risks from Post-Wildfire Hazards

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would be located in or near SRAs or lands classified as Very High FHSZ and would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis

The 2011 General Plan EIR determined that the 2011 General Plan would result in future development in areas that could expose people or structures to significant risks from post-wildfire hazards, resulting in a significant impact. Impacts related to post-wildfire risks from implementation of the General Plan were not addressed explicitly in the 2011 General Plan because wildfire was not analyzed as a separate section at the time it was adopted. However, Sections 2.7, *Hazards and Hazardous Materials*; 2.8, *Hydrology and Water Quality*; 2.15, *Transportation and Traffic;* and 2.17*, Global Climate Change* of the 2011 General Plan EIR address post-wildfire hazard risk and are hereby incorporated by reference.

Implementation of the 2011 General Plan would have the potential to contribute to potentially significant direct and cumulative impacts associated with expanded or altered emergency services infrastructure. However, several General Plan policies, including LU-6.10, LU-6.11, LU-10.2, M-2.5, COS-5.3, COS-12.1, S-1.3, S-1.4, S-1.5, S-8.1, and S-8.2 reduce the potential impacts by limiting development in areas with steep slopes and limiting development that might result in unstable slopes, landslides, or mudslides. Furthermore, post-wildfire hazard risk is also mitigated by adherence to the County of San Diego Operational Area Emergency Operation Plan, the County Consolidated Fire Code, and other regulations.

According to the U.S. Geological Survey (USGS), fast-moving and highly destructive debris flows triggered by intense rainfall are considered one of the most dangerous post-wildfire hazards. The risk of flooding and debris flows increases substantially after a wildfire due to the loss of vegetation, which leaves previously covered soil exposed during a rainstorm. While several factors contribute to post-fire debris flow, it is generally triggered by one of the following two processes: surface erosion caused by rainfall runoff and landslides caused by rainfall seeping into the ground. These hazards pose a risk to life and property due to their sudden occurrence; extreme force; and ability to strip vegetation, block drainages, and damage infrastructure. The USGS further notes that post-wildfire flooding and runoff may continue for several years in burn areas; however, the greatest risk of debris flow happens during the first post-fire storm season (USGS 2019).

As discussed under Issue 2, approximately 50 percent of the Alpine CPA contains areas with slopes greater than 25 percent. Subareas 4 and 5 are situated in areas with substantial topographical changes, with the Sweetwater River valley bordering Subarea 5 to the south, and contain large swaths of fire-prone vegetation such as chaparral and coastal sage scrub, making them particularly susceptible to post-wildfire hazards such as debris flows, landslides, and slope instability. Additionally, the western portion of Subarea 5 is within the burn area of the West Fire, which burned approximately 505 acres and destroyed 56 structures in 2018. By increasing density in these subareas, the proposed project would both potentially

exacerbate wildfire risk and increase risks to life and property by allowing for new housing units and residents in an area prone to wildfire and susceptible to the aforementioned post-wildfire hazards. Consequently, the proposed project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-wildfire slope instability, or drainage changes. It is important to note that, although Subarea 5 increases density within a portion of the subarea, overall density would be decreased.

The proposed project would allow for increased dwelling units in Subareas 2, 4, and 6, amounting to a potential increase of 2,013 dwelling units in the Alpine CPA. Additionally, proposed mobility network changes associated with the proposed project would allow roadway re-classifications and re-configurations within the seven subareas and a new roadway in Subarea 5. Both the increase in dwelling units and mobility network changes could change drainage regimes or contribute to slope instability, inadvertently altering post-wildfire hazard risk within the Alpine CPA, which would be considered a significant impact.

Future development projects within the Alpine CPA implemented under the proposed project could increase post-wildfire hazard risk. Any future development would be subject to an environmental review process and federal, state, and local regulations that minimize post-wildfire hazard risks. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development and associated infrastructure changes could still adversely impact the environment by increasing post-wildfire hazard risk. As such, this impact is **potentially significant.**

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.7.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to minimize post-wildfire hazard risk in the County that are also applicable to the proposed project. All projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to wildfire.

The County Consolidated Fire Code provides the minimum requirements for water supply, construction design, and vegetation management, which can reduce the potential for post-wildfire hazards such as landslides and mudslides to occur. Additionally, the Consolidated Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents relating to hazardous substance releases. The County of San Diego Operational Area Emergency Operation Plan also established protocols for emergency response to multiple hazards, including those which may occur following wildfires.

Furthermore, the County of San Diego Guidelines for Determining Significance – Wildland Fire and Fire Protection (2010) requires a comprehensive analysis of wildfire risk for discretionary projects and may require the preparation of a technical report that analyzes factors such as topography, geology, combustible vegetation (fuel types), and climatic conditions and determines the appropriate fire protection measures including building design features, defensible space, and vegetation management.

General Plan Policies LU-6.10, LU-6.11, LU-10.2, M-2.5, COS-5.3, COS-12.1, S-1.3, S-1.4, S-1.5, S-8.1, and S-8.2 limit new development in areas with unstable soil, which may be particularly susceptible to post-wildfire hazard, and otherwise reduce risk of post-wildfire hazards. The 2011 General Plan EIR mitigation measures MM-Haz-4.4, MM-Hyd-3.1, MM-Hyd-3.2, MM-Hyd-3.3, MM-Hyd-6.1, MM-Tra-4.3, and MM-CC-1.12 would also be applicable to post-wildfire hazard risk.

Summary

The proposed project increases the permitted densities and expands the mobility network within the CPA, which may result in the increase of post-wildfire hazard risk. Future development projects implemented under the proposed project may also impact post-wildfire hazard risk. Future projects would be required to comply with the numerous regulations related to post-wildfire hazard risk, and discretionary permits would be evaluated according to the County's Guidelines for Determining Significance – Wildland Fire and Fire Protection. Despite these regulations and policies, impacts would be **potentially significant,** and mitigation would be required **(Impact WILD-4).**

2.7.4 Cumulative Impacts Analysis

Because of the transitory nature of wildfires, which can burn across multiple landscapes if suitable fuel is present, the geographic scope of the cumulative impact analysis for wildfire risk includes the Alpine CPA and the communities that surround Alpine, including Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura. It would also include the Viejas Reservation, which is within the Alpine CPA but is not within the jurisdiction of the County. Portions of these surrounding communities are also located in Very High FHSZs and may also be affected by the land use designation changes.

2.7.4.1 Issue 1: Adopted Emergency Response Plan or Emergency Evacuation Plan

A cumulative impact would occur on adopted emergency response or evacuation plans if future development associated with the cumulative projected growth would substantially impair an adopted emergency response or evacuation plan for wildfire or other natural disasters. Future population growth and changes to the mobility network could result in any of the following: (1) an increase in population that is induced from future development projects that are unaccounted for in existing emergency plans, (2) an increase in population that emergency response teams are unable to service adequately in the event of a disaster, or (3) evacuation route impairment if multiple development projects concurrently block multiple evacuation or access roads.

It would be considered a cumulative impact if future development in the neighboring communities and tribal lands were to similarly impair adopted emergency response or evacuation plans within the Alpine CPA. For example, if a wildfire were to spread from one of these communities into the Alpine CPA, this could strain Alpine's emergency response resources and personnel. Alternatively, if neighboring communities' emergency services and evacuation routes were to become overwhelmed by a wildfire or other hazard within those communities, Alpine's emergency resources and personnel could be impacted by hazards or evacuees that may not have been accounted for in the adopted emergency response and evacuation plans. Emergency response and evacuation would be particularly affected if cumulative growth and development would increase density in areas designated as a Very High FHSZ and/or WUI, as large, multi-jurisdictional wildfires would hinder the ability of fire and emergency personnel to respond and residents to evacuate.

Due to the substantial amount of growth and development that could occur at buildout of the Alpine CPU, there may not be sufficient infrastructure to provide adequate emergency response during wildfires. Although the Alpine CPU includes a new roadway in Subarea 5 that would help provide additional points of ingress and egress that could be used for emergency response and evacuation during a wildfire, given the unpredictable and transitory nature of wildfires, it cannot be guaranteed that adequate emergency response and evacuation would be available during a wildfire. The Alpine Fire Safe Council institutes a

Greater Alpine Community Wildfire Protection Plan and shares educational resources about fuelbreaks and defensible space programs on their website, which could reduce the likelihood that new development will impair an emergency response or evacuation plan; however, the increase in development could still pose a risk to such plans. Therefore, future development associated with the Alpine CPU, when combined with the cumulative growth and development in adjacent and surrounding communities, including tribal, state, and federal lands, would have the potential to substantially impair an adopted emergency response plan or emergency evacuation plan related to wildfire.

As described in Section 2.7.3.1, the proposed project would increase density beyond what was anticipated in the 2011 General Plan and make changes to the mobility network, potentially resulting in growth and a mobility network that were not previously anticipated in existing emergency response and evacuation plans. Although the cumulative projected growth and development must comply with existing regulations and policies, emergency response and evacuation plans within the Alpine CPA could still be substantially impaired, which would be considered a significant impact. Therefore, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a **potentially significant cumulative impact** of the proposed project (**Impact-C-WILD-1**).

2.7.4.2 Issue 2: Expose Receptors to Pollutants from Wildfire

A cumulative impact would occur if future development associated with cumulative projected growth within the Alpine CPA would increase wildfire risk and pollutant exposure within the Alpine CPA and neighboring communities. Increased population densities in areas of Very High FHSZ and/or WUI, which are prevalent in the Alpine CPA, could increase wildfire risk. The steep topography in portions of the Alpine CPA and neighboring communities exacerbates this risk and could lead to the rapid spread of wildfire beyond the boundaries of the Alpine CPA. Furthermore, particulate matter from the smoke associated with such wildfires can spread prolifically and have harmful consequences for short-term and long-term health of individuals nearby and in neighboring communities.

Conversely, communities adjacent to and surrounding the Alpine CPA would have the potential to exacerbate wildfire risk within the Alpine CPA by increasing the number of future residents in areas prone to wildfire. The risk would be potentially increased if this growth and development occurs in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. If increased development in neighboring communities resulted in a wildfire that spread to the Alpine CPA or the dissemination of airborne particulate matter and other pollutants into the Alpine CPA, this would also be considered a cumulative impact.

As described in Section 2.7.3.2, the proposed project would result in land use changes that would facilitate future, higher-density development in areas designated as a Very High FHSZ and/or WUI, including areas with steep topography and/or prevailing, down-canyon winds. Future development within these areas associated with the Alpine CPU would have the potential to exacerbate wildfire risk which, when combined with the cumulative growth and development in adjacent and surrounding communities, including tribal, state, and federal lands, could expose future residents to pollutant concentrations from wildfire or the uncontrolled spread of wildfire. Although the cumulative projected growth and development must comply with existing regulations and policies, wildfire risk and exposure to pollutants within the Alpine CPA could still be substantial, which would be considered a significant impact. Therefore, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a **potentially significant cumulative impact** of the proposed project (**Impact-C-WILD-2**).

2.7.4.3 Issue 3: Exacerbate Wildfire Risk from Infrastructure

Cumulative growth and development in the communities adjacent to and surrounding the Alpine CPA, including tribal, state, and federal lands, within areas designated as a Very High FHSZ and/or WUI would have the potential to exacerbate wildfire risk by increasing the number of future residents in areas prone to wildfire. Due to the generally rural nature of these communities, it is anticipated that new or expanded infrastructure would be required to accommodate new growth. Infrastructure improvements would likely include the paving of new roads and the extension of utility services such as electrical power lines. Electrical power lines are required to be undergrounded; however, Board of Supervisor's Policy I-92 provides criteria to waive the requirement within the unincorporated County (County of San Diego 2019). This policy allows the complete or partial undergrounding of utilities to be waived when undergrounding of utilities would be impossible or impractical. These improvements would likely increase the chance of wildfires within neighboring communities and the Alpine CPA. Providing new and/or improved roads would allow greater access to previously inaccessible, less developed areas, while providing new electrical services would increase the possibility of downed power lines during Santa Ana weather events.

A cumulative impact would occur if future development associated with cumulative projected growth within the Alpine CPA would result in the expansion or development of emergency services infrastructure, which could adversely impact the environment. The proposed project would result in land use changes that would facilitate future high-density development in areas designated as a Very High FHSZ and/or WUI, which would require new or expanded infrastructure in the less developed subareas (i.e., Subareas 4 and 5). Future development and the installation of associated infrastructure within these subareas, when combined with the cumulative growth and development in adjacent and surrounding communities, including tribal, state, and federal lands, would exacerbate wildfire risk and could result in adverse environmental impacts within the Alpine CPA and neighboring communities.

As described in Section 2.7.3.3, the proposed project would result in land use and mobility network changes, which could require the expansion or development of emergency services infrastructure. This could result in adverse environmental impacts. Although the cumulative projected growth and development must comply with existing regulations and policies, wildfire risk and the environment could potentially be adversely impacted by expanded emergency services infrastructure. Therefore, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a **potentially significant cumulative impact** of the proposed project (**Impact-C-WILD-3**).

2.7.4.4 Issue 4: Expose People or Structures to Significant Risks from Post-Wildfire Hazards

A cumulative impact would occur if future development associated with cumulative projected growth within the Alpine CPA would expose people or structures to significant risks from post-wildfire hazards within the Alpine CPA or neighboring communities. A majority of the Alpine CPA (approximately 50 percent) contains areas with slopes greater than 25 percent, including areas with proposed land use changes, and contains fire-prone vegetation. Subareas 4 and 5 are situated in areas with substantial topographical changes, with the Sweetwater River valley bordering Subarea 5 to the south, and they contain large swaths of fire-prone vegetation such as chaparral and coastal sage scrub, making them particularly susceptible to post-fire hazards such as debris flows, landslides, and slope instability. Additionally, the western portion of Subarea 5 is within the burn area of the West Fire, which burned approximately 504 acres and destroyed 56 structures in 2018. By increasing density in these subareas, the proposed project would both potentially exacerbate wildfire risk and increase risks to life and

property by placing a substantial number of new housing units and residents in an area prone to wildfire and susceptible to post-fire hazards. Future development within these areas, when combined with the cumulative growth and development in adjacent and surrounding communities, including tribal, state, and federal lands, would exacerbate wildfire risk and associated post-fire hazards within the Alpine CPA and neighboring communities.

The most common and destructive post-wildfire hazards include downslope or downstream flooding, landslides, and debris flows, which typically result from runoff, post-fire slope instability, and/or drainage changes. These hazards pose a risk to life and property due to their sudden occurrence; extreme force; and ability to strip vegetation, block drainages, and damage infrastructure. Future growth and development in the communities adjacent to and surrounding the Alpine CPA within areas designated as a Very High FHSZ and/or WUI would have the potential to exacerbate wildfire risk by increasing the number of future residents in areas prone to wildfire and post-wildfire hazards. In the event of a large wildfire that burns over areas of steep slopes, downslope residents would be particularly susceptible to post-wildfire hazards. Because cumulative growth and development within the communities adjacent to and surrounding the Alpine CPA, including tribal, state, and federal lands, would have the potential to exacerbate wildfire risk within the Alpine CPA, cumulative impacts associated with exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes would be significant.

As described in Section 2.7.3.4, the land use designation and mobility network changes within the proposed project would have the potential to expose people or structures to significant risks of post-wildfire hazards. Although the cumulative projected growth and development must comply with existing regulations and policies, post-wildfire hazard risk could potentially be adversely impacted. Therefore, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a **potentially significant cumulative impact** of the proposed project (**Impact-C-WILD-4**).

2.7.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects would result in potentially significant direct and cumulative impacts to wildfire risk.

Impact-WILD-1: Substantially Impair an Adopted Emergency Response or Evacuation Plans. There is the potential that emergency response and evacuation would be insufficient during wildfires due to the substantial potential growth that could occur under the Alpine CPU. Consequently, this growth could substantially impair existing emergency response and evacuation plans, potentially increasing the risk to loss of life and property in the event of a wildfire. This would be considered a significant impact.

Impact-WILD-2: Expose Receptors to Pollutants from Wildfire. Future development associated with the Alpine CPU would have the potential to exacerbate wildfire risk by introducing a substantial number of new residents to less developed areas of the community, who in turn could be exposed to pollutant concentrations in the event of a wildfire. This would be considered a significant impact.

Impact-WILD-3: Exacerbate Wildfire Risk from New Infrastructure. Future development associated with the Alpine CPU within the less developed subareas would likely require paving of new roads to improve emergency services and evacuation access or paving over existing dirt roads and the extension of utilities such as electrical power lines. Areas of increased density and land use intensity are located within the village boundary (Subareas 2 and 6), directly south of a new fire station, and an area adjacent to the current primary evacuation route (Subarea 4). However, most wildfires are started near developed

areas and roads, so future development and associated infrastructure within these areas would have the potential to exacerbate wildfire risk, which would be a potentially significant impact.

Impact-WILD-4: Expose People or Structures to Significant Risks from Post-Wildfire Hazards. The proposed project would both potentially exacerbate wildfire risk and increase risks to life and property by placing a substantial number of new housing units and residents in an area prone to wildfire and susceptible to post-fire hazards. Consequently, the proposed project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes. This would be considered a significant impact.

Impact-C-WILD-1: Result in a Cumulatively Considerable Contribution to the Impairment of an Adopted Emergency Response or Evacuation Plans. The proposed project would cause a greater impact related to the impairment of Adopted Emergency Response or Evacuation Plans compared to existing conditions and the impact identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-WILD-2: Result in a Cumulatively Considerable Contribution to the Exposure of Receptors to Pollutants from Wildfire. The proposed project would cause a greater impact related to the exposure of receptors to pollutants from wildfire compared to existing conditions and the impacts identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-WILD-3: Result in a Cumulatively Considerable Contribution the Exacerbation of Wildfire Risk from New Infrastructure. The proposed project would cause a greater impact related to the exacerbation of wildfire risk from new infrastructure compared to existing conditions and the impacts identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-WILD-4: Result in a Cumulatively Considerable Contribution to On- or Off-site Flooding. The proposed project would cause a greater impact related to the exposure of receptors to pollutants from wildfire compared to existing conditions and the impacts identified in the 2011 General Plan EIR. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.7.6 Mitigation

2.7.6.1 Issue 1: Adopted Emergency Response Plan or Emergency Evacuation Plan

The following 2011 General Plan EIR and Alpine CPU specific mitigation measures would reduce **Impact-WILD-1** and **Impact-C-WILD-1,** impair adopted emergency response plan or evacuation plan, but not to below a significant level. Therefore, these impacts would be **significant and unavoidable**.

2011 General Plan EIR Mitigation Measures

The following 2011 General Plan EIR mitigation measures are being carried forward and shall apply to the proposed project: MM-Haz-3.1 through MM-Haz-3.3, MM-Haz-4.4, MM-Pub-1.5, and MM-Tra-4.1 through MM-Tra-4.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on emergency response and evacuation plans.

Alpine Community Plan Update Mitigation Measures

MM-WILD-1: As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if subsequent projects are located within a High or Very High FHSZ. Subsequent projects within these zones would be required to prepare an Fire Protection Plan that is subject to the review and approval of the Alpine Fire Protection District and the San Diego County Fire Authority. Prior to preparation of an FPP, subsequent projects shall coordinate with appropriate fire agencies to ensure that modeling of the FPP and design of the project is appropriate to meet the Fire Adapted Communities Strategy. The FPP shall assess a project's compliance with current regulatory codes and ensure that impacts resulting from wildland fire hazards have been adequately mitigated. The FPP shall identify evacuation routes within the vicinity of the project site and those routes shall not impair the ability of surrounding development to evacuate. Prepared FPPs for projects within 1 mile of the CNF, shall be provided to CNF for review.

MM-WILD-2: As a part of the discretionary review of subsequent projects that have an occupancy of 200 or more people, proposed under the Alpine CPU, an Evacuation Plan would be required. The Evacuation Plan shall be consistent with the community-wide evacuation plans that are part of the Alpine Community Wildfire Protection Plan that has been prepared by the Alpine Fire Safe Council. Evacuation Plans shall include analysis regarding the evacuation capabilities, improving on- and off-site roadways, and any improvements necessary to handle the egress and ingress during an evacuation.

MM-WILD-3: As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, identify the adequacy of the access and evacuation routes relative to the degree of development or use (including but not limited to road width, road type, length of dead-end roads, and turnouts). If the routes are determined to be inadequate as part of this review, the Fire Authority Having Jurisdiction (FAHJ) will identify the required improvements to be made.

No other feasible mitigation measures are available.

2.7.6.2 Issue 2: Expose Receptors to Pollutants from Wildfire

The following 2011 General Plan EIR and Alpine CPU specific mitigation measures would reduce **Impact-WILD-2** and **Impact-C-WILD-2,** exposure to pollutants from wildfire, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

- The following measures were considered in attempting to reduce impacts associated with exposing receptors to pollutants from wildfire to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.
- Require development guidelines to be prepared and incorporated into the Alpine Community Plan that would limit the amount of future development in order to reduce hazards associated with wildland fires.

  Explanation: This measure would be infeasible because restrictions on the type or amount of development within the Alpine community would conflict with areas identified for increased growth under the Alpine CPU. In addition, the measure would also conflict with goals of the

General Plan Housing Element to provide sufficient housing stock and accommodate a reasonable share of regional growth.

- Substantially reduce planned densities in areas of concern.

  Explanation: This measure would be infeasible because the majority of Alpine CPU is located in areas of concern for wildland fires. Implementation of this mitigation measure would result in significant growth restrictions in areas identified for increased growth for the proposed project. In addition, this measure would conflict with goals of the General Plan Housing Element to provide sufficient housing stock and accommodate a reasonable share of regional growth.

- Approve only development that is located in SRAs that are considered to have a moderate fire hazard.

  Explanation: This measure would be infeasible because the Alpine CPU is classified as having a higher than moderate risk for wildland fires under SRAs. Implementation of this mitigation measure would result in significant growth restrictions in areas identified for increased growth in the Alpine CPU. In addition, this measure would conflict with goals of the General Plan Housing Element to provide sufficient housing stock and accommodate a reasonable share of regional growth.

- Require extensive fuel modification around existing and future development in wildland areas.

  Explanation: This measure would be infeasible because it would substantially impact the environment by damaging biological resources, altering drainage patterns, causing erosion, and modifying the visual landscape. This would conflict with the objective to encourage development in a manner that sustains the natural setting and qualities that distinguish Alpine while allowing for growth.

2011 General Plan EIR Mitigation Measures

The following 2011 General Plan EIR mitigation measures are being carried forward and shall apply to the proposed project: MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Hyd-3.2, MM-Pub-1.4, MM-Pub-1.7, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's potential to expose receptors to pollutants from wildfire.

Alpine Community Plan Update Mitigation Measures

Alpine-specific mitigation measures MM-WILD-1, MM-WILD-2, and MM-WILD-3 described above in Section 2.7.6.1, would further reduce the proposed project's potential to expose receptors to pollutants from wildfire.

No other feasible mitigation measures are available.

2.7.6.3 Issue 3: Exacerbate Wildfire Risk from Infrastructure

The following 2011 General Plan EIR and Alpine CPU specific mitigation measures would reduce **Impact-WILD-3** and **Impact-C-WILD-3,** exacerbate wildfire risk from infrastructure, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

- The infeasible mitigation measures identified above under Section 2.7.6.2 would apply. They were considered in attempting to reduce impacts associated to exacerbating wildfire risk from infrastructure to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.

2011 General Plan EIR Mitigation Measures

The following 2011 General Plan EIR mitigation measures are being carried forward and shall apply to the proposed project: MM-Haz-4.1, MM-Haz-4.3, MM-Haz-4.4, MM-Lan-1.2, MM-Pub-1.3 through MM-Pub-1.6, MM-Pub-1.8, MM-Tra-1..4, and MM-Tra-4.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's potential to exacerbate wildfire risk from infrastructure.

Alpine Community Plan Update Mitigation Measures

Alpine-specific mitigation measures MM-WILD-1, MM-WILD-2, and MM-WILD-3, described above in Section 2.7.6.1, would further reduce the proposed project's potential to exacerbate wildfire risk from expanded infrastructure.

No other feasible mitigation measures are available.

2.7.6.4 Issue 4: Expose People or Structures to Significant Risks from Post-Wildfire Hazards

The following 2011 General Plan EIR and Alpine CPU specific mitigation measures would reduce **Impact-WILD-4** and **Impact-C-WILD-4,** exposure to post-wildfire hazards, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

Infeasible Mitigation Measures

- The infeasible mitigation measures identified above under Section 2.7.6.2 would apply. They were considered in attempting to reduce impacts associated with exposing people or structures to significant risks from post-wildfire hazards to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.

2011 General Plan EIR Mitigation Measures

The following 2011 General Plan EIR mitigation measures are being carried forward and shall apply to the proposed project: MM-Haz-4.4, MM-Hyd-3.1, MM-Hyd-3.2, MM-Hyd-3.3, MM-Hyd-6.1, MM-Tra-4.3, and MM-CC-1.12 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's potential to expose people or structures to significant risk of post-wildfire hazards.

Alpine Community Plan Update Mitigation Measures

Alpine-specific mitigation measures MM-WILD-1, MM-WILD-2, and MM-WILD-3, described above in Section 2.7.6.1, would further reduce the proposed project's potential to expose people or structures to significant risk of post-wildfire hazards.

No other feasible mitigation measures are available.

2.7.7 Conclusion

2.7.7.1 Issue 1: Adopted Emergency Response Plan or Emergency Evacuation Plan

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, potentially resulting in an increase in density and associated housing units at buildout. Because the proposed project consists of an update to the existing Alpine Community Plan, the growth associated with the Alpine CPU is not accounted for in current emergency response planning documents. Given the unpredictable and transitory nature of wildfires, which can burn across multiple landscapes if suitable fuel is present, it cannot be guaranteed that adequate emergency response and evacuation would be available during a wildfire. As a result, there is a potential that emergency response and evacuation would be insufficient during wildfires due to the substantial potential growth that could occur in these areas. Therefore, implementation of the proposed project could substantially impair existing emergency response and evacuation plans, potentially increasing the risk to loss of life and property in the event of a wildfire. This would be considered a significant impact (**Impact-WILD-1).** The proposed project in conjunction with subsequent projects could also result in a potentially significant cumulative impact **(Impact-C-WILD-1**)**.** Implementation of the adopted General Plan policies identified in Section 2.7.2.1; 2011 General Plan EIR mitigation measures identified in Section 2.7.6.2; and Alpine CPU mitigation measures **MM-WILD-1, MM-WILD-2, and MM-WILD-3** identified in Section 2.7.6.1 would reduce **Impact-WILD-1** and **Impact-C-WILD-1**, but not below a level of significance for the reasons described in those sections. Therefore, these impacts would be **significant and unavoidable** and **cumulatively considerable**.

2.7.7.2 Issue 2: Expose Receptors to Pollutants from Wildfire

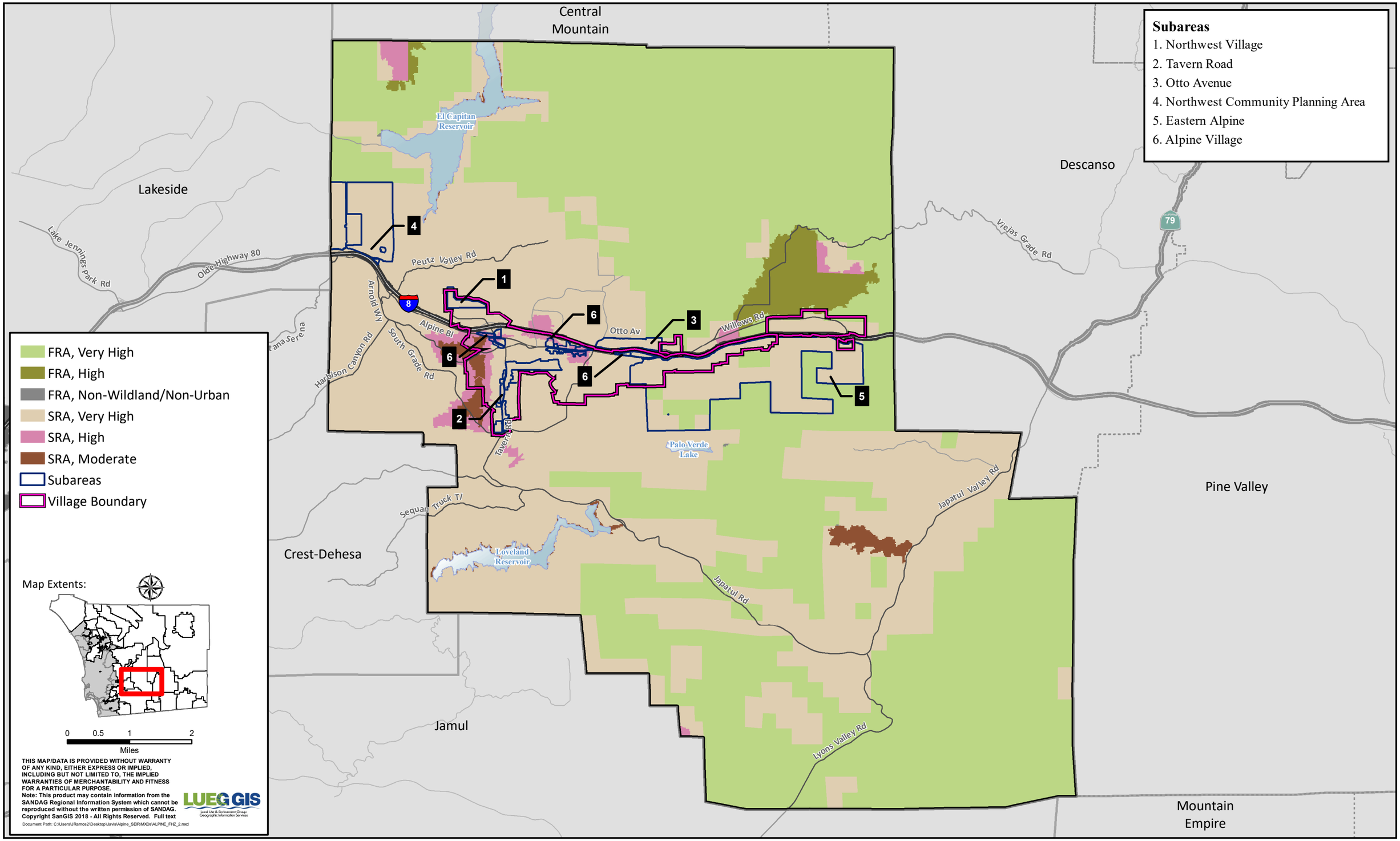
The proposed project would change density within four of seven subareas, including areas designated as a Very High FHSZ and/or WUI. The majority of the Alpine CPA (approximately 50 percent) contains areas with slopes greater than 25 percent. As such, future development within these areas would have the potential to exacerbate wildfire risk by introducing a substantial number of new residents, who in turn could be exposed to pollutant concentrations such as particulate matter in the event of a wildfire. This would be considered a potentially significant impact (**Impact-WILD-2**). When combined with the cumulative growth and development in adjacent and surrounding communities, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a potentially significant cumulative impact (**Impact-C-WILD-2**). Implementation of the adopted General Plan policies identified in Section 2.7.2.1, 2011 General Plan EIR mitigation measures identified in Section 2.7.6.2, and Alpine CPU mitigation measures **MM-WILD-1, MM-WILD-2, and MM-WILD-3** would reduce **Impact-WILD-2** and **Impact-C-WILD-2**, but not below a level of significance for the reasons described in those sections. Therefore, these impacts would be **significant and unavoidable** and **cumulatively considerable**.

2.7.7.3 Issue 3: Exacerbate Wildfire Risk from New Infrastructure

To accommodate the growth associated with buildout of the Alpine CPU, it is anticipated that new or expanded infrastructure would be required, such as the extension of roads and utility services. The construction of new roads and extension of utilities into previously undeveloped areas would increase wildfire risk because most wildfires are started near developed areas and roadways. As such, future development and associated infrastructure within these subareas would have the potential to exacerbate wildfire risk, which would be considered a potentially significant impact (**Impact-WILD-3**). When combined with cumulative growth and development in adjacent and surrounding communities, the proposed project's contribution to this impact would be cumulatively considerable and would be considered a potentially significant cumulative impact (**Impact-C-WILD-3**). Implementation of the adopted General Plan policies identified in Section 2.7.2.1, 2011; General Plan EIR mitigation measures identified in Section 2.7.6.3; and Alpine CPU mitigation measures **MM-WILD-1, MM-WILD-2, and MM-WILD-3** would reduce **Impact-WILD-3** and **Impact-C-WILD-3**, but not below a level of significance for the reasons described in those sections. Therefore, these impacts would be **significant and unavoidable** and **cumulatively considerable**.

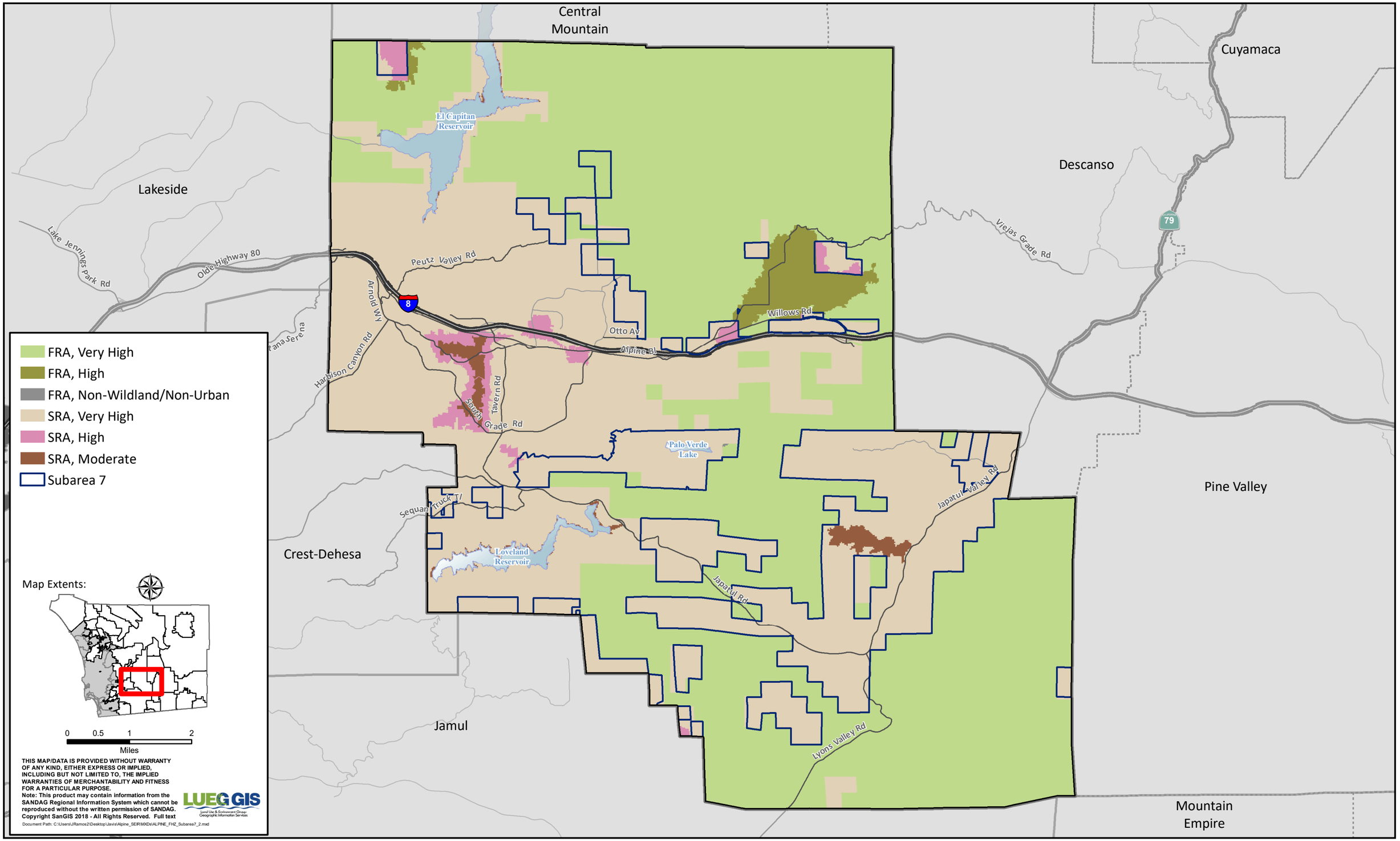
2.7.7.4 Issue 4: Expose People or Structures to Significant Risks from Post-Wildfire Risks

A majority of the Alpine CPA (approximately 50 percent) contains areas with slopes greater than 25 percent, including areas with proposed land use changes, and contains fire-prone vegetation such as chaparral and coastal sage scrub. By increasing density in these areas, the proposed project would both potentially exacerbate wildfire risk and increase risks to life and property by placing a substantial number of new housing units and residents in an area prone to wildfire and susceptible to post-fire hazards. This would be considered a potentially significant impact (**Impact-WILD-4**). When combined with the cumulative growth and development in adjacent and surrounding communities, the proposed project's contribution to this impact would be cumulatively considerable and would result in a potentially significant cumulative impact (**Impact-C-WILD-4**). Implementation of the adopted General Plan policies identified in Section 2.7.2.1; 2011 General Plan EIR mitigation measures identified in Section 2.7.6.4; and Alpine CPU mitigation measures **MM-WILD-1, MM-WILD-2, and MM-WILD-3** would reduce **Impact-WILD-4** and **Impact-C-WILD-4**, but not below a level of significance for the reasons described in those sections. Therefore, these impacts would be **significant and unavoidable** and **cumulatively considerable**.



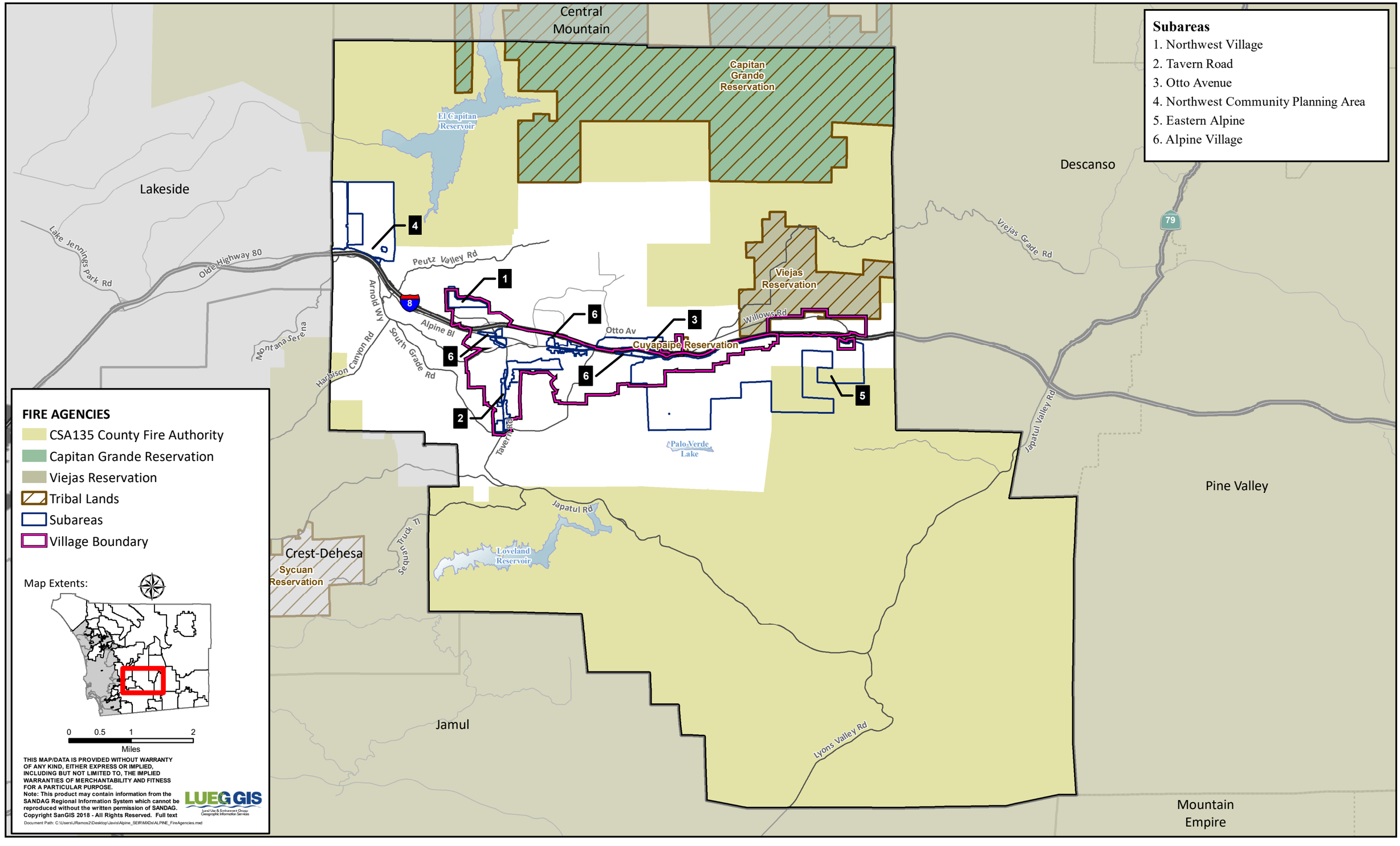
Source: SanGIS, County of San Diego, 2019

Figure 2.7-1a
Alpine Community Plan Area
Fire Hazard Severity Zones
Subareas 1-6



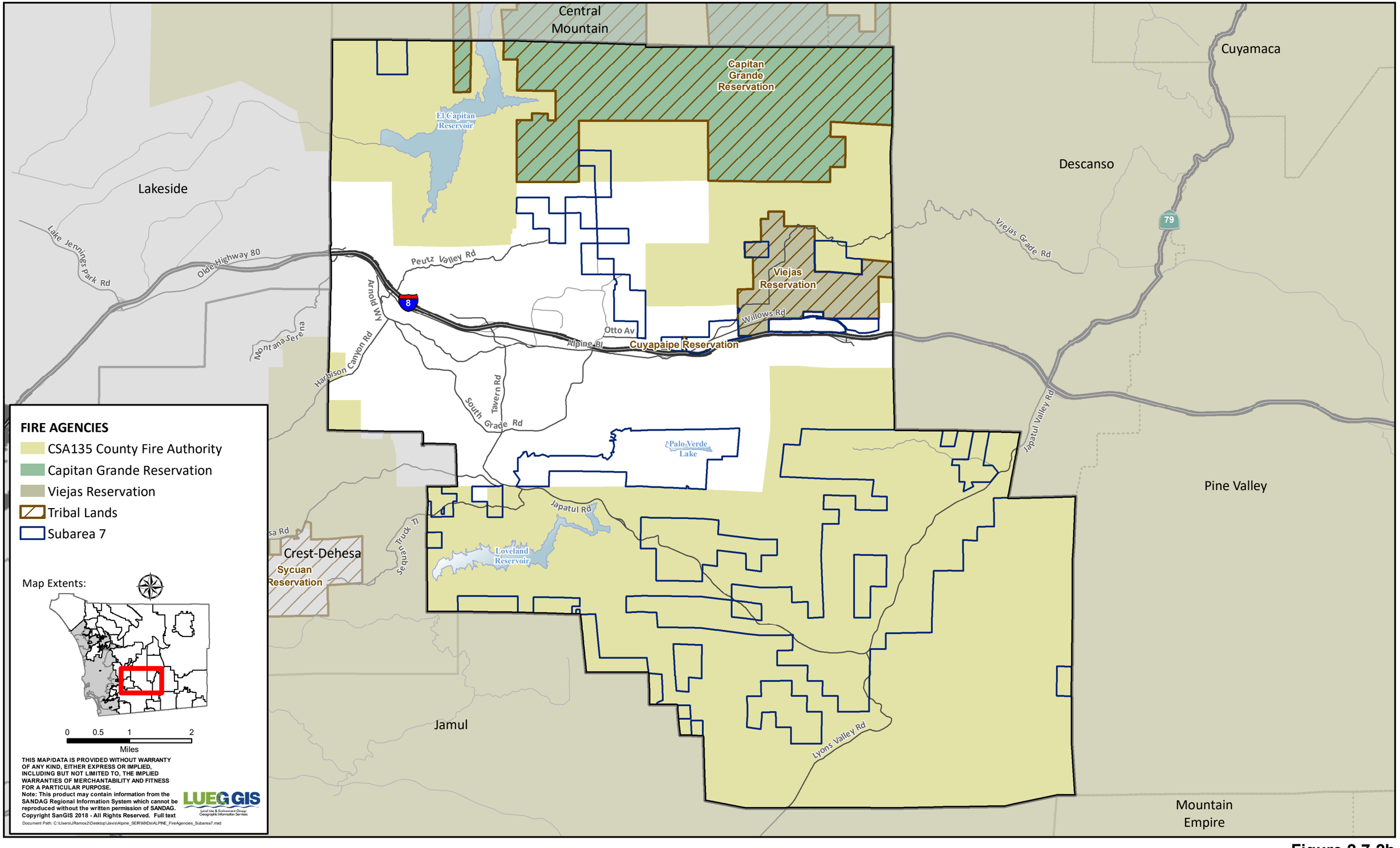
Source: SanGIS, County of San Diego, 2019

Figure 2.7-1b
Alpine Community Plan Area
Fire Hazard Severity Zones
Subarea 7



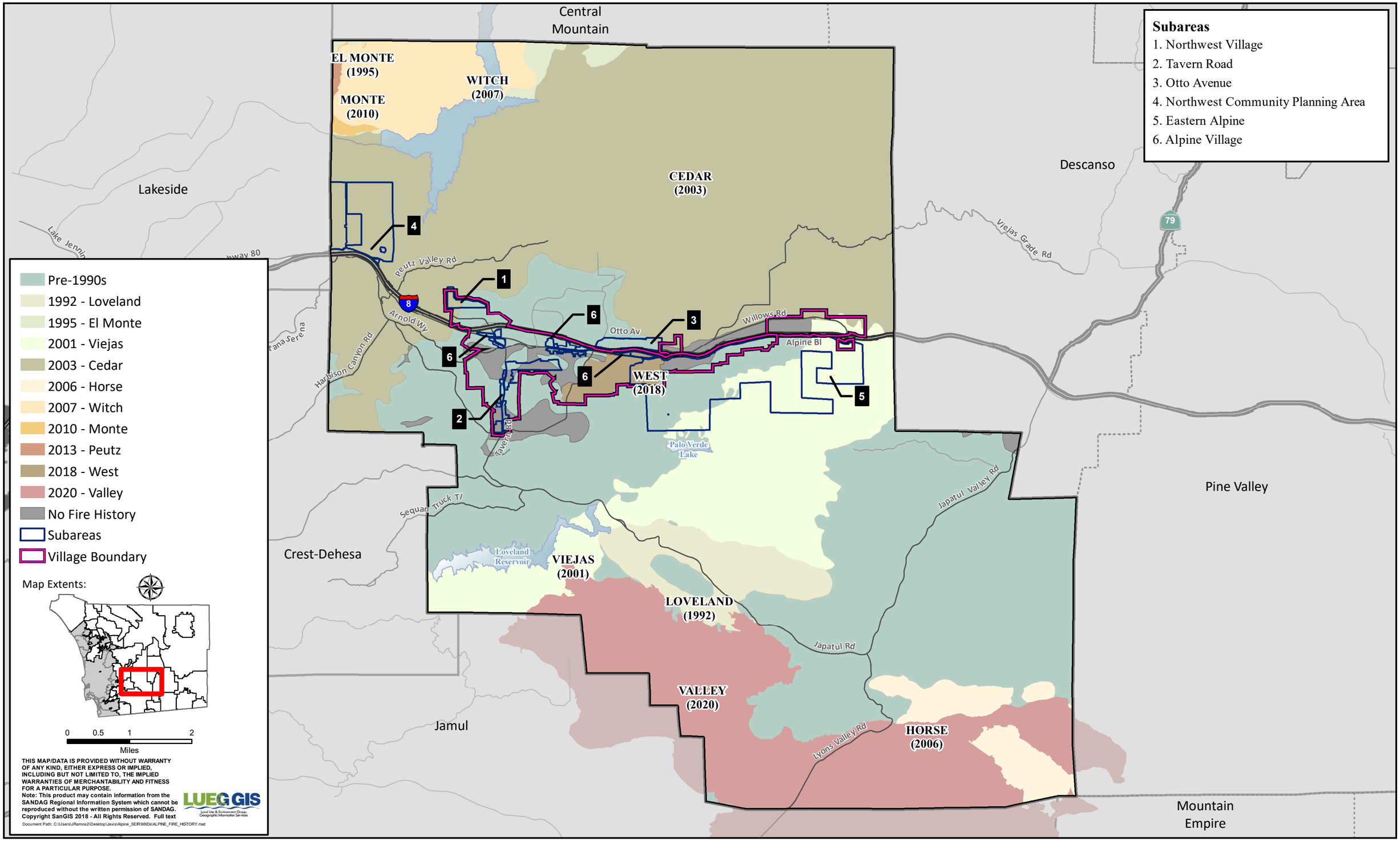
Source: SanGIS, County of San Diego, 2020

Figure 2.7-2a
Alpine Community Plan
Fire Agency Jurisdictions
Subareas 1-6



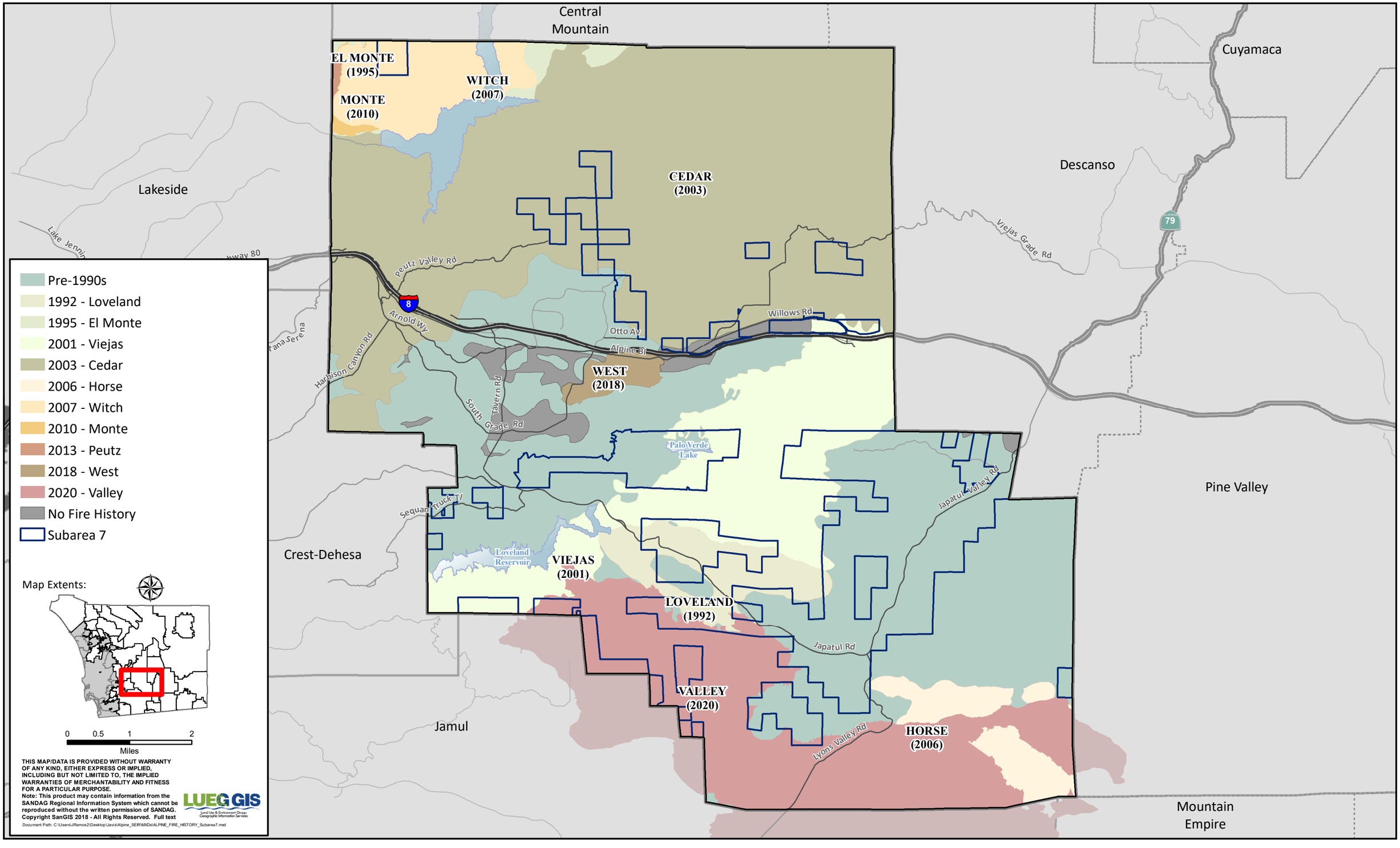
Source: SanGIS, County of San Diego, 2020

Figure 2.7-2b
Alpine Community Plan
Fire Agency Jurisdictions
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.7-3a
Historic Fires
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.7-3b
Historic Fires
Subarea 7

ALPINE AREA EVACUATION MAP

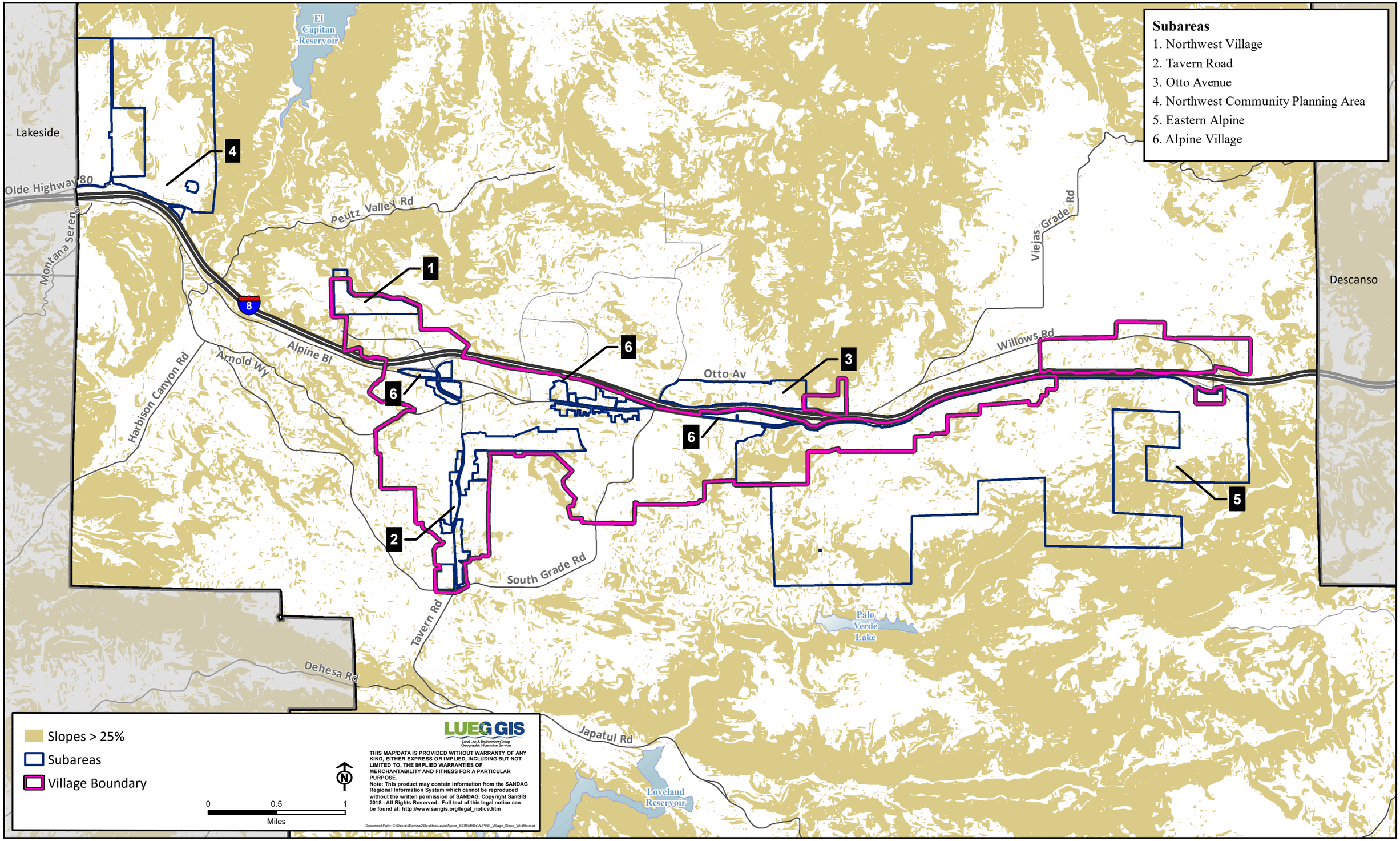
TO SAN DIEGO
TO EL CENTRO
TO EL CAJON
TO JAMUL

EL MONTE
QUAIL CANYON
RESERVOIR
TOYA
HAWLEY
SILVA
BRIDON
EL CAPITAN RESERVOIR
ANITA
KUMEYAI
BOUNDARY
IPAI
SIMON
VIA ARTURO
CHIQUITA
PUBLIC
LAKE JENNINGS
TELKAIF
RANCH TRAIL
BOND
BLOSSOM VALLEY
SHANTEAU
OLDE HIGHWAY 80
PEUTZ VALLEY
SHALYN
SOUDIN
RIDGE ROLL
RUIS
BULLARD
RESERVOIR 25TH
COLUMBINE
VICTORIA
SNEATH
HOLLY
ACACIA
POLK
BROWNS
RED OAK
VIEJAS
VIEJAS GRADE
OAKS OWL
WILLOWS
ALPINE
FARLIN
OLD RANCH
CAMPBELL RANCH
MC CLAIN
TRACEY
HARBISON CANYON
GLEN OAKS
MIDWAY
ARNELL
OLIVEWOOD
PIMLICO
ELTINGE
OTTO
BLACKWOLF
PINE VIEW
VIEJAS CREEK
STAR VALLEY
LA FORCH
FOSS
SOUTH GRADE
TAVERN
PONDEROSA
ALPINE TRAIL
CORINE
LILAC
DENOVA
TOMPAU
VIA VIEJAS
OLD SPUR
SPANISH BIT
RALO VERDE LAKE
BELL BLUFF TRUCK
KENT
LAKE VIEW
HORSEMILL
MOUNTAIN VIEW
ALMYRA
PATRICK
SILVERBROOK
LA CRESTA
SCENIC
AL BAHR
SAXTON
ALTA
LENNY
CREST
SUNCREST
DEHESA MTN
JAPATUL
SEQUAN TRUCK
TESTIGO
JAPATUL VALLEY
LARRY
WILLSON
RIGGS
CASINO
QUAIL HAVEN
SYCUAN
LOVELAND RESERVOIR
DEHESA
WILLOW GLEN
HIDDEN GLEN
PARK
JAPATUL SPUR
SPIRIT
CARVEACRE
LOST
OLD OAK
LYONS VALLEY
HORSETHIEF
SLOANE CANYON
WEST BOUNDARY
OAK
CHOUKAIR
RAY
LA SELVA
MIKE
LAWSON VALLEY
LAWSON HILLS
BUNNY
LUCITA
MAGUAY
EMILY
HILARY
MARK LEE
RUDNICK
BEAVER HOLLOW
CASTLE PEAK
WOOD VALLEY
DEVON
ALTA LOMA
JAMUL
BABEL
SKYLINE TRUCK

LEGEND

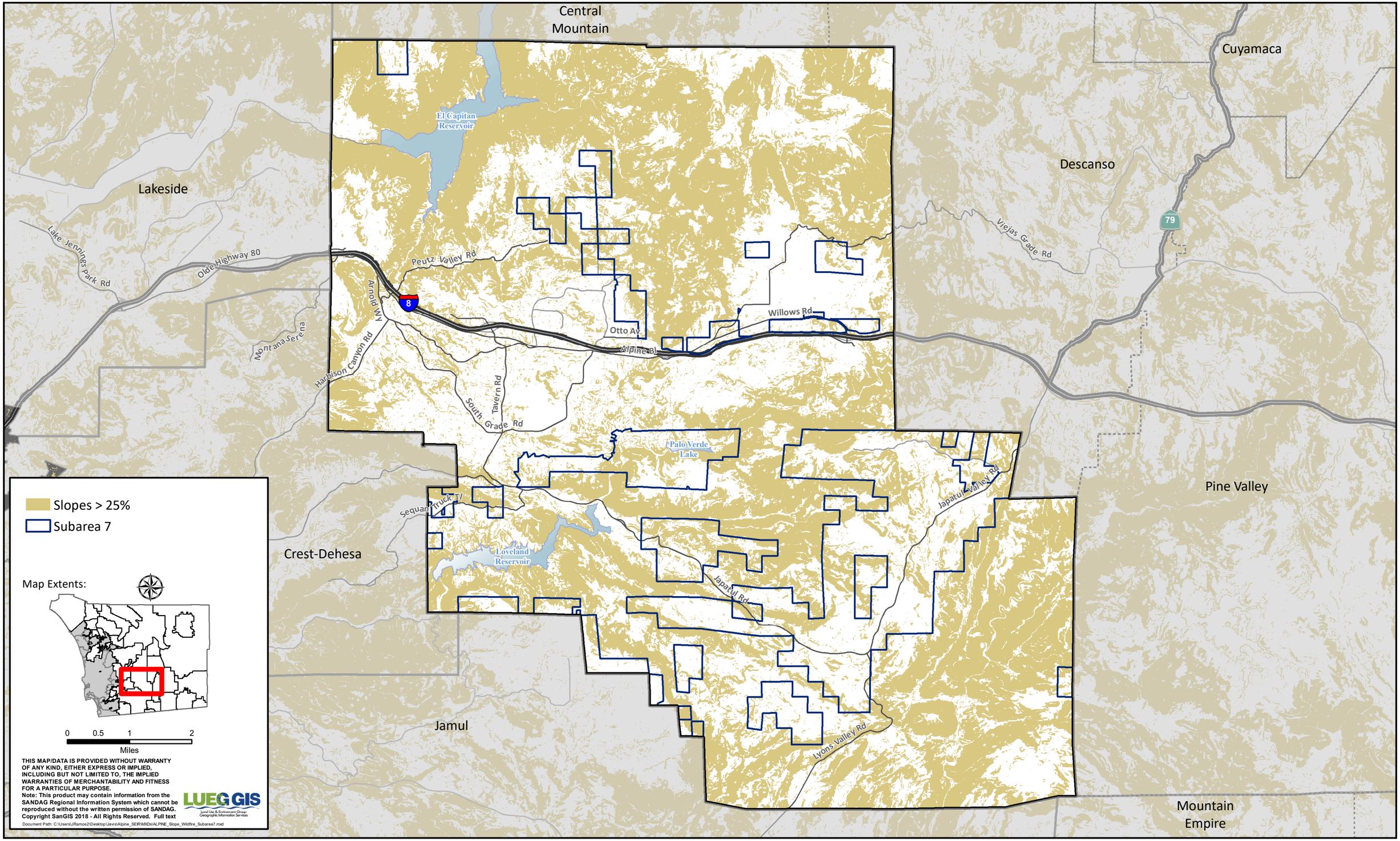
- Main Evacuation Roads
- Freeway
- Fire Station
- School
- Sheriff Station

Figure 2.7-4
Alpine Area Evacuation Map



Source: SanGIS, County of San Diego, 2020

Figure 2.7-5a
Slopes Greater Than 25%
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.7-5b
Slopes Greater Than 25%
Subarea 7

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2.8 Hydrology and Water Quality

This section of the Supplemental Environmental Impact Report (SEIR) describes hydrology and water quality, including the existing groundwater resources, surface water resources, stormwater drainage systems, groundwater quality, surface water quality, and flooding and dam inundation areas within the Alpine Community Plan Area (CPA) and any changes to the physical environment that could occur as a result of implementation of the Alpine Community Plan Update (CPU).

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (FCI EIR) (referred to throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA with the exception of the FCI lands, which were subsequently analyzed under the FCI EIR. These prior EIRs both have similar significance statements related to hydrology and water quality.

Table 2.8-1 summarizes the impact conclusions identified in this section.

Table 2.8-1. Hydrology and Water Quality Summary of Impacts

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
HYD-1	Violate Water Quality Standards and Requirements	Significant and Unavoidable	Potentially Significant	Potentially Significant	Less Than Significant
HYD-2	Deplete Groundwater Supplies	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
HYD-3	Result in Erosion and Siltation	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
HYD-4	Flooding	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
HYD-5	Stormwater Systems	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
HYD-6	100-Yr Flood Hazard	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
HYD-7	Flood Flows	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
HYD-8	Dam Inundation and Flood Hazard	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
HYD-9	Seiche, Tsunami, and Mudflow Hazards	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant

2.8.1 Existing Conditions

This section discusses the existing hydrology and water quality in the Alpine CPA. Impaired water bodies within the CPA are discussed in Table 2.8-2. The hydrology and water quality described in the prior EIRs are the same as the existing conditions evaluated in this SEIR.

2.8.1.1 Surface Water Hydrology

San Diego County's surface waters are characterized by estuaries, lagoons, bays, lakes, reservoirs, rivers, and creeks. These water bodies capture the flow of the region's surface water runoff and become a blend of natural runoff and imported water. Many support natural habitat and recreational areas in addition to acting as storage reservoirs for the County's water supply. Figures 2.8-3a and 2.8-3b show the location of surface waters including streams, rivers, lakes, and reservoirs within the Alpine CPA.

A watershed is an area of land that drains to a common waterway, such as a stream, lake, estuary, wetland, aquifer, or ocean. Watershed Management Areas (WMAs) are grouped according to hydrologic units (HUs) and have been developed to implement federal and state statutes for the management of water quality in the region. The northern portion of the Alpine CPA is within the San Diego River WMA and the southern portion is within the San Diego Bay WMA. These WMAs are described below.

The San Diego River WMA, which covers 277,543 acres, contains the San Diego River, Boulder Creek, El Capitan Reservoir, San Vicente Reservoir, Santee Lakes, Boulder Creek, and Lake Murray. Much of the impounded water in the reservoirs is used to serve population centers within the County, including the Alpine CPA. The watershed is drained by the San Diego River, which discharges into the Pacific Ocean between Mission Beach and Ocean Beach in the City of San Diego. Average annual precipitation ranges from 10.5 inches near the coast to nearly 35 inches in the eastern portion of the watershed. Approximately 74 percent of the San Diego River WMA is in the unincorporated County.

The southern portion of the Alpine CPA is within the San Diego Bay WMA, which covers 282,580 acres and consists of three major watersheds: Pueblo San Diego, Sweetwater, and Otay. The southern portion of the Alpine CPA falls within the Sweetwater Watershed of the San Diego Bay WMA, which encompasses over 148,000 acres. The Sweetwater Watershed includes one HU (Sweetwater) and three hydraulic areas: Lower Sweetwater, Middle Sweetwater, and Upper Sweetwater. The southern portion of the Alpine CPA is within the Upper Sweetwater hydraulic area. Major water bodies within the Sweetwater Watershed include the Sweetwater River, Sweetwater Reservoir, Loveland Reservoir, and San Diego Bay. Rainfall in this watershed widely varies from 10.5 inches near the coast to approximately 35 inches in the far inland areas. Rainfall in Alpine ranges from approximately 17 inches to 24 inches, annually (County DPLU 2004).

2.8.1.2 Groundwater Hydrology

San Diego County overlies a complex groundwater resource that varies greatly throughout the region. Section 2.8.1.1 of the 2011 General Plan EIR includes a discussion of aquifer characteristics and is

incorporated by reference. The County has three general categories of aquifers: fractured rock aquifers, alluvial and sedimentary aquifers, and desert basin aquifers. The Alpine CPA contains fractured rock aquifers and alluvial and sediment aquifers but does not contain desert basin aquifers.

The majority of groundwater flow and storage within the Alpine CPA is in a fractured crystalline rock aquifer area. Fractured rock aquifers are present in the foothills and mountainous regions of the County, including the Alpine CPA, where precipitation is higher than in regions with lower elevations. Fractured rock aquifers typically have much less storage capacity than alluvial or sedimentary aquifers. Additionally, due to the low storage capacity, recharge to fractured rock aquifers can cause relatively fast rises to the water table, which conversely can have relatively fast declines to the water table from groundwater pumping in years without significant recharge.

An alluvial aquifer is located adjacent to Subarea 5 and Subarea 2, as shown on Figures 2.8-1a and 2.8-1b. Alluvial aquifers are characterized as structural depressions formed by folding and faulting and/or the effects of differential weathering of rocks often creating incised valleys. These depressions, which are typically bounded by relatively impermeable rocks, are subsequently filled by fine-grained alluvial sediments deposited by streams and rivers. Groundwater typically occurs within the pore spaces of these sediments.

Aquifers with limited groundwater in storage (e.g., fractured rock aquifers) and/or limited groundwater recharge (e.g., desert areas) may experience shortages from large groundwater users, such as water companies or districts, agriculture, or other large operations. Groundwater supply well yields within the Alpine CPA are shown in Figures 2.8-2a and 2.8-2b. Wells in a fractured rock aquifer typically yield relatively low volumes of water. Wells in an alluvial or sedimentary aquifer often yield higher volumes of water when compared with fractured rock aquifers. Within alluvial aquifers, coarse-grained sediments such as sand and gravel typically produce higher volumes of water than finer-grained sediments such as silts and clays. In coarse-grained sediments, well yields may be hundreds of gallons per minute and limited by inefficiencies in the well itself, rather than by limitations in the aquifer's ability to produce water.

Because production wells for residential and agricultural water uses are not metered or regulated for water quantity by the County, future localized groundwater problems are possible throughout the County from large quantity groundwater users. In addition, areas developed prior to implementation of the County's Groundwater Ordinance may have been developed at densities higher than would be currently allowed. This has resulted in the clustering of groundwater demand from relatively dense development, making these areas susceptible to localized groundwater problems.

Potable water in the Alpine CPA is provided by both water districts and groundwater from residential wells. The central-western portion of the Alpine CPA is within the San Diego County Water Authority (SDCWA) service boundary, while the remainder of the Alpine CPA is entirely dependent on groundwater. While the SDCWA does not directly provide water service to the Alpine CPA, it is a wholesale water supplier to water districts that serve the community. Padre Dam Municipal Water District, a member agency of the SDCWA, provides water service within the central-western portion of the Alpine CPA. Within the proposed project area, the Padre Dam Municipal Water District serves Subareas 1, 2, 3, 4, and 6, as well as a portion of Subareas 5 and 7. A majority of Subarea 5 is outside of the Padre Dam Municipal Water District and SDCWA service boundaries.

2.8.1.3 Water Quality

Groundwater Quality

Historically, groundwater supplies within the County have produced high-quality drinking water. However, naturally occurring and anthropogenic sources of contamination have caused the quality of groundwater to be adversely affected in localized areas. The most common anthropogenic sources of groundwater contamination include leaking underground fuel tanks (LUFTs), sewer and septic systems, agricultural applications, and facilities producing animal wastes (ICF 2017). The most common contaminants in groundwater within the County include elevated nitrate, naturally occurring radionuclides, total dissolved solids (TDS), bacteria, and petroleum products. Other groundwater contaminants of concern, which may occur in localized areas, include herbicides, pesticides and other complex organics, and metals. Within the Alpine CPA, there are groundwater impacts associated with gasoline (i.e., benzene, methyl tertiary butyl ether [MTBE]), nitrate, and naturally occurring radionuclides. Groundwater contaminants are shown on Figures 2.8-4a and 2.8-4b.

Surface Water Quality

The following discussion identifies surface water quality issues facing the two WMAs within which the Alpine CPA is located. Major impacts on the San Diego River WMA include surface water quality degradation, habitat degradation and loss, sediment, invasive species, eutrophication, and flooding. Table 2.8-2 includes the water bodies within the Alpine CPA that are on the Clean Water Act (CWA) 303(d) list. Constituents resulting in water bodies being placed on the CWA 303(d) list include aluminum, bacterial indicators, cadmium, TDS, phosphorus, dissolved oxygen, manganese, nitrogen, and selenium (SWRCB 2019). Factors that may impair water quality in the WMA include urban runoff, agricultural runoff, sewage spills, and other natural sources.

The San Diego Bay WMA, which contains the Sweetwater River Watershed, includes water bodies included on the CWA 303(d) list (see Table 2.8-2). Pollutants of concern include trace metals, other toxic substances, coliform bacteria, pesticides, and nutrients. Sewer overflows, stormwater runoff, and habitat degradation are all factors that may impair water quality within the San Diego Bay WMA. In accordance with CWA Section 303(d), the Alpine CPA and the Watershed Management Areas were compared to the current published List of Impaired Water Bodies, which includes the surface waters that do not meet applicable water quality standards, required pursuant to Section 303(d) of the CWA.

The San Diego Basin Plan lists the San Diego River Watershed beneficial surface uses as municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; and wildlife spawning, reproduction, and/or early development. The San Diego Basin Plan lists the Sweetwater River Watershed beneficial surface uses as municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat, spawning, reproduction, and/or early development; and rare, threatened, or endangered habitat (SWRCB 2016).

Table 2.8-2. Impaired Water Bodies within the Alpine CPA

Watersheds	Water Body Name	303(d) Impairments
Upper San Diego River	El Capitan Reservoir	Not listed
	Alpine Creek	Indicator Bacteria
	Chocolate Creek	Indicator Bacteria, Nitrogen, Phosphorus
	King Creek	Not Listed
Lower San Diego River Watershed	Los Coches Creek	Indicator Bacteria, Nitrogen, Phosphorus, Selenium
	Lower San Diego River	Indicator Bacteria, Low Dissolved Oxygen, Benthic Community Effects, Cadmium, Nitrogen, Phosphorus, TDS, Toxicity
Upper Sweetwater River	Sweetwater River (Upper)	Aluminum, Benthic Community Effects, Indicator Bacteria, Selenium, Total Nitrogen
	Taylor Creek	Not Listed
	Palo Verde Lake	Not Listed
Lower Sweetwater River	Loveland Reservoir	Aluminum
	North Fork Sweetwater River	Indicator Bacteria, Manganese
Pine Valley Creek	Pine Valley Creek	Indicator Bacteria

Source: SWRCB 2019

Unfiltered and untreated stormwater can contain a number of pollutants that may eventually flow to surface waters. The chief cause of urban stormwater pollution is the discharge of inadequately treated waste or pollutants into the natural water system. Discharge may occur naturally or as a result of human activities. Over recent decades, rapid growth and urbanization have placed increased pressure on water resources and resulted in local impacts on water quality, especially in the densely developed western part of the County. In general, increased urbanization increases the amount of pollutants generated by human activities within a watershed and increases the amount of impervious (paved) surfaces, thus reducing the amount of water that would normally infiltrate into the soil and be filtered naturally.

Pollutants, such as fertilizers and pesticides, motor oil, antifreeze, sediment, heavy metals, bacteria, and viruses, that accumulate on impervious surfaces are easily picked up by rainfall runoff and flow downstream via the stormwater conveyance system to surface waters. The stormwater conveyance system is not connected with the sanitary sewer system; therefore, urban runoff is not filtered to remove trash, cleaned, or otherwise treated before it is discharged to surface waters. The typical result is that pollutants are carried directly into surface water by runoff. Surface waters can be polluted by either point sources or non-point sources. A point source is a single, identifiable source of pollution, such as a pipe or drain. Non-point sources of pollution are often termed diffuse pollution and refer to those inputs and impacts that occur over a wide area and are not easily attributed to a single source.

2.8.1.4 Stormwater Drainage Systems

A stormwater conveyance system, as defined by Title 6, Division 7, Chapter 8 of the County of San Diego's Code of Regulatory Ordinances relating to watershed protection, stormwater management, and discharge control (Ordinance 10410 [N.S.] Section 67.802[jj]), means "private and public drainage facilities other than sanitary sewers within the unincorporated County by which urban runoff may be conveyed to receiving waters, and includes, but is not limited to, roads, streets, constructed channels, aqueducts, storm drains, pipes, street gutters, inlets to storm drains or pipes, and catch basins." The stormwater conveyance system is designed to prevent flooding by transporting water away from developed areas. The Alpine CPA

has a range of stormwater drainage facilities, some of which include curb and gutter connected with underground storms drains and roadside ditches.

2.8.1.5 Flooding and Dam Inundation

Flooding is a general or temporary condition of partial or complete inundation of normally dry land areas. Flooding is commonly associated with the overflow of natural rivers or streams, but can also occur near stormwater facilities, dams, or in low-lying areas not designed to carry water. Flooding can be induced by precipitation or as a result of increased rates and amounts of runoff and altered drainage patterns. As shown in Figure 2.8-5a, a portion of Subarea 4 is located within a mapped County floodplain and adjacent to Subarea 2. As shown on Figures 2.8-5b and 2.8-6b, there are no mapped floodplains or floodways in Subarea 7. Federal Emergency Management Agency (FEMA) map floodplains, shown in Figure 2.8-7a and 7b, show a mapped floodplain adjacent to Subarea 2. As shown in Figure 2.8-6a, a portion of Subarea 4 is located within a mapped County floodway.

Flooding could also result from dam failure, seiches, or tsunamis. Dam inundation is flooding caused by the release of impounded water from structural failure or overtopping of a dam. Seiches or tsunamis can result from abrupt movements of large volumes of water due to earthquakes, landslides, volcanic eruptions, meteoric impacts, or onshore slope failure. None of the subareas within the Alpine CPA are within a County Dam Inundation Zone. However, other areas of Alpine CPA are subject to inundation associated with El Capitan Reservoir, Loveland Reservoir, and Palo Verde Lake.

A seiche is a standing wave in a completely or partially enclosed body of water. Areas along the shoreline of a lake or reservoir are susceptible to inundation by a seiche. High winds, seismic activity, or changes in atmospheric pressure are typical causes of seiches. The size of a seiche and the affected inundation area are dependent on different factors including size and depth of the water body; elevation; source; and, if human made, the structural condition of the body of water in which the seiche occurs.

Most enclosed water bodies are reservoirs built by local municipalities and water districts to provide water service to local residents and businesses. Typically, all lands around the reservoirs' shorelines are in public holdings, such as the City of San Diego, which restrict private land development and minimize risk of inundation from seiches. Moreover, the public land holdings are not within the jurisdiction of the unincorporated County. Enclosed bodies of water within the Alpine CPA include El Capitan Reservoir, Loveland Reservoir, and Palo Verde Lake. Loveland Reservoir is not located near the subareas where future development may occur. El Capitan Reservoir, northeast of Subarea 4, is owned by the City of San Diego. Palo Verde Lake is south of Subarea 5 but not within its inundation area.

2.8.2 Regulatory Framework

Section 2.8.2 of the 2011 General Plan EIR and Section 2.7.2 of the FCI EIR included a discussion of regulatory framework related to hydrology and water quality in the unincorporated County, including the Alpine CPA. The regulations described in the prior EIRs are the same as the regulations evaluated in this SEIR, with the exception of the Water Quality Control Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy), Sustainable Groundwater Management Act, State Water Resources Control Board (SWRCB) Construction General Permit, County of San Diego Jurisdictional Runoff Management Plan (JRMP) and the County's Best Management Practices Design Manual (BMP Manual) (County of San Diego 2019), which were not included in the prior EIRs. These more recent regulations are described below. All regulations used from the prior EIRs were reviewed during the drafting of this document to ensure they remain valid and are listed below.

Applicable federal regulations include:

- Clean Water Act (CWA) – Section 303
- National Flood Insurance Act
- National Flood Insurance Reform Act.

Applicable state regulations include:

- Porter-Cologne Water Quality Control Act
- Cobey-Alquist Floodplain Management Act of 1965
- National Pollution Discharge Elimination System (NPDES) Permits
- California Groundwater Rights
- California Water Code
- Assembly Bill 3030 – Groundwater Management Act.

Applicable state regulations not included in the prior EIRs or adopted after adoption of the 2011 General Plan and FCI GPA are described below.

2.8.2.1 Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act, effective January 1, 2015, requires local public agencies in certain groundwater basins throughout the state to sustainably manage groundwater resources, and authorizes State Water Board intervention in areas where local agencies are unable or unwilling to do so. The long-term planning required by the act is designed to provide a buffer against drought and climate change and contribute to reliable water supplies regardless of weather patterns in the state. The Alpine CPA is located outside of a groundwater basin subject to the Sustainable Groundwater Management Act and is therefore not applicable to the Alpine CPU.

2.8.2.2 SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ)

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

Future development projects occurring within the project area would be required to comply with the Construction General Permit if over 1 acre of disturbance would occur during construction.

2.8.2.3 Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems

On June 19, 2012, the SWRCB adopted Resolution No. 2012-0032, the OWTS Policy, which establishes a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements and sets the level of performance and protection expected from OWTS. In accordance with

California Water Code section 13290 et seq., the OWTS Policy sets standards for OWTS that are constructed or replaced, that are subject to a major repair, that pool or discharge waste to the surface of the ground, and that have affected, or will affect, groundwater or surface water to a degree that makes it unfit for drinking water or other uses, or cause a health or other public nuisance condition. The OWTS Policy also includes minimum operating requirements for OWTS that may include siting, construction, and performance requirements; requirements for OWTS near certain waters listed as impaired under Section 303(d) of the CWA; requirements authorizing local agency implementation of the requirements; corrective action requirements; minimum monitoring requirements; exemption criteria; requirements for determining when an existing OWTS is subject to major repair; and a conditional waiver of waste discharge requirements. The SWRCB approved the San Diego Regional Water Quality Control Board's (RWQCB) Nitrate/OWTS Policy Basin Plan amendment on November 17, 2015. The Office of Administrative Law approved the RWQCB's Nitrate/OWTS Policy Basin Plan amendment on May 17, 2016.

Applicable local regulations include:

- San Diego Basin Plan
- Colorado River Basin Plan
- County of San Diego Board of Supervisors (BOS) Policy I-45, Definition of Watercourses in the Subject of Flood Control
- County of San Diego BOS Policy I-68, Proposed Projects in Floodplains with Defined Floodways
- County of San Diego BOS Policy I-73, Hillside Development Policy
- County of San Diego Code of Regulatory Ordinances Section 91.1.105.10, Flood Damage Prevention Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608, Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 67.801-67.814, Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO) (For the convenience of the reader, a full description for this ordinance is provided below as it is referenced in the impact analysis section)
- County of San Diego Code of Regulatory Ordinances Sections 67.701-67.703, 67.710-67.711, 67.720-67.722, Groundwater Ordinance.

Applicable local regulations not included or adopted after adoption of the 2011 General Plan and FCI GPA are described below.

2.8.2.4 County of San Diego Jurisdictional Runoff Management Plan

The County's JRMP, approved on July 26, 2015, was prepared in response to regulatory requirements adopted by the RWQCB. The purpose of the JRMP document is to guide implementation of programs and strategies to reduce pollutants discharged from the County's storm drain system to receiving waters.

The goal of the JRMP is to establish a programmatic framework for the implementation of stormwater management activities in accordance with Water Quality Improvement Plan strategies and other jurisdictional plans, design standards, and ordinances. By providing and implementing programs for new

land development and redevelopment projects, impacts on receiving waters and other environmental resources are minimized. The JRMP also complies with federal and state laws.

2.8.2.5 County of San Diego BMP Design Manual

Updated in January 2019, the County's BMP Manual guides land development and public improvement projects in the unincorporated area to reach compliance with the Regional Municipal Separate Storm Sewer System (MS4) Permit and reduce the discharge of pollutants in stormwater to the maximum extent practicable. It is focused on project design requirements and related post-construction requirements and provides guidance on which stormwater management requirements apply to a given project; defines the performance standards for source control and site design BMPs, stormwater pollution control BMPs, and hydromodification management BMPs based on the Regional MS4 Permit; outlines the required steps to the comprehensive stormwater management design process; contains the source control and site design requirements applicable to all development; outlines the process of determining which category of on-site pollution control BMP or combination of BMPs is most appropriate for a given project and how those BMPs should be designed; provides guidance for meeting the performance standards for the two components of hydromodification management: protection of critical coarse sediment yield areas and flow control for post-project runoff; and describes the long-term maintenance requirements for structural BMPs.

The BMP Manual established the minimum BMP requirements applicable to all development projects, regardless of size or type. These measures include general BMP siting, source control BMPs, and site design BMPs. The County's 2013 MS4 Permit requires copermittees to impose additional requirements on those projects considered Priority Development Projects (PDPs), which are required to comply with structural BMP performance requirements specified in the BMP Manual. These additional requirements focus on retention of the 85th percentile storm event. If on-site retention is not feasible, other alternatives are available, including partial retention and biofiltration. PDPs are also required to comply with hydromodification management BMP requirements, as specified in the BMP Manual, which address flow duration impacts and critical sediment yield areas. All projects must meet the following general requirements:

- On-site BMPs must be located so as to remove pollutants from runoff prior to its discharge to any receiving waters, and as close to the source as possible;
- Structural BMPs must not be constructed within waters of the US; and
- On-site BMPs must be designed and implemented with measures to avoid the creation of nuisance or pollution associated with vectors (e.g., mosquitos, rodents, or flies).

All projects must complete a Storm Water Intake Form to determine if they are a development project and to assess their priority and project type. The Storm Water Intake Form determines which type of Stormwater Quality Management Plan (SWQMP) Form is required for each development project.

The MS4 Permit establishes separate performance standards for (1) source control and site design practices, (2) stormwater pollutant control BMPs, and (3) hydromodification management BMPs. Each development project must be designed to satisfy any of several potentially applicable performance standards. Performance standards are specific design objectives to be achieved through the implementation of BMPs.

Baseline Source Control and Site Design BMPs must be implemented for all development projects wherever it is applicable and feasible to do so. These BMPs help to prevent the on-site generation of

pollutants and flows and to keep them from leaving the site. The following source control BMPs must be implemented at all development projects where applicable and feasible:

- Prevention of illicit discharges into the MS4
- Storm drain system stenciling or signage
- Protection of outdoor material storage areas from rainfall, run-on, runoff, and wind dispersal;
- Protection of materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal
- Protection of trash storage areas from rainfall, run-on, runoff, and wind dispersal
- Use of any additional BMPs determined to be necessary by the County of San Diego to minimize pollutant generation at each project.

The following site design practices must be implemented at all Development Projects, where applicable and feasible:

- Maintenance or restoration of natural storage reservoirs and drainage corridors (including topographic depressions, areas of permeable soils, natural swales, and ephemeral and intermittent streams)
- Buffer zones for natural water bodies (where buffer zones are technically infeasible, require project applicant to include other buffers such as trees, access restrictions, etc.)
- Conservation of natural areas within the project footprint, including existing trees, other vegetation, and soils
- Construction of streets, sidewalks, or parking lot aisles to the minimum widths necessary, provided public safety is not compromised
- Minimization of the impervious footprint of the project
- Minimization of soil compaction to landscaped areas
- Disconnection of impervious surfaces through distributed pervious areas
- Landscaped or other pervious areas designed and constructed to effectively receive and infiltrate, retain, and/or treat runoff from impervious areas, prior to discharging to the MS4
- Small collection strategies located at, or as close as possible to, the source (i.e., the point where stormwater initially meets the ground) to minimize the transport of runoff and pollutants to the MS4 and receiving waters
- Use of permeable materials for projects with low traffic areas and appropriate soil conditions;
- Landscaping with native or drought tolerant species
- Harvesting and using precipitation.

An Enhanced Site Design BMP is any site design BMP used specifically to reduce the Design Capture Volume (DCV) within a Drainage Management Area (DMA). This can be achieved either by adjusting the impervious runoff factor of one or more surfaces or by implementing BMPs that receive and mitigate a portion of the DCV. Because DCV reduction is not required, this performance standard is optional.

However, implementation of Enhanced Site Design BMPs is strongly encouraged for all PDPs as a means of reducing or eliminating the need for other, more complex or costly BMPs needed to satisfy Structural Performance Standards for the remaining DCV.

Structural Performance Standards are numeric design standards for reducing or eliminating stormwater flows and pollutant loads from PDP sites. They specifically address the remaining volume of runoff within a DMA (either the DCV or a greater volume) after the application of all other site design and source control BMPs described above. Storm Water Pollutant Control BMPs for PDPs must meet the following performance standards:

1. Each PDP shall implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event (DCV).

    a. If it is not technically feasible to implement retention BMPs for the full DCV on site for a PDP, then the PDP shall utilize biofiltration BMPs for the remaining volume not reliably retained. Biofiltration BMPs must be designed as described in Appendix F of the BMP Manual to have an appropriate hydraulic loading rate to maximize stormwater retention and pollutant removal, as well as to prevent erosion, scour, and channeling within the BMP, and must be sized to:

        i. Treat 1.5 times the DCV not reliably retained on site, or

        ii. Treat the DCV not reliably retained on site with a flow-thru design that has a total volume, including pore spaces and pre-filter detention volume, sized to hold at least 0.75 times the portion of the DCV not reliably retained on site.

    b. If biofiltration BMPs are not technically feasible, then the PDP shall utilize flow-thru treatment control BMPs (selected and designed per Appendix J.5 of the BMP Manual) to treat runoff leaving the site, and participate in offsite alternative compliance to mitigate for the pollutants from the DCV not reliably retained onsite pursuant to Section 2.2.1.(b). Flow-thru treatment control BMPs must be sized and designed to:

        i. Remove pollutants from storm water to the MEP [Maximum Extent Practicable] (defined by the MS4 Permit) by following the guidance in Appendix J.5 of the BMP Manual; and filter or treat either: 1) the maximum flow rate of runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event, or 2) the maximum flow rate of runoff produced by the 85th percentile hourly rainfall intensity (for each hour of a storm event), as determined from the local historical rainfall record, multiplied by a factor of two (both methods may be adjusted for the portion of the DCV retained on site as described in Appendix J.5 of the BMP Manual), and

        ii. Meet the flow-thru treatment control BMP treatment performance standard described in Appendix J.5 of the BMP Manual.

2. A PDP may be allowed to participate in an offsite alternative compliance program in lieu of fully complying with the performance standards for storm water pollutant control BMPs on site.

For many PDP sites, additional BMPs may be needed to preserve the supply of critical coarse sediment to water bodies. Any PDP that is not exempt from hydromodification management requirements must either comply with critical coarse sediment requirements or demonstrate that they do not apply.

2.8.2.6 County of San Diego Low Impact Development Handbook

The County's Low Impact Development Handbook—Stormwater Management Strategies (County DPW 2014) was created in 2007 and updated in July 2014 by a multidisciplinary Technical Advisory Committee. The goal of the County Low Impact Development (LID) Program is to protect water quality by preserving and mimicking natural hydrologic functions through the use of stormwater planning and management techniques on a project site. The purpose of the LID Handbook is to provide a comprehensive list of LID planning and stormwater management techniques for developers, builders, contractors, planners, landscape architects, engineers, and government employees as guidance to reference before developing a project site. The document serves as a guidance document for the planning, application, design, and maintenance of LID BMPs. LID feasibility and applicability criteria and specific LID requirements are specified in the BMP Manual.

2.8.2.7 County of San Diego Code of Regulatory Ordinances Sections 67.801–67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO)

The current WPO was adopted in March 2008 and amended in January 2016. The stated purposes of this ordinance are to protect the health, safety, and general welfare of County residents; to protect water resources and improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the State; to secure benefits from the use of stormwater as a resource; and to ensure the County of San Diego is compliant with applicable state and federal law. The WPO contains discharge prohibitions and requirements that vary depending on type of land use activity and location in the County. The WPO defines the requirements legally enforceable by the County in its unincorporated areas.

In accordance with the WPO, the County requires the development of a SWQMP to be submitted with discretionary and ministerial permit applications. The purpose of the SWQMP is to mitigate stormwater impacts by identifying effective permanent BMPs for implementation. The SWQMP review process takes into account the project location, receiving water quality, anticipated project impacts and associated pollutants, and mitigation for impacts with the selection of BMPs. The SWQMP provides needed information to address both stormwater and non-stormwater issues. The Preliminary Grading Plan and Preliminary Hydrology/Drainage Study are an integral part of the SWQMP and provide the technical basis for the SWQMP. The SWQMP requires, but is not limited to, the following elements:

- Water quality pollutants of concern, treatment volume based on water quality design storm, site plans and adjacent land use, and soil characteristics;
- Mitigation measures to protect water quality, pollution prevention BMPs (MEP Based), site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs;
- Mitigation measures to prevent increases in downstream erosion to MEP, site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs;
- Any infiltration BMPs proposed for use on site; and
- Agreements, easements, licenses relating to proposed BMP construction, location, maintenance, or changes in drainage character.

As defined in the WPO, each proposed project is required to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the maximum extent practicable, (2) receiving water quality objectives are not violated throughout the life of the project, and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat.

The WPO also contains LID requirements. LID is a stormwater management approach that maintains the natural hydrologic character of a site or region by using design techniques that infiltrate, filter, store, evaporate, and detain runoff on site. A LID Handbook was developed in December 2007 by the County of San Diego Department of Public Works (DPW) to provide the development community with guidance on implementing LID strategies and practices (County of San Diego DPW 2014). The WPO has incorporated LID site design BMP requirements in Section 67.806, *General Best Management Practice Requirements*, to be applicable to all development projects with the potential to add pollutants to stormwater or to affect the flow rate or velocity of stormwater runoff. This requirement defines the general standard for LID site design. The more explicit LID site design requirements for PDPs have been included in Section 67.810/67.811, *Additional Planning, Design and Post-Construction Requirements for Development Projects*. The BMP Manual includes a discussion of LID Site Design requirements.

All construction sites determined to be a land disturbance activity, as defined in the WPO, are required to meet *General BMP Requirements* (Attachment 2.2 of Section 67.806) and the *Additional BMP Requirements for Construction Projects* (Section 67.809). Section 67.806 (Attachment 2.2) of the WPO includes the list of general BMP requirements applicable to all dischargers. Section 67.809 (Attachment 2.2) of the WPO includes the list of additional BMPs to be implemented and maintained for construction projects. At a minimum, the County has determined that the following pollution control practices be adequately implemented and maintained year-round on all non-exempt projects:

- Project Planning
- Good Site Management "Housekeeping," including waste management
- Non-stormwater Management
- Erosion Control
- Sediment Control
- Run-on and Run-off Control
- Active/Passive Sediment Treatment Systems, where applicable
- Any other construction BMPs suggested by the applicable Water Quality Improvement Plan and deemed to be effective at controlling erosion and sedimentation.

Disturbed soil areas are considered active whenever soil-disturbing activities have occurred, continue to occur, or will occur during the ensuing 14 days. Non-active areas must be protected within 14 days of cessation of soil-disturbing activities or prior to the onset of precipitation, whichever occurs first.

2.8.2.8 County of San Diego GPU Policies

There are specific General Plan policies and goals found in the Safety Element, Conservation and Open Space Element, and Land Use Element intended to address hydrology and water quality. These policies are summarized below and included in Appendix C for reference.

Safety Element

Goal S-8 is to reduce landslide, mudslide, and rock fall hazards. This is accomplished by policies S-8.1 and S-8.2 by directing development away from areas with high potential for these hazards. Goal S-9 is for the protection of life and property from flood events, and this is accomplished by policies S-9.1 through S-9.6 by managing and limiting development in floodplains and prohibiting development in some floodplain fringe areas and dam inundation areas. Goal S-10 is in regard to floodways and floodplain capacities and is accomplished by policies S-10.1 through S-10.6, which limit new or expanded uses in floodways; require, with exceptions, the use of natural channels for County flood control facilities; and provide guidance for flood control facilities and stormwater management and drainage facilities.

Conservation and Open Space Element

Goal COS-4 is a water management goal for a balanced and regionally integrated water management approach and is accomplished by policies COS-4.1 through COS-4.4, which require development to reduce the waste of potable water, require efficient irrigation systems, maximize stormwater filtration and/or infiltration, and require appropriate measures to protect water supply sources in areas with a high potential for contamination.

Goal COS-5 is for the protection and maintenance of water resources, including local reservoirs, watersheds, aquifer recharge areas, and natural drainage systems to maintain high-quality water resources. This is accomplished by policies COS-5.1 through COS-5.5, which require restricted development in floodplains and floodways, and minimization of impervious surfaces, which would impair groundwater recharge and contribute to stormwater runoff and heat retention. In addition, the goal is accomplished through downslope protection, removal of invasive species to restore natural drainage systems, and requiring development to avoid impacts to water quality in local water sources.

Land Use Element

Goal LU-6 is for a development and environmental balance, and is accomplished through policies LU-6.5, LU-6.9, LU-6.10, and LU-6.12, which require sustainable stormwater management, development in conformance with the natural topography, requirements to locate development to protect residents and property from natural and manmade hazards, and documentation and annual reviews of areas within 100-and 200-year floodplains to ensure areas subject to flooding are accurately mapped.

Goal LU-8 is conservation for aquifers and groundwater, and is accomplished through policies LU-8.1 and LU-8.2, which require land use densities in groundwater-dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley, and require development to identify adequate groundwater resources in groundwater-dependent areas, as follows:

- In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley.
- In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.

Goal LU-13 is an adequate water quality, supply, and protection, and is accomplished by policies LU-13.1 and LU-13.2, which coordinate water infrastructure planning with land use planning to maintain a high

quality and sustainable water supply and require new development to identify adequate water resources prior to approvals.

Goal LU-14 addresses adequate wastewater disposal and is accomplished by policies LU-14.2 through LU-14.4, which require that development provide for the adequate disposal of wastewater concurrent with the development, require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency, and prohibit sewer facilities that would induce unplanned growth. These policies are further described in the General Plan.

2.8.2.9 Alpine CPU Policies

There are Alpine CPU goals found in the Land Use Element and Conservation and Open Space Element intended to protect hydrology and water quality. These goals are summarized below.

Land Use Element

Goal LU-6 is to encourage a balance of land uses, which will conserve natural and man-made resources and will accommodate people of diverse lifestyles, occupations, and interests.

Conservation and Open Space Element

Goal COS-1 is to promote the well-planned management of all valuable resources, natural and man made, and prevent the destruction and wasteful exploitation of natural resources, where feasible.

2.8.3 Analysis of Project Effects and Determination as to Significance

Based Appendix G of the State CEQA Guidelines, County of San Diego Guidelines for Determining Significance – Hydrology (County of San Diego 2007a), County of San Diego Guidelines for Determining Significance – Surface Water Quality (County of San Diego 2007b), and the County of San Diego Guidelines for Determining Significance – Groundwater Resources (County of San Diego 2007c) the proposed project would result in a significant impact if it would:

- Violate any waste discharge requirements, otherwise degrade water quality or violate any water quality standards or waste discharge requirements.
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site.
- Substantially alter the existing drainage pattern of the site or area, including alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map.

- Place structures within a 100-year flood hazard area which would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

2.8.3.1 Issue 1: Violate any waste discharge requirements, otherwise degrade water quality or violate any water quality standards or waste discharge requirements.

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would violate any water quality standards, otherwise degrade water quality, or violate any water quality standards or waste discharge requirements.

Impact Analysis

The prior EIRs determined that future development would have the potential to result in impacts related to violating water quality standards or otherwise degrading water quality and would have the potential to result in a cumulative impact associated with water quality standards. In addition, the prior EIRs, determined that future development would result in potentially significant impacts to water quality from proposed land uses in groundwater-dependent areas that are currently experiencing groundwater contamination. The discussion of impacts associated with water quality standards from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. While implementation of mitigation measures and General Plan policies would reduce impacts, the prior EIRs determined that future development in areas currently experiencing groundwater contamination would exacerbate water quality impacts. Therefore, impacts associated with groundwater quality would not be mitigated to below a level of significance and were determined to be significant and unavoidable. The mitigation measures identified in the prior EIRs were based on implementation of the identified regulatory requirements. In the analyses below, the proposed project assumes implementation of these regulatory requirements prior to significance determination.

Future development within the Alpine CPA associated with implementation of the proposed project would have the potential to contribute to a violation of water quality standards or degradation of surface water or groundwater quality, as the proposed land use changes would result in an increase in intensity, density, and the number of potential dwelling units that could be developed at buildout of the community plan. The discussion of impacts for these issues is organized into the following subsections: (1) Construction Impacts and (2) Operational Impacts.

Surface Water Quality

Construction Impacts

The increased development densities in three of the subareas (Subareas 2, 4, and 6) would have the potential to result in additional sources of polluted runoff that would have short-term impacts on surface water quality through activities such as demolition, clearing and grading, excavation of undocumented fill materials, stockpiling of soils and materials, concrete pouring, painting, and asphalt surfacing. Typically, construction activities involve various types of equipment such as dozers, scrapers, graders, loaders,

compactors, dump trucks, cranes, water trucks, and concrete mixers. Additionally, soils are typically stockpiled outdoors and used later during construction. Pollutants associated with these construction activities include soils, debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials.

Pollutants associated with construction would degrade water quality if they are carried by stormwater or other runoff into surface waters. Table 2.8-2 identifies watersheds within the Alpine CPA that contain impaired water bodies as defined by the CWA 303(d) list. Sediment is often the most common pollutant associated with construction sites because of the associated earth-moving activities and areas of exposed soil. Sediment that is washed off site can result in turbidity in surface waters, which can impact aquatic species. In addition, when sediment is deposited into receiving water, it can smother species, alter the substrate and habitat, and alter the drainage course. Hydrocarbons such as fuels, asphalt materials, oils, and hazardous materials such as paints and concrete slurries discharged from construction sites could also impact aquatic plants and animals downstream. Debris and trash could be washed into existing storm drainage channels to downstream surface waters and could impact wildlife as well as aesthetic quality.

Federal, State, and Local Regulations and Existing Regulatory Processes

All discretionary projects, including grading permits, are subject to review by the County for impacts on water quality. Under the NPDES Construction General Permit program, SWPPPs must be prepared, and the BMPs identified in the SWPPPs must be implemented for construction sites greater than 1 acre, in order to reduce the occurrence of pollutants in surface water. The NPDES Permit is updated periodically and new development would be required to comply with the updated regulations. In compliance with the applicable Construction General Permit, the future development would be required to implement BMPs that minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. While these measures help prevent degradation of water quality associated with construction sites greater than 1 acre, smaller construction activities would still have the potential to contribute pollutants such as soils, debris, and other materials in quantities that would exceed water quality standards and otherwise significantly degrade water quality.

Future development projects allowed under the proposed project would be required under the MS4 NPDES permit program to include minimum BMPs, such as silt fencing, desilting basins, sediment traps and check dams, street sweeping, stormdrain inlet protection, sandbag barriers, straw bale barriers, gravel bag berms, and fiber rolls to reduce the discharge of pollutants associated with the small construction sites. For projects that are under 1 acre, the construction requirements identified in the County's WPO would be required to be implemented during construction. Section 67.806 of the WPO includes the list of general BMP requirements applicable to all dischargers. Section 67.809 (Attachment 2.2) of the WPO includes the list of additional BMPs to be implemented and maintained for all construction projects.

Summary

The proposed project would allow for a greater number of housing units within Subareas 2, 4, and 6 of the Alpine CPA. There would be a reduction of housing units in Subarea 5, and no change in Subareas 1, 3, and 7. This would result in additional construction activities compared to the development allowed under the current General Plan (Impact-HYD-1) and may cause a greater level of disturbance and increased impervious surfaces. Although there are increased development densities in three subareas, reasonably foreseeable construction of future development is not likely to cause a more severe impact related to surface water quality standards and requirements compared with that identified in the prior EIRs. The

proposed project would be required to adhere to all regulations and requirements, and impacts would be greater than those impacts identified in the prior EIRs. With implementation of the prior EIRs mitigation measures Hyd-1.1 through Hyd-1-5, impacts associated with construction would be **less than significant**.

Operational Impacts

The proposed project would generate pollutants associated with the new land uses. The increased development densities allowed under the proposed project within three of the subareas of the Alpine CPA would allow more housing units, which would have the potential to generate additional pollutants, if developed and operational. Multiple constituents associated with residential land use operations have the potential to degrade surface water quality following construction, including sediment discharge due to post-construction areas being left bare and eroded by stormwater discharges; nutrients from fertilizers; household hazardous waste that is improperly disposed of, including heavy metals and organic compounds; trash and debris deposited in drain inlets by new residents; oil and grease; byproducts resulting from vehicle use, including heavy metals; bacteria and viruses; and pesticides from landscaping, agriculture, or home use. Generally, these can be referred to as non-point source pollutants. Thus, increased runoff from future development would contribute to non-point source pollution in surface and groundwater bodies.

As stated above, within the Alpine CPA, eight water bodies are in violation of water quality standards. Table 2.8-2 identifies watersheds within the Alpine CPA that contain impaired water bodies as defined by the CWA 303(d) list and shows the major pollutant/stressor for each impaired water body. Implementation of the proposed project would result in increased residential development densities that, if developed, would add pollutants to surface water bodies that could potentially violate water quality standards. The increased residential land use densities under the proposed project could increase urban runoff containing oil, grease, metals, pathogens, TDS, sediments, or toxic chemicals. WMAs that would be impacted by the proposed project include the San Diego River WMA and the San Diego Bay WMA (including Sweetwater HU). Both of these WMAs have water bodies listed on the impaired water body list, as defined by the CWA 303(d) list (see Table 2.8-2). The proposed project could potentially result in increased development densities that could contribute additional point and non-point source pollutants within WMAs in violation of water quality requirements.

Federal, State, and Local Regulations and Existing Regulatory Processes

Federal, state, and local regulations exist that reduce the potential for projects to violate water quality standards. As identified in the Regulatory Setting, above, the County's JRMP, BMP Manual, LID Handbook, and WPO require each proposed project to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the maximum extent practicable; (2) receiving water quality objectives are not violated throughout the life of the project; and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat. These regulatory requirements were also identified in the prior EIRs as mitigation measures Hyd-1.2 through Hyd-1.5.

In accordance with the WPO and BMP Manual, the County requires the development of an SWQMP to be submitted with discretionary and ministerial permit applications. The purpose of the SWQMP is to mitigate stormwater impacts by identifying effective LID features and permanent BMPs for implementation. The SWQMP review process considers the project location, receiving water quality, anticipated project impacts and associated pollutants, and mitigation for impacts with the selection of BMPs. The SWQMP provides needed information to address both stormwater and non-stormwater issues. The SWQMP is prepared for essentially all actions associated with increases to impervious surfaces.

Larger projects receive more in-depth analysis and have more stringent requirements pursuant to the WPO and BMP Manual.

Summary

Because the proposed project would allow for a greater number of housing units resulting in the potential for additional point and non-point source pollutants compared to the current General Plan, operational impacts on surface water quality would be more severe. Therefore, due to the increased development densities proposed in the Alpine CPA, operation of the proposed project would cause a more severe impact than identified in the prior EIRs (Impact-HYD-2). However, because future development allowed by the Alpine CPU would also be required to comply with the County's JRMP, BMP Manual, LID Handbook, and WPO, and permanent BMPs (i.e., source control, site design, and structural) would be implemented to reduce the discharge of pollutants to the maximum extent practicable, the impact would be reduced to **less than significant** compared to those impacts identified in the prior EIRs.

Groundwater Quality

Construction Impacts

The increased development densities allowed under the proposed project would allow more housing units than the current General Plan, which could result in excavation of soils in depths that result in groundwater dewatering activities. Should these occur in areas of groundwater contamination, the dewatering activities could result in water quality degradation if discharged to surface water, as the surface water eventually recharges the groundwater aquifer.

During construction, hazardous materials (e.g., fuels, paints, solvents, concrete additives, etc.) could be used and therefore would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater.

Federal, State, and Local Regulations and Existing Regulatory Processes

Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would effectively reduce the potential for the construction of the proposed project to release contaminants into groundwater that could expand the area or increase the level of groundwater contamination or cause the violation of regulatory water quality standards. Additionally, pumped groundwater must be tested to determine if it is contaminated, and the water must be collected and disposed of in accordance with the San Diego RWQCB's General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters Permit (Order NO. R9-2015-0013).

Summary

Because the proposed project has the potential to expand the area of construction, the proposed project has the potential to increase the level of groundwater contamination or increase the potential for the violation of regulatory water quality standards compared to the development allowed under the current General Plan (Impact-HYD-3). Future development associated with the proposed project would be required to comply with all federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, and the impact would be reduced similar to those impacts identified in the prior EIRs with mitigation measures identified in Sections 2.7.4 and 2.8.6. Therefore, the proposed project would result in **less than significant** impacts on groundwater quality during construction.

Operational Impacts

The proposed project would allow for construction in groundwater-dependent areas that are currently experiencing groundwater contamination, and the increased development densities allowed under the proposed project would allow more housing units, which could exacerbate groundwater contamination. As described in Section 2.8.1, the Padre Dam Municipal Water District serves Subareas 1, 2, 3, 4, 6, and 7, as well as a portion of Subarea 5. A majority of Subarea 5 is outside of the Padre Dam Municipal Water District and SDCWA service boundaries. Within the Alpine CPU area, the majority of Subarea 5 is entirely groundwater-dependent; however, under the proposed project, Subarea 5 land use changes would result in a slight decrease of dwelling units, and therefore would not impact groundwater services.

Groundwater impacts associated with gasoline, which include benzene and MTBE, have been identified within Subareas 2 and 6. New wells constructed to support development in these areas would be potentially susceptible to inducing the flow of contaminated groundwater, which could result in the spread of the groundwater contamination plumes. This would be considered a potentially significant impact associated with groundwater quality because it could exacerbate the existing condition.

In addition, the proposed land uses could result in the construction of septic tanks. The use of septic tanks has the potential to result in groundwater contamination should septic tanks not be properly sited, maintained, or constructed. The San Diego Basin Plan incorporated the SWRCB OWTS Policy and identifies the criteria to be used to regulate OWTS in the San Diego Region. The purpose of the OWTS Policy is to allow for the continued use of OWTS, including septic tanks, while protecting water quality and public health. Therefore, assuming compliance with the Basin Plan regarding implementation of septic tanks, impacts on groundwater quality due to construction of septic tanks would be less than significant.

Federal, State, and Local Regulations and Existing Regulatory Processes

Groundwater-dependent areas with existing groundwater contamination would not be able to support new development due to the non-potable (contaminated) water supply in the area, which would not comply with the Safe Drinking Water Act. Groundwater with contaminants that exceed the federal and state primary maximum contaminant levels (MCLs) is not considered potable. Therefore, any land uses or construction of development allowable under the proposed project and dependent on groundwater for potable uses with existing contamination would not have a viable source of water.

The Alpine CPA experiences groundwater quality issues associated with Leaking Underground Fuel Tank (LUFT) sites, nitrates, and radiochemicals. Projects proposing the use of groundwater must demonstrate a viable water supply that meets state standards associated with the Safe Drinking Water Act. Samples must be analyzed for radionuclides, nitrates, and other contaminants depending on location. If applicable standards cannot be met, alternative sources or treatment is required. Groundwater-dependent land uses proposed in the areas identified as having potential water quality impacts would potentially depend on a groundwater supply that contains water quality constituents at concentrations above primary federal or state MCLs, thus not currently meeting water quality standards. Areas adjacent to Subareas 3 and 5, and north of Subarea 6 contain groundwater with nitrate levels that currently exceed water quality standards and therefore limit the availability of potable groundwater.

Summary

The proposed project would allow for the construction of new wells in areas with contaminated groundwater that do not meet the Safe Drinking Water Act standards. In addition, the activities associated with the various land use changes associated with the proposed project have the potential to impact

surface water quality, which would in turn impact groundwater. This would potentially result in the spread of contaminated groundwater compared to the prior EIRs. Future development associated with the proposed project would be required to comply with all federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste. While this would reduce the proposed project impact, the increased development densities proposed have the potential to cause a more severe potentially significant impact related to groundwater quality standards and requirements compared to that identified in the prior EIRs. This would be considered a **significant impact (Impact-HYD-4).**

2.8.3.2 Issue 2: Deplete Groundwater Supplies and Interfere with Recharge

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table level would occur (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).

Impact Analysis

The prior EIRs determined future development would have the potential to affect groundwater supplies and recharge and would have the potential to result in a cumulative impact associated with groundwater resources. The discussion of impacts associated with groundwater supplies and recharge from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Implementation of mitigation measures and General Plan policies would reduce impacts. However, impacts associated with groundwater supplies and recharge would not be mitigated to below a level of significance because implementation of the 2011 General Plan and FCI GPA would allow land uses and development to occur in areas currently experiencing groundwater supply and recharge impacts, thereby worsening an already unsustainable groundwater supply. Therefore, impacts on groundwater supplies and recharge would be significant and unavoidable.

Within the proposed project area, the Padre Dam Municipal Water District serves Subareas 1, 2, 3, 4, 6, and 7, as well as a portion of Subarea 5. A majority of Subarea 5 is outside of the Padre Dam Municipal Water District and SDCWA service boundaries and is groundwater dependent. The proposed decrease in density in Subarea 5 would result in a reduction of 31 dwelling units and therefore would not substantially change dependency on groundwater.

Future development in Subareas 2, 4, and 6 could interfere with groundwater recharge by increasing impervious surfaces associated with new residential and commercial buildings, roadways, parking lots, and sidewalks; however, the increase in units is not significantly greater than under the current General Plan.

Federal, State, and Local Regulations and Existing Regulatory Processes

The County currently manages anticipated future groundwater demand through the County Groundwater Ordinance (Ordinance #9826, N.S.) and during project-specific CEQA review of discretionary permits. The Groundwater Ordinance does not limit the number of wells or the amount of groundwater extraction by existing landowners but does have specific measures to mitigate potential groundwater impacts of projects requiring specified discretionary permits. In addition, the Ordinance includes residential density

controls that identify minimum parcel sizes for single-family residential development in groundwater-dependent areas. Future development associated with the Alpine CPU in groundwater-dependent areas would be subject to these regulatory requirements.

The 2011 General Plan includes several policies within the Conservation and Open Space Element and the Land Use Element that would reduce the potential for the Alpine CPU to substantially deplete groundwater supplies or interfere substantially with groundwater recharge. These policies are summarized in Section 2.8.2.8, above.

Summary

The development potential associated with the proposed project would be greater than what was anticipated in the 2011 General Plan, and the potential amount of impervious surfaces that could interfere with groundwater recharge could also be increased. An increase in housing units is only proposed in Subareas 2, 4, and 6, and a decrease of units is proposed in Subarea 5. The proposed project would comply with all policies and regulations related to groundwater supply and recharge. Even though the proposed project only proposes a slight increase in housing units compared to the current General Plan, there is still potential for a more severe impact related to depleting groundwater supplies and interfering with recharge compared to that identified in the prior EIRs (Impact-HYD-5). This would be considered a **significant impact**.

2.8.3.3 Issue 3: Result in Erosion or Siltation

Guidelines for the Determination of Significance Analysis

The Alpine CPU would have a significant impact if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.

Impact Analysis

The prior EIRs determined that future development would have the potential to alter the existing drainage patterns of a site or area, which could result in substantial erosion or siltation on or off site, and would have the potential to result in a cumulative impact related to erosion or siltation. The discussion of impacts associated with erosion or siltation from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies, because policies and mitigation would require compliance with the JRMP; LID standards; Grading, Clearing and Watercourses Ordinance; RPO; and development requirements that maximize natural drainage and topography when conveying stormwater.

For this issue, the discussion of impacts is organized into the following subsections: (1) Construction Impacts and (2) Operational Impacts.

Construction Impacts

Future development allowed under the proposed project would result in land-disturbing activities from the construction of residential and commercial structures, and infrastructure needed to support future development. The proposed increased development densities would result in more residential development than the current General Plan. These activities would alter drainage patterns in a manner that could result in substantial erosion or siltation on or off site. Land-disturbing construction activities,

such as the grading and excavation of land for construction of new building foundations, roads, driveways, and trenches for utilities, have the potential to result in localized temporary or permanent alteration of drainage patterns, or *hydromodification*. Hydromodification refers to changes in the magnitude and frequency of stream flows because of urbanization and the resulting impacts on the receiving channels in terms of erosion, sedimentation, and degradation of in-stream habitat. This can lead to indirect effects on communities and sensitive biological resources downstream in the watershed, including the deposition of pollutants and sediment to the watershed outlets, an increase in polluted runoff to surface and groundwater receiving bodies, and an increase in the flood potential downstream.

Federal, State, and Local Regulations and Existing Regulatory Processes

As described under surface water quality, future construction activities within the Alpine CPA would be required to comply with the NPDES permit program, which requires a SWPPP to be prepared and BMPs to be implemented for construction sites greater than 1 acre. Additionally, all land disturbance activities occurring within the Alpine CPA would be subject to the discharge prohibitions and additional requirements stated in the County WPO. Adherence to existing regulations would limit erosion by minimizing site disturbance to the maximum extent practicable and installing erosion control BMPs to prevent off-site sediment discharges; as such, impacts would be less than significant.

In addition, the prior EIRs identified several mitigation measures in Sections 2.7.4 and 2.8.6 addressing impacts related to erosion that would be applicable to the proposed project, including Hyd-1.2 through Hyd-1.5 and Hyd-3.1 through Hyd-3.3. Implementation of the same General Plan policies and prior EIRs mitigation measures and compliance with existing regulations would further reduce the proposed project's less than significant impacts related to erosion because these measures require the establishment and enforcement of standards and regulations to reduce adverse effects of polluted runoff.

Summary

While the proposed project would allow for an increase of housing units in Subareas 2, 4, and 6, there would no change in units in Subareas 1, 3, and 7, and a decrease of units would occur in Subarea 5. The proposed project would result in additional construction activities compared to the current General Plan (Impact-HYD-6) in Subareas 2, 4, and 6; however, these impacts would be minimized with compliance with the Construction General Permit and County WPO requirements for all construction sites. Therefore, while impacts may occur, the overall impacts would be similar in nature to those identified in the prior EIRs, and construction impacts related to erosion and siltation would be **less than significant.**

Operational Impacts

Development of land uses designated in the proposed project would result in the construction of residential structures and other features within the Alpine CPA that are anticipated to result in permanent alterations to existing drainage patterns by increasing density and converting areas from pervious surfaces to impervious surfaces. Allowing the permanent development of impervious surfaces within the Alpine CPA could increase runoff and potentially result in new erosion problems or the worsening of existing erosion problems. Development of land uses designated in the Alpine CPU could result in alterations to existing drainage patterns in a manner that could result in substantial erosion or siltation on or off site.

Federal, State, and Local Regulations and Existing Regulatory Processes

There are a number of federal, state, and local regulations in place to reduce on- and off-site erosion with which the Alpine CPU is required to comply. The MS4 permit requires certain PDPs to comply with

hydromodification management requirements, as specified in the County's BMP Manual, which address flow duration impacts and critical sediment yield areas, as well as on-site BMPs to manage hydromodification that may be caused by stormwater runoff discharged from a project. Hydromodification management BMPs manage increases in runoff discharge rates and durations from specific projects, where such increased rates and durations are likely to cause increased erosion of channel beds and banks, sediment pollutant generation, or other adverse impacts on beneficial uses and stream habitat due to increased erosive force. The purpose of hydromodification management requirements for PDPs is to minimize the potential of stormwater discharges from the MS4 from causing altered flow regimes and excessive downstream erosion in receiving waters. PDPs subject to hydromodification management requirements must provide flow control for post-project runoff to meet the flow control performance standard. Additional existing regulations include the NPDES, which regulates pollutant discharges to surface waters of the US; the County Grading, Clearing and Watercourses Ordinance, which requires work to be conducted in such a manner as to protect against both short-term and long-term erosion and instability; WPO, which protects water resources and improves water quality; and LID, which establishes stormwater management techniques. As a result of these requirements, discretionary projects are reviewed for hydrology in a manner similar to that used for stormwater quality. Regulations require site design to account for hydrology, and drainage studies are required for projects with significant increases in impervious surfaces. Projects are discouraged from diverting or increasing flows that cross a site. Larger projects are subject to hydromodification requirements and must develop a project-level Hydromodification Management Plan.

The General Plan also includes several policies within the Conservation and Open Space Element and the Land Use Element that would further reduce the potential for the Alpine CPU to alter the existing drainage patterns of a site or area. The prior EIRs identified several mitigation measures addressing impacts related to erosion and siltation that would be applicable to the proposed project, including Hyd-1.2, Hyd-1.3, Hyd-1.5, and Hyd-3.1 through Hyd-3.3. These measures generally require that development maximize natural drainage and topography when conveying stormwater; comply with the JRMP; LID Handbook; Grading, Clearing and Watercourses Ordinance; and RPO, and implement measures to ensure that runoff flows from development are reduced to the maximum extent practicable and are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat.

Summary

The proposed project could allow for the development of a greater number of housing units compared to the current General Plan. Due to the increased development densities proposed in the Alpine CPA, operation of the proposed project could cause additional impacts related to erosion or siltation on or off site compared to that identified in the prior EIRs (Impact-HYD-7). Implementation of the General Plan policies and prior EIRs mitigation measures identified above and compliance with existing regulations would reduce the proposed project's impacts related to erosion and siltation to a **less than significant** level.

2.8.3.4 Issue 4: Result in Flooding

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would substantially alter the existing drainage pattern of the site or area, including alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

Impact Analysis

The prior EIRs determined that future development would have the potential to result in substantial alteration of existing drainage patterns and increase the rate or amount of surface runoff in a manner that would result in flooding on or off site during and after construction activities. In addition, the prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact associated with flooding. The discussion of impacts associated with flooding from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures that require compliance with LID standards to reduce runoff, limit development in floodplains, encourage use of natural channels, and utilize hydromodification management. Other mitigation measures that minimize stormwater impacts on drainage and flood control facilities were implemented to reduce impacts. The General Plan policies include measures that require implementing the Flood Damage Prevention Ordinance to reduce flood losses in specified areas and the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

The discussion of impacts for this issue is organized into the following subsections: (1) Construction Impacts and (2) Operational Impacts.

Construction Impacts

The proposed project includes increased densities in Subareas 2, 4, and 6,;decreased density in Subarea 5; and no change in density in Subareas 1, 3, and 7. The three subareas with proposed increased density would result in more development compared to the current General Plan. This increase in future development would result in temporary or permanent alteration of existing drainage patterns or stream flows and/or contribute to an increase in impervious surfaces. Land-disturbing construction activities associated with the development of future land uses as designated by the proposed project, such as grading and excavation, construction of new building foundations, roads, driveways, and trenches for utilities, would result in the localized alteration of drainage patterns. Temporary ponding and/or flooding could result from activities such as temporary alterations of the drainage system or the temporary creation of a sump condition. Such activities would have the potential to increase the rate or amount of surface runoff that may in turn result in flooding on or off site.

Federal, State, and Local Regulations and Existing Regulatory Processes

Future projects would need to comply with a number of local regulations that govern the rate or amount of surface runoff. The MS4 permit requires certain PDPs to comply with hydromodification management requirements, as specified in the BMP Manual, which address flow duration impacts and critical sediment yield areas; the permit also requires on-site BMPs to manage hydromodification that may be caused by stormwater runoff discharged from a project. The purpose of hydromodification management requirements for PDPs is to minimize the potential of stormwater discharges to alter flow regimes, leading to flooding. PDPs subject to hydromodification management requirements must provide flow control for post-project runoff to meet the flow control performance standard.

Another relevant regulation is the WPO, which requires PDPs to implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event (DCV). As a result of these requirements, discretionary projects are reviewed for hydrology in a manner similar to that used for stormwater quality. Regulations require site design to account for hydrology and drainage studies are required for projects that would significantly increase impervious surfaces. Projects are discouraged from

diverting or increasing flows that cross a site, and larger projects are subject to hydromodification requirements and must develop a project-level Hydromodification Management Plan.

The prior EIRs identified several mitigation measures in Sections 2.7.4 and 2.8.6 addressing impacts related to flooding on or off site that would be applicable to the proposed project, including Hyd-1.2 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3. These measures require compliance with the WPO and LID standards that limit runoff that results in flooding; require compliance with the RPO to restrict development in floodplains/floodways; require the implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; require the implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses; and require implementation and revision of BOS Policies that relate to impacts on floodways and flood-control measures.

Summary

The proposed project has the potential to result in construction impacts related to altering the existing drainage pattern or increasing the rate or amount of surface runoff that would be more severe compared to the development allowed under the current General Plan (Impact-HYD-8). Implementation of the General Plan policies and prior EIRs mitigation measures, and compliance with existing regulations, would reduce the proposed project's impacts related to flooding on- or off-site to a **less than significant** level.

Operational Impacts

The proposed project increases density in Subareas 2, 4, and 6, and therefore has the potential to alter the existing drainage pattern of a site or area by increasing the amount and rate of surface runoff, potentially resulting in flooding on or off site. Additionally, impermeable surfaces and development could create a diversion from the natural runoff pattern and potentially result in flooding.

In undeveloped areas, rainfall collects and is stored on vegetation, in the soil column, or in surface depressions. When this storage capacity is filled, runoff flows slowly through the soil as subsurface flow. In contrast, developed areas, where much of the land surface is covered by roads and buildings, have less capacity to store rainfall. Impermeable surfaces such as roads, roofs, parking lots, and sidewalks store little water and reduce infiltration of water into the ground, which accelerates runoff to ditches and streams.

Federal, State, and Local Regulations and Existing Regulatory Processes

Future projects would need to comply with a number of local regulations that govern the rate or amount of surface runoff. The MS4 permit requires certain PDPs to comply with hydromodification management requirements, as specified in the BMP Manual, which address flow duration impacts and critical sediment yield areas; the permit also requires on-site BMPs to manage hydromodification that may be caused by stormwater runoff discharged from a project. The purpose of hydromodification management requirements for PDPs is to minimize the potential of stormwater discharges to alter flow regimes, leading to flooding. PDPs subject to hydromodification management requirements must provide flow control for post-project runoff to meet the flow control performance standard.

Another relevant regulation is the WPO, which requires PDPs to implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event (DCV). As a result of these requirements, discretionary projects are reviewed for hydrology in a manner similar to that used

for stormwater quality. Regulations require site design to account for hydrology and drainage studies are required for projects that would significantly increase impervious surfaces. Projects are discouraged from diverting or increasing flows that cross a site, and larger projects are subject to hydromodification requirements and must develop a project-level Hydromodification Management Plan.

The General Plan also includes several policies within its Land Use Element and Safety Element that would reduce the potential for the proposed project to result in flooding on or off site. In addition, the prior EIRs identified several mitigation measures addressing impacts related to flooding on or off site that would be applicable to the proposed project, including Hyd-1.2 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3. These measures require compliance with the WPO and LID standards that limit runoff that results in flooding; require compliance with the RPO to restrict development in floodplains/ floodways; require the implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; require the implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses; and require implementation and revision of BOS Policies that relate to impacts on floodways and flood-control measures..

Summary

The proposed project has the potential to result in operational impacts that would be more severe compared to the development allowed under the current General Plan (Impact-HYD-9). Implementation of the General Plan policies and prior EIRs mitigation measures, and compliance with existing regulations, would reduce the proposed project's operational impacts related to flooding on- or off-site to a **less than significant** level.

2.8.3.5 Issue 5: Exceed Capacity of Stormwater Systems

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

Impact Analysis

The prior EIRs determined future development would have the potential to contribute runoff in a manner that would exceed existing stormwater drainage facilities. In addition, the prior EIRs concluded that the 2011 General Plan and FCI GPA would not contribute to a significant cumulative impact associated with the capacity of stormwater systems. The discussion of impacts associated with the capacity of stormwater systems from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures. Mitigation included measures requiring compliance with the WPO and LID standards, which limit runoff that results in flooding; and the RPO to restrict development in floodplains/floodways. Additionally, mitigation measures require the implementation of the Flood Damage Prevention Ordinance, to reduce flood losses in specified areas, and implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. Relevant General Plan policies would reduce the potential for exceeding existing stormwater drainage facilities, by requiring development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities, efficient irrigation systems, and stormwater filtration; require protection of water supply sources; and require development to minimize impervious surfaces.

The proposed project would increase densities in Subareas 2, 4, and 6 and has the potential to result in more development and impermeable surfaces compared to the current General Plan. Drainage facilities, including storm drains, culverts, inlets, channels, curbs, roads, or other such structures, are designed to prevent flooding by collecting stormwater runoff and directing flows to either the natural drainage course and/or away from urban development. If drainage facilities within the Alpine CPA are not adequately designed, built, or properly maintained, the capacity of the existing facilities can be exceeded, resulting in flooding and increased sources of polluted runoff.

Future development associated with the Alpine CPU in Subareas 2, 4, and 6 could exceed the capacity of the County's existing or planned stormwater drainage facilities. Construction and/or post-construction activities would have the potential to alter existing drainages and hydrology or increase the impermeable surfaces within Subareas 2, 4, and 6, thereby increasing the volume or rate of runoff. Future development would be required to incorporate design elements such as storm drains, ditches, swales, or other means of conveying runoff. If drainage facilities are not adequate to accommodate a potential increase in stormwater flows, overflow or failure of such systems may occur, causing an exceedance in the capacity of the County's stormwater systems.

Federal, State, and Local Regulations and Existing Regulatory Processes

The WPO regulation requires development projects to demonstrate they have provided stormwater facilities sized appropriately to accommodate runoff flows. Additional environmental regulations related to stormwater drainage facilities and stormwater discharges include Federal CWA, which regulates discharges of pollutants into waters of the US; California Water Code, which controls almost all considerations of water and its use; and Porter-Cologne Water Quality Control Act, which controls polluted discharges into state waters. These regulations often result in alternative ways of managing stormwater runoff other than constructing new conveyance systems or drainage facilities, such as reducing impervious surfaces in site design, incorporating LID techniques, and employing low-impact BMPs.

The General Plan includes several policies within the Conservation and Open Space Element, Land Use Element, and Safety Element that would reduce the potential for the Alpine CPU to exceed the capacity of the existing stormwater drainage facilities.

In addition, the prior EIRs identified several mitigation measures addressing impacts related to stormwater drainage facilities that would be applicable to the proposed project, including Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-3.1, and Hyd-4.1 through Hyd-4.3. These measures require compliance with the WPO and LID standards that limit runoff that results in flooding; require compliance with the RPO to restrict development in floodplains/floodways; implement and revise ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater; require the implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; require the implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses; and require implementation and revision of BOS Policies that relate to impacts on floodways and flood-control measures.

Summary

The proposed project would increase the development densities in Subareas 2, 4, and 6, compared to the current General Plan, therefore creating potential to increase the amount of impervious surfaces. Therefore, due to the increased development densities proposed, the proposed project would cause a

more severe impact related to exceeding existing stormwater drainage facilities compared to that identified in the prior EIRs (Impact-HYD-10). However, the proposed project would implement the applicable drainage and hydrology regulations and the proposed project would result in **less than significant** impacts on storm drain capacities.

2.8.3.6 Issue 6: Place Housing within a 100-Year Flood Hazard Area

Guidelines for the Determination of Significance Analysis

The Alpine CPU would have a significant impact if it would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map.

Impact Analysis

The prior EIRs determined that future development would result in the placement of housing within flood hazard areas and would not contribute to a significant cumulative impact associated with flood hazard areas. The discussion of impacts associated with flood hazard areas from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures that require compliance with the WPO, which limits runoff that results in flooding; utilization of the County Guidelines for Determining Significance, Surface Water Quality, Hydrology, and Groundwater Resources; compliance with the RPO to restrict development in floodplains/floodways and to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological, and drainage problems; implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; and implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. The General Plan provides policies that require development to be restricted in floodways and floodplains; require documentation and annual review of areas prone to flooding; require development management based on federal floodplain maps; allow new uses and development within the floodplain fringe only when environmental impacts and hazards are mitigated; and limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses.

As shown in a 2.8-5, a portion of Subarea 4 is located within a mapped County floodplain and adjacent to Subarea 2 (County of San Diego 2018a). FEMA map floodplains, shown in Figure 2.8-7a, show a mapped floodplain adjacent to Subarea 2. As shown in Figure 2.8-6a, a portion of Subarea 4 is located within a mapped County floodway.

Flood events in such areas could result in structural damage or loss, adverse effects on public health and safety, loss of public services (e.g., electricity or water service) or damage to infrastructure, or loss of the potential use on a property. Increased development of residential land uses in the floodplain would reduce the County's ability to respond to floodplain issues and would result in a greater potential for conflicts with flooding hazards.

Federal, State, and Local Regulations and Existing Regulatory Processes

Federal, state, and local regulations would reduce impacts related to the placement of housing within a 100-year flood hazard area. Because of regulations, development within floodplains, and development

that would have the potential to adversely affect flooding hazards are highly regulated and addressed at all levels of the County development review process.

The General Plan includes several policies within the Conservation and Open Space Element, Land Use Element, and Safety Element that would reduce the potential for the Alpine CPU to result in the placement of housing within flood hazard areas. In addition, the prior EIRs identified several mitigation measures addressing impacts related to housing within a 100-year Flood Hazard Area that would be applicable to the proposed project, including Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-6.1. These measures require compliance with the WPO, which limits runoff that results in flooding; utilization of the County Guidelines for Determining Significance, Surface Water Quality, Hydrology, and Groundwater Resources; compliance with the RPO to restrict development in floodplains/floodways and to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological, and drainage problems; implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; and implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

Summary

The proposed project would cause more severe impacts related to housing within a 100-year flood hazard area compared to development allowable under the current General Plan (Impact-HYD-11). However, implementation of the General Plan policies, and the prior EIRs mitigation measures, and compliance with existing regulations, would reduce the proposed project's impacts related to housing within a 100-year Flood Hazard Area to a **less than significant** level.

2.8.3.7 Issue 7: Impede or Redirect Flood Flows

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would place structures within a 100-year flood hazard area, which would impede or redirect flood flows.

Impact Analysis

The prior EIRs determined future development would not have the potential to impede or redirect flood flows and would not have the potential to result in a cumulative impact associated with impeding or redirecting flood flows. The discussion of impacts associated with impeding or redirecting flood flows from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant and mitigation was not required. The General Plan provides policies that require development to be restricted in floodways and floodplains; require documentation and annual review of areas prone to flooding; require development management based on federal floodplain maps; allow new uses and development within the floodplain fringe only when environmental impacts and hazards are mitigated; and limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses.

Development along stream channels and floodplains can alter the capacity of a channel to convey water and increase the height of the water surface corresponding to a given discharge. Structures that encroach on a floodplain, such as bridges, can increase upstream flooding by narrowing the width of the channel and increasing the channel's resistance to flow. As a result, the water is at a higher level as it flows past the obstruction, creating a backwater that could inundate a larger area upstream.

The proposed project would increase the potential for additional development to occur within 100-year flood hazard areas or the placement of structures that could impede or redirect flood flows within two of the subareas. A portion of Subarea 2 and the southwestern portion of Subarea 4 are located within a 100-year flood hazard area. Future development projects within the Alpine CPA would be required to conform with applicable regulations pertaining to the prohibition of structures within floodways.

Federal, State, and Local Regulations and Existing Regulatory Processes

The General Plan includes several policies within the Conservation and Open Space Element, Land Use Element, and Safety Element that would reduce the potential for the Alpine CPU to impede or redirect flood flows. In addition, the prior EIRs identified several mitigation measures addressing impacts related to redirecting or impeding flood flows that would be applicable to the proposed project, including Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1 through Hyd-4.3, and Hyd-6.1. These measures require compliance with the WPO, which limits runoff that results in flooding; utilization of the County Guidelines for Determining Significance, Surface Water Quality, Hydrology, and Groundwater Resources; compliance with the RPO to restrict development in floodplains/floodways and to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological, and drainage problems; implementation of the Flood Damage Prevention Ordinance to reduce flood losses in specified areas; and implementation of the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

Summary

The proposed project would increase the development density within 100-year flood hazard areas as compared to the development allowable under the current General Plan. Therefore, the Alpine CPU would result in potentially significant impacts associated with the placement of structures that would impede or redirect flood flows in areas subject to flood hazards. Due to the increased development densities in Subareas 2, 4, and 6, the proposed project would potentially cause greater impacts related to impeding or redirecting flood flows as compared to the prior EIRs (Impact-HYD-12). However, implementation of the General Plan policies and prior EIRs mitigation measures and compliance with existing regulations would reduce the proposed project's impacts related to impeding and redirecting flood flows to a **less than significant** level.

2.8.3.8 Issue 8: Expose People to Dam Inundation and Flood Hazards

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis

The prior EIRs determined future development would have the potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a levee or dam failure, by placing persons or housing in areas subject to flooding risks. In addition, the prior EIRs concluded that the 2011 General Plan and FCI GPA would not contribute to a significant cumulative impact associated with dam inundation and flood hazards. The discussion of impacts associated with dam inundation and flood hazards from implementation of the 2011 General Plan and FCI GPA can be found in

Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures requiring compliance with the WPO; utilization of the County Guidelines for Determining Significance, Surface Water Quality, Hydrology, and Groundwater Resources; compliance with the RPO; implementation of the Flood Damage Prevention Ordinance; implementation of the Grading, Clearing and Watercourses Ordinance; and regular inspections and maintenance of County reservoirs. The General Plan also provides policies requiring development to be restricted in floodways and floodplains; documentation and annual review of areas prone to flooding; development management based on federal floodplain maps; allowing new uses and development within the floodplain fringe only when environmental impacts and hazards are mitigated; and limiting new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses.

Flood events in areas from dam failure could result in structural damage or loss, adverse effects on public health and safety, loss of public services (e.g., electricity or water service) or damage to infrastructure, or loss of the potential use on a property. As shown in Figures 2.8-8a and 2.8-8b, approximately 43 acres within existing semi-rural residential land uses in the Alpine CPA are is located within dam inundation areas. As shown in Figures 2.8-8a and 2.8-8b, there are no dam inundation zones within the Village Boundary, and none of the subareas are located within dam inundation areas. Therefore, direct impacts of the proposed project with regard to the risk of loss, injury, or death involving flooding from the failure of a levee or dam would be **less than significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

Policies within the Conservation and Open Space Element, Land Use Element, and Safety Element that would reduce the potential for the proposed project to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding because of the failure of a levee or dam. In addition, the prior EIRs identified mitigation measures addressing impacts related to dam inundation and flood hazards, which require regular inspections of damns to prevent failure, and review of discretionary projects for dam inundation hazards; however, as stated above, none of the seven subareas are within dam inundation areas.

Summary

The proposed project would not result in more severe impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, compared to impacts identified in the prior EIRs. Implementation of the General Plan policies and compliance with existing regulations would ensure the proposed project's impacts related to inundation by mudflow are **less than significant**.

2.8.3.9 Issue 9: Expose People to Seiche, Tsunami, and Mudflow Hazards

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Impact Analysis

The prior EIRs determined that, due to the inland location of the unincorporated County and the history of minor tsunami events, implementation of the 2011 General Plan and FCI GPA would not expose people or structures to hazards associated with inundation by a tsunami and would not result in land uses or development within areas subject to inundation from a seiche. However, the prior EIRs determined that the 2011 General Plan and FCI GPA would locate land uses and development in areas considered susceptible to mudflows. The prior EIRs concluded that the 2011 General Plan and FCI GPA would not have the potential to result in a cumulative impact associated with significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. The discussion of impacts associated with significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.7 and 2.8, *Hydrology and Water Quality*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures that require development projects to maximize natural drainage and topography when conveying stormwater; compliance with the RPO; and compliance with the Grading, Clearing and Watercourses Ordinance. The General Plan also provides policies that restrict development in floodways and floodplains; direct development away from areas with high landslide, mudslide, or rock fall potential; and prohibit development from causing or contributing to slope instability.

Debris flows, also known as mudflows, are shallow water-saturated landslides that travel rapidly down slopes carrying rocks, brush, and other debris. A mudflow occurs naturally as a result of heavy rainfall on a slope containing loose soil or debris. There is potential for mudflows to occur in some areas of the unincorporated County as a result of large amounts of precipitation in a relatively short time frame. Similar direct effects related to mudflow would occur with future development of the proposed project, where structures would be placed within areas subject to mudflow events. Mudflow events in such areas could result in structural damage or loss, adverse effects on public health and safety, loss of public services (e.g., electricity or water service) or damage to infrastructure, or loss of the potential use on a property. Additionally, areas within the Alpine CPA are susceptible to wildland fires and subsequent flash floods and debris flows during rainstorms. Therefore, the proposed project would result in a potentially significant impact associated with mudflow hazards.

Federal, State, and Local Regulations and Existing Regulatory Processes

The General Plan includes several policies within the Conservation and Open Space Element and Safety Element that would reduce the potential for the proposed project to expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche or mudflow. In addition, the prior EIRs identified several mitigation measures addressing impacts related to inundation by seiche or mudflow that would be applicable to the proposed project, including Hyd-3.1 through Hyd-3.3. These measures require maximizing natural drainage and topography when conveying stormwater; compliance with the RPO to limit development on steep slopes; and compliance with the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.

Summary

The proposed project would locate land uses and development in areas considered susceptible to mudflows, which has the potential to cause significant impacts related to inundation by mudflow compared to the impact identified in the prior EIRs (Impact-HYD-13). However, implementation of the General Plan policies and prior EIRs mitigation measures and compliance with existing regulations would reduce the proposed project's impacts related to inundation by mudflow to a **less than significant** level.

2.8.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for hydrology and water quality includes cumulative projected growth and development within the San Diego River WMA and the San Diego Bay WMA. For groundwater supplies and recharge, the geographic scope includes cumulative projected growth and development in groundwater-dependent areas of the communities immediately surrounding the Alpine CPA. Lastly, because flooding can be both a localized and watershed-level issue, the geographic scope for flooding-related issues includes future growth and development within the Alpine CPA (outside of the project area) and/or the San Diego River WMA and the San Diego Bay WMA.

2.8.4.1 Issue 1: Violate Water Quality Standards and Requirements

The prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact associated with water quality standards. For the Alpine CPU, a cumulative water quality impact would occur if development associated with cumulative projected growth within the San Diego River WMA or San Diego Bay WMA would violate any water quality standards, otherwise degrade water quality, or violate any waste discharge requirements. Construction and development associated with cumulative projected growth would contribute pollutants to downstream receiving waters that have the potential to violate water quality standards. Cumulative development would be subject to regulations that require compliance with water quality standards, including the CWA; Porter-Cologne Water Quality Control Act; NPDES; applicable basin plans; and local regulations such as the County's JRMP, BMP Manual and WPO, and permanent BMPs (source control, site design, and structural) that would be implemented to reduce the discharge of pollutants to the maximum extent practicable. However, despite these regulations, cumulative development could incrementally contribute pollutants that, when combined, would still have the potential to degrade water quality and result in a cumulatively significant impact. Therefore, cumulative growth and development would result in a significant cumulative impact associated with the violation of water quality standards and requirements.

The proposed project would result in land use changes potentially increasing density and development in three subareas, which has the potential to violate water quality standards and requirements. As discussed in Section 2.8.3.1, future development associated with the proposed project would cause a similar project-level impact related to surface water and groundwater quality compared to the prior EIRs. Future development associated with the Alpine CPU would be required to comply with the above-mentioned regulations, which would reduce potential water quality impacts on an individual basis through implementation of temporary and permanent BMPs.

For the reasons described above, compliance with existing regulations and the implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.1 would reduce project-level impacts on surface water quality to less than significant. However, water quality can be affected by various individual pollutant sources that may be individually limited, but cumulatively considerable when taken into account together. As such, there is a potential that buildout of the Alpine CPU as a whole would contribute pollutants that, when combined with cumulative growth and development, would violate water quality standards and result in a cumulatively considerable impact on surface water quality. In addition, future development associated with the Alpine CPU could degrade groundwater quality.

As a result, future development associated with the Alpine CPU, when combined with cumulative growth and development, would result in a cumulatively considerable contribution to groundwater quality impacts. Therefore, the proposed project would have a **potentially significant cumulative impact** (**Impact-C-HYD-1**) associated with violating water quality standards and requirements would be similar to those identified the prior EIRs.

2.8.4.2 Issue 2: Deplete Groundwater Supplies and Interfere with Recharge

The prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact associated with groundwater resources. For the Alpine CPU, a cumulative impact associated with groundwater supplies would occur if development associated with cumulative projected growth would be located in groundwater-dependent areas within the communities immediately surrounding the Alpine CPA. An increase in future cumulative development in these areas would require the need for additional water and would have the potential to further deplete limited groundwater supplies. In addition, cumulative development in previously undeveloped areas would increase the amount of impervious surfaces from new buildings, roadways, parking lots, and sidewalks, all of which could interfere with groundwater recharge. If future cumulative development would result in significant groundwater supply and recharge impacts, then mitigation measures would be implemented to reduce impacts to the extent feasible. However, without the guarantee of available groundwater or imported water, a cumulative groundwater impact would occur, even after mitigation has been implemented for individual projects. Therefore, cumulative impacts on groundwater supplies and recharge from future growth and development would be significant.

The proposed project would result in land use changes facilitating future high-density development in areas that are groundwater dependent. Additionally, future development in previously undeveloped areas could interfere with groundwater recharge from increased areas of impervious surfaces. As such, the proposed project would cause a similar project-level impact related to groundwater supplies and recharge compared to the prior EIRs. For the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.2 would reduce this impact but not below a level of significance given the uncertainty surrounding the availability of long-term groundwater supplies to serve future development associated with the proposed project. As such, future development allowed under the proposed project, combined with future growth and development in groundwater-dependent areas, could further deplete groundwater supplies and interfere with recharge. Therefore, the proposed project would have a **potentially significant cumulative impact** (Impact-C-HYD-2) associated with the depletion of groundwater supplies and interference with recharge.

2.8.4.3 Issue 3: Result in Erosion or Siltation

The prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact related to erosion or siltation. For the Alpine CPU, a cumulative impact associated with erosion or siltation would occur if development associated with cumulative projected growth within the San Diego River WMA or San Diego Bay WMA would alter existing drainage patterns in a manner that would result in substantial erosion or siltation. Cumulative development would potentially increase impervious surfaces within the San Diego River WMA or San Diego Bay WMA, thereby increasing the amount of runoff that could result in erosion and siltation impacts. It is reasonably foreseeable that some cumulative development would occur simultaneously that, when combined, would have the potential to result in cumulative impacts associated with erosion and siltation. Therefore, cumulative erosion and siltation impacts from future growth and development would be significant.

Future development associated with the proposed project would increase relative to what was analyzed in the prior EIRs. As such, the proposed project would cause a similar project-level impact related to erosion and siltation compared to the 2011 General Plan and FCI GPA. For the reasons described above, compliance with federal, state, and local regulations addressing erosion and siltation, as well as the

implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.3 would reduce project-level impacts to less than significant. However, increases in impervious surfaces from individual projects associated with the proposed project could result in erosion and siltation that would be individually limited, but cumulatively considerable when taken into account together. As such, there is a potential that buildout of the Alpine CPU as a whole could include impervious surfaces that, when combined with cumulative growth and development, would result in erosion and siltation and a cumulatively considerable impact. Therefore, the proposed project would have a **potentially significant cumulative impact** (Impact-C-HYD-3) associated with erosion and siltation and impacts would be greater than that identified in the prior EIRs.

2.8.4.4 Issue 4: Result in Flooding

The prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact associated with flooding. For the proposed project, a cumulative impact associated with flooding would occur if development associated with cumulative projected growth within the Alpine CPA (outside of the project area) or within the San Diego River WMA or San Diego Bay WMA would convert permeable surfaces to impermeable surfaces, such as through the construction of buildings, parking lots, and roadways. Cumulative development would have the potential to alter existing drainage patterns, increase the amount of runoff, and increase flooding in the cumulative study area. Cumulative development that disturbs land would be subject to regulations reducing the potential for existing drainages to be altered in such a way that on- or off-site flooding would occur. Under the NPDES permit program, a SWPPP is prepared and BMPs are implemented for construction projects that disturb greater than 1 acre of land, which would reduce the potential for alterations in drainage to result in flooding. Similarly, existing regulations are in place to reduce the rate or amount of surface runoff during operations, including hydromodification management requirements specified in the BMP Manual. Additional existing regulations include the WPO, which requires PDPs to implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff. Therefore, cumulative impacts related to flooding from future growth and development would not be significant.

The proposed project would increase allowable density within the Alpine CPA in three subareas, which could result in increased future development and impervious surfaces. As a result, the proposed project would potentially cause more severe project-level impacts related to altering the existing drainage pattern of the site or area, or increasing the rate or amount of surface runoff in a manner resulting in flooding on or off site compared to the impacts identified in the prior EIRs. For the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.4 would reduce project-level impacts to less than significant. Increases in impervious surfaces from individual development projects associated with the proposed project could result in on- or off-site flooding that would be individually limited and have the potential to be cumulatively considerable when taken into account together. Therefore, the proposed project would have a **potentially significant cumulative impact** (**Impact-C-HYD-4**) associated with flooding.

2.8.4.5 Issue 5: Exceed Capacity of Stormwater Systems

The prior EIRs concluded that the 2011 General Plan and FCI GPA would not contribute to a significant cumulative impact associated with the capacity of stormwater systems. For the Alpine CPU, a cumulative impact associated with the capacity of existing stormwater systems would occur if development associated with cumulative projected growth within the Alpine CPA (outside of the project area) would contribute substantial quantities of runoff exceeding the capacity of existing stormwater drainage

systems. Future development associated with future projected growth would increase impermeable surfaces and have the potential to contribute substantial quantities of runoff that could exceed the capacity of existing stormwater drainage systems, potentially contributing to substantial additional sources of polluted runoff. However, a cumulative project that would exceed the capacity of a stormwater system would be unlikely to contribute to a cumulative impact because the area of exposure would be limited to the immediate surrounding area. Additionally, the majority of cumulative projects would be subject to CEQA and/or NEPA review, and local regulations that require development to construct or retrofit stormwater drainage systems so that they would not cause flooding. Therefore, a significant cumulative impact would not occur.

Future development associated with the proposed project could increase relative to what was analyzed in the prior EIRs. As such, the proposed project would cause a more severe significant project-level impact on the capacity of existing stormwater systems compared to the 2011 General Plan and FCI GPA. However, for the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.5 would reduce this project-level impact to less than significant. Therefore, the proposed project's contribution to cumulative impacts associated with the capacity of existing stormwater systems would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

2.8.4.6 Issue 6: Place Housing within a 100-Year Flood Hazard Area

The prior EIRs concluded that the 2011 General Plan and FCI GPA would not contribute to a significant cumulative impact associated with flood hazard areas. For the Alpine CPU, a cumulative impact would occur if development associated with cumulative projected growth within the Alpine CPA (outside of the project area) or within the San Diego River WMA or San Diego Bay WMA would contribute to placing housing within a 100-year flood hazard area. However, cumulative development would be required to comply with applicable regulations, such as the National Flood Insurance Act, National Flood Insurance Reform Act, and Cobey-Alquist Floodplain Management Act, which prohibit placing housing in floodways. Therefore, given existing regulations, a cumulative impact would not occur as a result of future projected growth.

Future development associated with the proposed project could increase relative to what was analyzed in the prior EIRs, including in areas identified as a 100-year floodplain. As such, the proposed project would cause a more severe significant project-level impact related to placing housing within a 100-year flood hazard area compared to the 2011 General Plan and FCI GPA. However, for the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.6 would reduce this project-level impact to less than significant. Therefore, the proposed project's contribution to cumulative impacts associated with the placement of housing within a 100-year flood hazard area would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

2.8.4.7 Issue 7: Impede or Redirect Flood Flows

The prior EIRs concluded that the 2011 General Plan and FCI GPA would not have the potential to result in a cumulative impact associated with impeding or redirecting flood flows. For the Alpine CPU, a cumulative impact associated with impeding or redirecting flood flows would occur if development associated with cumulative projected growth within the Alpine CPA (outside of the project area) or within the San Diego River WMA or San Diego Bay WMA would place structures within a 100-year flood hazard area that would impede or redirect flood flows, resulting in flooding elsewhere. However, cumulative

projects would be required to comply with applicable regulations, such as the National Flood Insurance Act, National Flood Insurance Reform Act, and Cobey-Alquist Floodplain Management Act, which prohibit placing housing in floodways. Therefore, given existing regulations, a significant cumulative impact would not occur as a result of future projected growth.

Future development associated with the proposed project could increase relative to what was analyzed in the prior EIRs, including in areas identified as a 100-year floodplain. As such, the proposed project would cause a more severe significant project-level impact related to placing structures within a 100-year flood hazard area that would impede or redirect flood flows compared to the 2011 General Plan and FCI GPA. However, for the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.7 would reduce this project-level impact to less than significant. Therefore, the proposed project's contribution to cumulative impacts associated with the placement of structures within a 100-year flood hazard area that would impede or redirect flood flows would be greater than that identified in the prior EIRs; however, cumulative impacts **would not be cumulatively considerable**.

2.8.4.8 Issue 8: Expose People to Dam Inundation and Flood Hazards

The prior EIRs concluded that the 2011 General Plan and FCI GPA would not have the potential to result in a cumulative impact associated with dam inundation and flood hazards. For the Alpine CPU, a cumulative impact associated with dam inundation and flood hazards would occur if development associated with cumulative projected growth within the Alpine CPA (outside of the project area) or within the San Diego River WMA or San Diego Bay WMA would contribute to the amount of housing or structures within dam inundation areas. However, cumulative projects would be required to comply with applicable regulations, such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act, and local regulations. Therefore, given existing regulations, a significant cumulative impact would not occur as a result of future projected growth.

The proposed project would not increase development densities within dam inundation areas. Therefore, the proposed project would not result in more severe project-level impacts related to exposing people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, compared to the 2011 General Plan and FCI GPA. The proposed project's contribution to cumulative impacts associated with dam inundation and flood hazards would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

2.8.4.9 Issue 9: Expose People to Seiche, Tsunami, and Mudflow Hazards

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA could result in an increased risk of exposing people or structures to damage in the event of a mudflow; however, it would not contribute to a significant cumulative impact. The FCI EIR also concluded that the 2011 General Plan and FCI GPA area would not be impacted by seiche or tsunami. For the Alpine CPU, a cumulative impact associated with mudflow hazards would occur if development associated with cumulative projected growth would contribute to the number of people or structures exposed to a significant risk of loss, injury, or death involving inundation by mudflows.

Mudflows would potentially affect cumulative development, especially in surrounding communities that have been affected by extreme wildfire events in the past. However, the majority of cumulative

development would be subject to applicable regulations. Therefore, given existing regulations, a significant cumulative impact would not occur as a result of future projected growth.

Future development associated with the proposed project could increase compared to what was analyzed in the prior EIRs, including in areas susceptible to mudflow. As such, the proposed project would cause a more severe significant project-level impact related to mudflow compared to the 2011 General Plan and FCI GPA. However, for the reasons described above, compliance with existing regulations and implementation of the General Plan policies and mitigation measures noted in Section 2.8.6.8 would reduce this project-level impact to less than significant. Therefore, the proposed project's contribution to cumulative impacts associated with seiche, tsunami, and mudflow would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

2.8.5 Significance of Impacts Prior to Mitigation

Impact-HYD-1: Violate Surface Water Quality Standards and Requirements during Construction Activities. Due to increased development densities in the proposed project, construction of the proposed project would cause a more severe impact related to surface water quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-2: Violate Surface Water Quality Standards and Requirements during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed project would cause a more severe impact related to surface water quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-3: Violate Groundwater Quality Standards and Requirements during Construction Activities. Due to increased development densities in the proposed project, construction of the proposed project would cause a more severe potentially significant impact related to groundwater quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-4: Violate Groundwater Quality Standards and Requirements during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed project would cause a more severe potentially significant impact related to groundwater quality standards and requirements compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-5: Substantially Deplete Groundwater Supplies or Interfere Substantially with Groundwater Recharge. Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impact related to depleting groundwater supplies and interfering with recharge compared to the impact identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-6: Result in Substantial Erosion or Siltation On- or Off-Site during Construction Activities. Due to increased development densities in the proposed project, construction of the proposed project would cause more severe impacts related to erosion or siltation on or off site compared to impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-7: Result in Substantial Erosion or Siltation On- or Off-Site during Operational Activities. Due to increased development densities in the proposed project, operation of the proposed

project would cause more severe impacts related to erosion or siltation on or off site compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-8: Result in Flooding On- or Off-Site during Construction Activities. Due to increased development densities in the proposed project, construction of the proposed project would cause more severe potentially significant impacts related to flooding on or off site compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-9: Result in Flooding On- or Off-Site during Operational Activities. Due to increased development in the proposed project, operation of the proposed project would cause more severe potentially significant impacts related to flooding on or off site compared to the impacts identified in the prior EIRs. This would be considered a significant impact.

Impact-HYD-10: Exceed Capacity of Existing Stormwater Drainage Facilities. Due to increased development densities in the proposed project, the proposed project would cause more severe impacts related to exceeding existing stormwater drainage facilities compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-11: Place Housing Within a 100-Year Flood Hazard Area. Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impacts related to placing housing within a 100-year flood hazard area compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-12: Impede or Redirect Flood Flows. Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impacts related to impeding or redirecting flood flows compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation.

Impact-HYD-13: Expose People to Inundation by Mudflow. Due to increased development densities in the proposed project, the proposed project would cause more severe potentially significant impacts related to inundation by mudflow compared to the impacts identified in the prior EIRs. This would be considered a significant impact prior to mitigation**.**

Impact-C-HYD-1: Result in a Cumulatively Considerable Contribution to Violating Water Quality Standards and Requirements. The proposed project would cause a similar impact related to violating water quality standards and requirements compared to the impact identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-HYD-2: Result in a Cumulatively Considerable Contribution to Substantially Depleting Groundwater Supplies or Interfering Substantially with Groundwater Recharge. The proposed project would cause a similar impact related to depleting groundwater supplies and interfering with groundwater recharge compared to the impacts identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-HYD-3: Result in a Cumulatively Considerable Contribution to Erosion or Siltation. Increases in impervious surfaces from individual projects associated with the proposed project could result in erosion and siltation that would be individually limited, but cumulatively considerable when taken into account together. As such, there is a potential that buildout of the proposed project as a whole could include impervious surfaces that, when combined with cumulative growth and development, would result in erosion and siltation and a cumulatively considerable impact. Consequently, the proposed project's contribution to cumulative impacts associated with erosion and siltation would be more severe

than that identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-HYD-4: Result in a Cumulatively Considerable Contribution to On- or Offsite Flooding. Increases in impervious surfaces from individual projects associated with the proposed project could result in on- or off-site flooding that would be individually limited, and cumulatively considerable when taken into account together. There is a potential that buildout of the proposed project could include impervious surfaces that, when combined with cumulative growth and development, would result in on- or off-site flooding and a cumulatively considerable impact. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.8.6 Mitigation

2.8.6.1 Issue 1: Violate Water Quality Standards and Requirements

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-1 and Impact-HYD-2, and Impact-HYD-3 related to water quality to **less than significant.**

Implementation of FCI EIR mitigation measures in combination with existing regulations and applicable General Plan policies would reduce Impact-HYD-4 and Impact-C-HYD-1, but not to a level below significance; therefore, those impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts associated with hydrology to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.

- Provide a water treatment system that reduces constituents to below the maximum contamination levels in all groundwater impaired areas.

  Explanation: This measure would require treatment plants in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the project objective to minimize public costs and infrastructure.

- In groundwater quality impaired areas, require water to be imported from other sources.

  Explanation: This measure would not be feasible based on the existing lack of infrastructure needed to import water to impaired areas. To provide such infrastructure would conflict with the project objectives to minimize public costs of infrastructure and services and correlate their timing with new development.

- In groundwater quality impaired areas, place a moratorium on building permits and development applications.

  Explanation: This measure would be inconsistent with the land use designations proposed for the project. It would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Proposed Project, which is to accommodate a reasonable amount of growth.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-1.2 through Hyd-1.10 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts to water quality.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine Community Plan Area.

2.8.6.2 Issue 2: Deplete Groundwater Supplies and Interfere with Recharge

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-5 and Impact-C-HYD-2 related to groundwater resources, but not to a level below significant; therefore, the impacts would remain **significant and unavoidable.**

Infeasible Mitigation Measures

The County has determined the following measures to be infeasible and therefore these measures would not be implemented.

- In areas with potentially impacted groundwater supplies, require all proposed discretionary projects to share well water through a well sharing agreement.

  Explanation: This mitigation measure would prove to be infeasible or unenforceable, because such agreements would only apply to current landowners and would not be binding on future owners of the affected properties.

- In areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other groundwater providers to import water through the construction of new infrastructure from another groundwater basin that is not impacted, prior to the issuance of discretionary permits.

  Explanation: This mitigation measure is considered infeasible because piping in groundwater from an off-site source would be a complex and costly process, which would involve any number of issues, including (1) water rights issues; (2) need to obtain proper permits to encroach on public roadways or other private properties to convey the water; (3) potential need to create a new water district/water company; and (4) accelerated deterioration of the groundwater basin that is providing the imported water. Additionally, requiring complex piping to import groundwater from an alternative location has the potential to result in multiple secondary environmental impacts, including cultural resources, biological resources, and hydrology/water quality. Although some water districts within the unincorporated County have imported water from another groundwater basin in the past, requiring that all development obtain water contracts, as described above, would put an undue burden on both the developer and water district/company. Implementing this mitigation measure would also contradict the General Plan objective to promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County character and ecological importance, because it would

result in multiple secondary environmental impacts to both unincorporated County groundwater and surface resources. In addition, this solution may not be sustainable for all projects in the long term. Implementation of this mitigation measure would also conflict with the project objective to minimize costs of infrastructure and services because this mitigation measure would require extensive infrastructure costs to implement. Therefore, for the reasons listed above, this measure is considered infeasible.

- In groundwater-dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other water providers to truck in water from local water districts or other sources such as an off-site well, prior to the issuance of discretionary permits.

  Explanation: This mitigation measure is considered infeasible because trucked water is not a guaranteed, sustainable, long-term source of water, since a water district can rescind or preclude the selling of trucked water in times of drought and limited water supplies. Additionally, implementation of this mitigation measure would conflict with the project objective to maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change, because it would require extensive vehicle travel and is not a sustainable solution. Therefore, this would not be a feasible mitigation measure.

- In groundwater-dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with a SDCWA member agency in order to import water from SDCWA facilities.

  Explanation: This mitigation measure is considered infeasible due to the lack of infrastructure in place to convey the water, the limited availability of water within the desert southwest, the cost of providing these services, and the discretionary approval to extend the SDCWA boundary, which is outside of the County's jurisdiction. Implementation of this mitigation measure would also conflict with the project objective to minimize costs of infrastructure and services, because the implementation of this mitigation measure would result in extensive infrastructure costs.

- Implement a Countywide moratorium on building permits and development applications in any areas of the County that would have the potential to adversely impact groundwater supplies and recharge.

  Explanation: This would effectively result in no new impacts to groundwater supplies and recharge within the unincorporated County. However, this measure would impede the County's ability to implement the General Plan Update because it would prohibit future development in areas identified for increased growth within the General Plan. This mitigation measure would also conflict with the project objective to support a reasonable share of projected regional population growth. Therefore, for the reasons listed above, this mitigation measure would not be implemented.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-2.1, Hyd-2.2, Hyd-2.4, and Hyd-2.5 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on groundwater supplies. Prior EIR mitigation measures **Hyd-1.2** through **Hyd-1.5** would also reduce impacts, but not to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.3 Issue 3: Result in Erosion or Siltation

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-6, Impact-HYD-7, and Impact-C-HYD-3 related to erosion and siltation, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measure

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-3.1 through Hyd-3.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to erosion.

Prior EIR mitigation measures Hyd-1.2, Hyd-1.3, and Hyd-1.5 would also further reduce direct and cumulative impacts to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.4 Issue 4: Result in Flooding

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-8, Impact-HYD-9, and Impact-C-HYD-4 related to flooding, to **less than significant**. !!

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-4.1 through Hyd-4.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to flooding.

Prior EIR mitigation measures Hyd-4.1 and 4.2, mitigation measures Hyd-1.2 through Hyd-1.5 and Hyd-2.5 would also reduce direct impacts to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.5 Issue 5: Exceed Capacity of Storm Water Systems

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs mitigation measures would reduce Impact-HYD-10 related to exceeding capacity of stormwater systems, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

Mitigation measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-3.1, and Hyd-4.1 through Hyd-4.3 would further reduce impacts to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.6 Issue 6: Place Housing within a 100-year Flood Hazard Area

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-11 related to placing housing within a 100-year flood hazard area, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measure is being carried forward and shall apply to the proposed project: Hyd-6.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this mitigation measure would reduce the proposed project's impacts related to placing housing within a 100-year flood hazard area. Prior EIR mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, and Hyd-4.2 would reduce impacts to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.7 Issue 7: Impede or Redirect Flood Flows

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce (Impact-HYD-12) impacts related to impeding or redirecting flood flows, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

Mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1 through Hyd-4.3, and Hyd-6.1 would reduce impacts to a level below significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.8 Issue 8: Expose People to Dam Inundation and Flood Hazards

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. The proposed project would not result in any new or more severe impacts that would expose people to dam inundation and flood hazards compared to the impacts identified in the prior EIRs. The proposed

project's impacts related to exposing people to dam inundation and flood hazards would be **less than significant**. Therefore, no additional mitigation measures would be required.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-8.1 and Hyd-8.2 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to exposure of people to damn inundation and flood hazards.

Prior EIRs mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1 through Hyd-4.3, and Hyd-6.1 would also reduce impacts to less than significant.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.6.9 Issue 9: Expose People to Seiche, Tsunami, and Mudflow Hazards

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce Impact-HYD-13 related to exposure of people to seiche, tsunami, and mudflow hazards, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Hyd-3.1 through Hyd-3.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to exposure of people to seiche, tsunami, and mudflow hazards.

Alpine CPU Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.8.7 Conclusion

2.8.7.1 Issue 1: Violate Water Quality Standards and Requirements

Implementation of the proposed project would increase development density and population compared to the development allowed under the current General Plan. The proposed density and population increase would contribute to surface water quality contaminants during construction (Impact-HYD-1) and operation (Impact-HYD-2) resulting in a potentially significant direct impact on surface water quality standards and requirements. The proposed project would contribute to groundwater quality contaminants during construction (Impact-HYD-3) and during operation (Impact-HYD-4), resulting in a potentially significant direct impact on groundwater quality standards and requirements. Additionally, the proposed project would result in a cumulatively considerable contribution to a significant cumulative impact associated with groundwater quality standards and requirements (Impact-C-HYD-1).

Future development projects would be required to comply with the County's JRMP, BMP Manual and WPO, and permanent BMPs (source control, site design, and structural) that would reduce the discharge of

pollutants that could impact surface waters. Several General Plan policies address water quality; these policies include COS-4.2, COS-4.3, COS-5.2, COS-5.3, COS-5.5, LU-6.5, LU-6.9, and LU-14.2 through LU-14.4. Compliance with existing regulations, applicable General Plan policies, and prior EIRs mitigation measures Hyd-1.2 through Hyd-1.10 would reduce impacts on surface water quality standards and requirements to less than significant. However, the proposed project's impacts associated with operation groundwater quality would not be mitigated to below a level of significance and would remain significant and unavoidable. Therefore, Impact-HYD-4 and Impact-C-HYD-1 associated with groundwater quality would be **significant and unavoidable.**

2.8.7.2 Issue 2: Deplete Groundwater Supplies and Interfere with Recharge

Implementation of the proposed project would increase development density and population in three subareas, compared to the development allowable under the current General Plan. Therefore, this would be considered a significant impact of the proposed project (Impact-HYD-5). Also, the proposed project's contribution to cumulative impacts associated with groundwater supplies and recharge would be greater than that identified in the prior EIRs and would be **cumulatively considerable** (Impact-C-HYD-2).

Future development projects within the Alpine CPA would be required to comply with applicable regulations, including the County's Groundwater Ordinance. Several General Plan policies address groundwater supplies and recharge; these policies include COS-4.1, COS-5.2, LU-8.1, LU-8.2, LU-13.1, and LU-13.2. Compliance with existing regulations, applicable General Plan policies, and prior EIRs mitigation measures Hyd-2.1, Hyd-2.2, Hyd-2.4, and Hyd-2.5 would reduce the project-level impact, but not to a level below significant. Therefore, Impact-HYD-5 and Impact-C-HYD-2 associated with groundwater supplies and recharge would be **significant and unavoidable.**

2.8.7.3 Issue 3: Result in Erosion or Siltation

Implementation of the Alpine CPU would increase development density compared to the development allowable under the General Plan. The proposed density increase would have the potential to result in increased runoff that has the potential to cause new erosion or worsen existing erosion problems. Therefore, the construction and operation of the proposed project would be considered significant impacts of the proposed project (Impact-HYD-6 and Impact-HYD-7).

Additionally, there is a potential that buildout of the Alpine CPU could include impervious surfaces that, when combined with cumulative growth and development, would result in erosion and siltation and a significant cumulative impact. Therefore, the proposed project's contribution to cumulative impacts associated with erosion and siltation would be greater than that identified in the 2011 General Plan EIR but would be consistent with the overall impact identified in the FCI EIR (Impact-C-HYD-3).

Future development projects within the Alpine CPA would be required to comply with applicable regulations, including the JRMP; LID standards; Grading, Clearing and Watercourses Ordinance; and the RPO. Several General Plan policies address groundwater supplies and recharge; these policies include COS-5.3, LU-6.5, and LU-6.9. Compliance with existing regulations; applicable General Plan policies; and prior EIRs mitigation measures Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3 would further reduce the proposed project's direct and cumulative impacts associated with erosion and siltation to below a level of significance. Therefore, Impact-HYD-6, Impact-HYD-7, and Impact-C-HYD-3 would be reduced to **less than significant.**

2.8.7.4 Issue 4: Result in Flooding

Implementation of the proposed project would increase development density compared to the current General Plan. Construction and operation of future development associated with implementation of the proposed project would convert more permeable surfaces to impermeable surfaces compared to the current General Plan, potentially creating more severe impacts associated with flooding on or off site. Therefore, the proposed project would result in potential significant impacts during construction (Impact-HYD-8) and operation (Impact-HYD-9). Additionally, there is a potential that buildout of the Alpine CPU as a whole would result in impervious surfaces that, when combined with cumulative growth and development, would result in on- or off-site flooding and a cumulatively considerable impact (Impact-C-HYD-4).

Future development projects within the Alpine CPA would be required to comply with applicable regulations, including the WPO, BMP Manual, and RPO. Several General Plan policies address flooding; these policies include LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4, and S-10.6. Compliance with existing regulations; applicable General Plan policies; and prior EIRs mitigation measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-4.3 would reduce the proposed project's direct and cumulative impacts associated with flooding potential to below a level of significance. Therefore, Impact-HYD-8, Impact-HYD-9, and Impact-C-HYD-4 would be reduced to **less than significant and would not be cumulatively considerable**.

2.8.7.5 Issue 5: Exceed Capacity of Stormwater Systems

Implementation of the proposed project would increase development density compared to the current General Plan. Future development associated with implementation of the proposed project could exceed the capacity of existing stormwater drainage facilities. However, with implementation of regulations, this impact would be similar to the prior EIRs (Impact-HYD-10). The proposed project's contribution to cumulative impacts associated with exceeding the capacity of stormwater systems would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

Future development projects within the Alpine CPA would be required to comply with applicable regulations, including the WPO. Several General Plan policies address flooding; these policies include COS-4.2 through COS-4.4, COS-5.2, COS-5.3, COS-5.5, LU-6.5, LU-6.9, LU-6-10, LU-14.2, LU-14.4, S-9.2, and S-10.2 through S-10.6. Compliance with existing regulations; applicable General Plan policies; and prior EIRs mitigation measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3 would further reduce the proposed project's direct impact associated with stormwater systems capacity potential to below a level of significance. Therefore, Impact-HYD-10 would be reduced to **less than significant**.

2.8.7.6 Issue 6: Place Housing within a 100-year Flood Hazard Area

Implementation of the proposed project would increase development density compared to the current General Plan. Future development associated with implementation of the proposed project could place housing within a 100-year flood hazard area. Therefore, this would be considered a significant impact of the proposed project (Impact-HYD-11). The proposed project's contribution to cumulative impacts associated with placing housing within a 100-year flood hazard area would be similar to that identified in the prior EIRs and **would not be cumulatively considerable**.

Future development projects within the Alpine CPA would be required to comply with applicable regulations. Several General Plan policies address placing housing within a 100-year flood hazard area;

these policies include COS-5.1, LU-6-12, S-9.1 through S-9.5, and S-10.1. Compliance with existing regulations; applicable General Plan policies; and prior EIRs mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-6.1 would reduce the proposed project's impact associated with placement of housing within a 100-year flood hazard area to below a level of significance. Therefore, Impact-HYD-11 would be reduced to **less than significant.**

2.8.7.7 Issue 7: Impede or Redirect Flood Flows

Implementation of the proposed project would increase development density compared to the current General Plan. Future development associated with implementation of the proposed project could impede or redirect flood flows. Therefore, this would be considered a significant impact of the proposed project (Impact-HYD-12). The proposed project's contribution to cumulative impacts associated with impeding or redirecting flood flows would be similar to that identified in the prior EIRs and **would not be cumulatively considerable.**

Future development projects within the Alpine CPA would be required to comply with applicable regulations. Several General Plan policies address impeding or redirecting flood flows; these policies include COS-5.1, LU-6-16, S-9.1 through S-9.5, and S-10.1. Compliance with existing regulations; applicable General Plan policies; and prior EIRs mitigation measures Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1 would reduce the proposed project's impact associated with redirecting or impeding or redirecting flood flows to below a level of significance. Therefore, Impact-HYD-12 would be reduced to **less than significant.**

2.8.7.8 Issue 8: Expose People to Dam Inundation and Flood Hazards

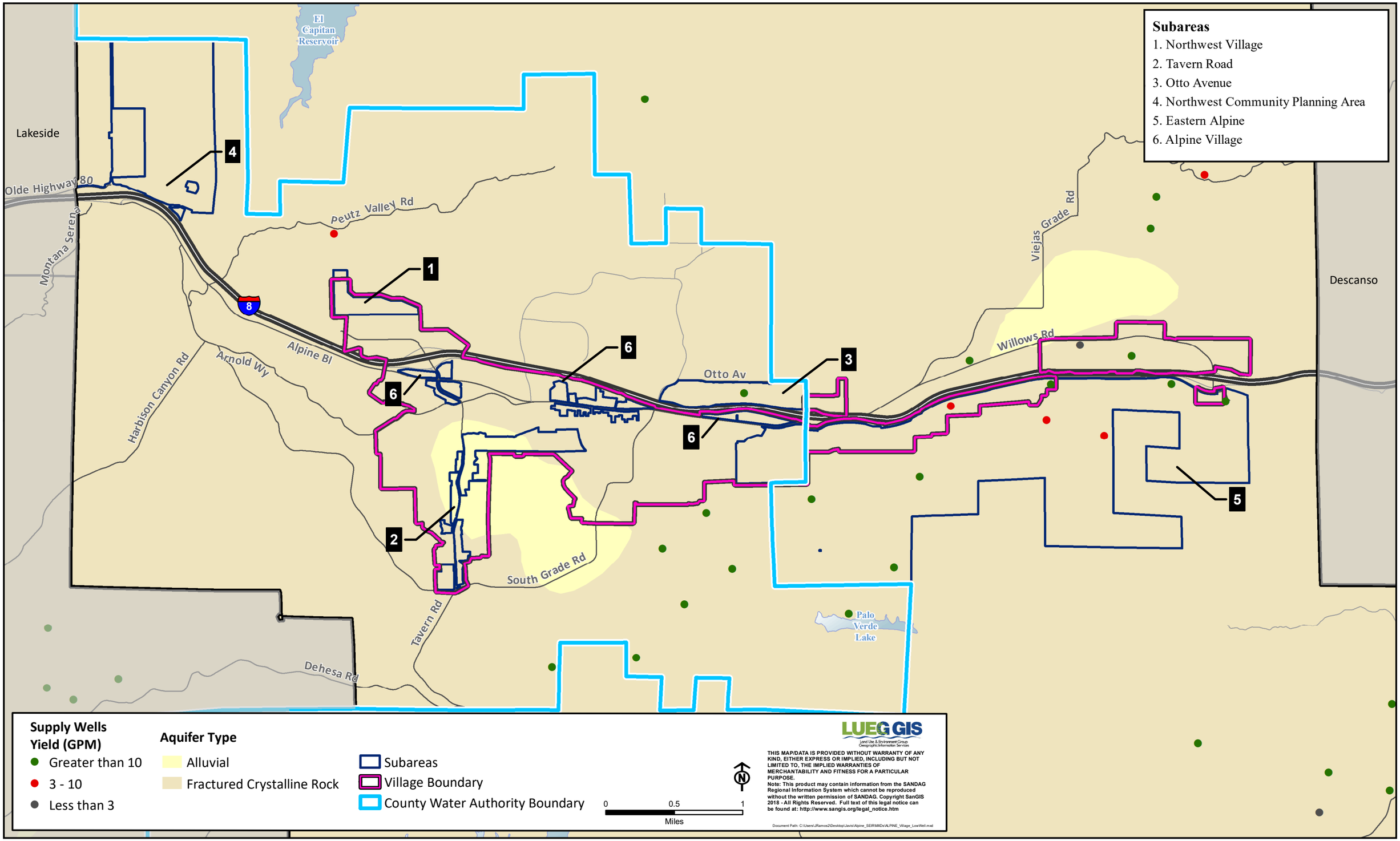
Implementation of the proposed project would increase development density and population compared to the current General Plan, but not within a dam inundation zone. Future development associated with implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, as a result of the failure of a levee or dam. Therefore, direct impacts are **less than significant.** Also, the proposed project's contribution to cumulative impacts associated with dam inundation and flood hazards would be similar to that identified in the prior EIRs and **would not be cumulatively considerable.**

2.8.7.9 Issue 9: Expose People to Seiche, Tsunami, and Mudflow Hazards

Implementation of the proposed project would increase development density and population anticipated compared to the current General Plan. The Alpine CPA would not be subject to seiche or tsunami; however, future development associated with implementation of the proposed project could expose people or structures to a significant risk of loss, injury, or death involving inundation mudflow. Therefore, this would be considered a more severe significant impact of the proposed project (Impact-HYD-13). The proposed project's contribution to cumulative impacts associated with seiche, tsunami, or mudflow hazards would be similar to that identified in the prior EIRs and **would not be cumulatively considerable.**

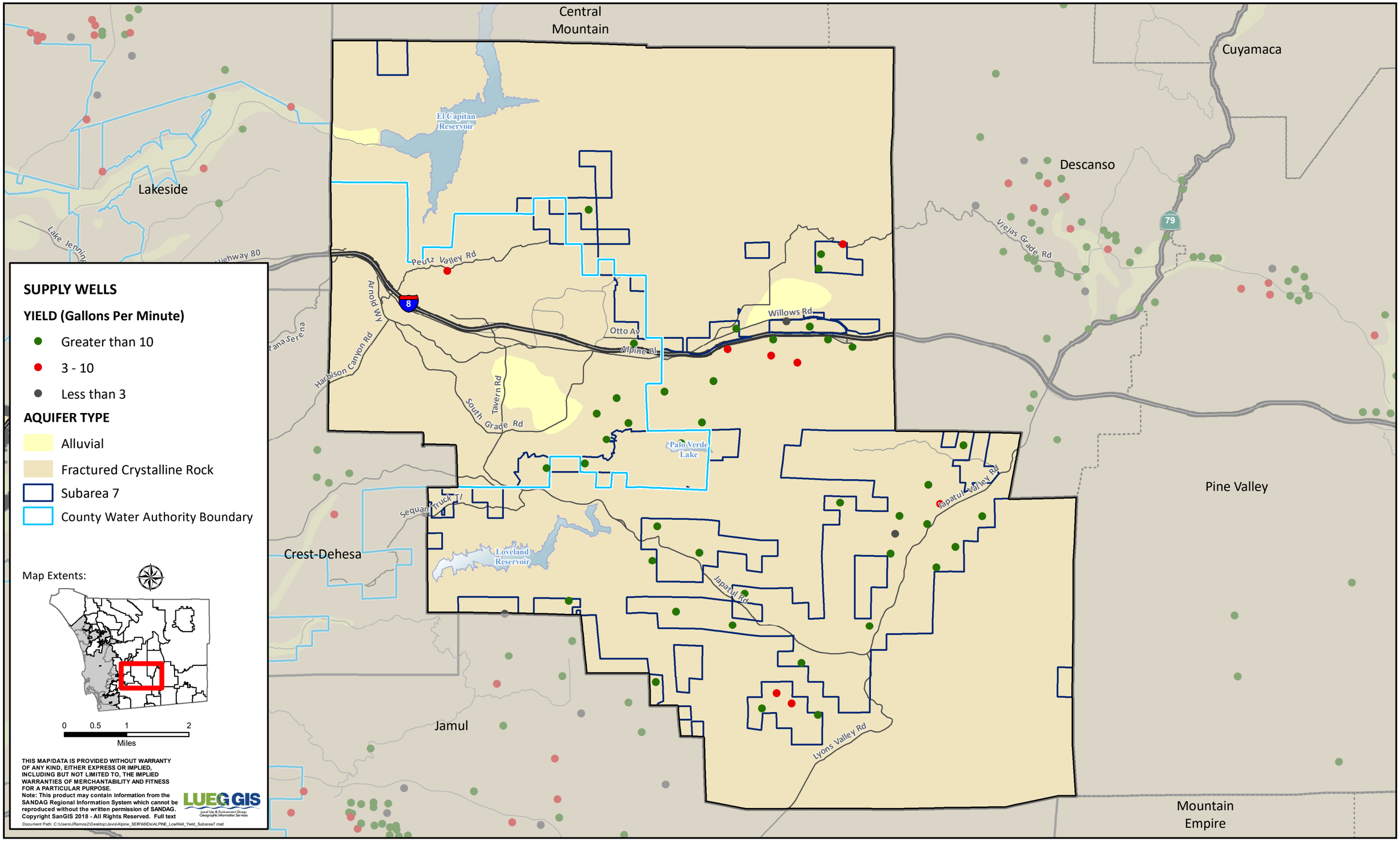
Future development projects within the Alpine CPA would be required to comply with applicable regulations. Several General Plan policies address mudflows; these policies include COS-5.1, S-8.1, S-8.2, S-9.3, and S-9.6. Compliance with existing regulations; applicable General Plan policies; and prior EIRs

mitigation measures Hyd-3.1, Hyd-3.2, and Hyd-3.3 would reduce the proposed project's impact associated with inundation by mudflows to below a level of significance. Therefore, Impact-HYD-13 would be reduced to **less than significant.**



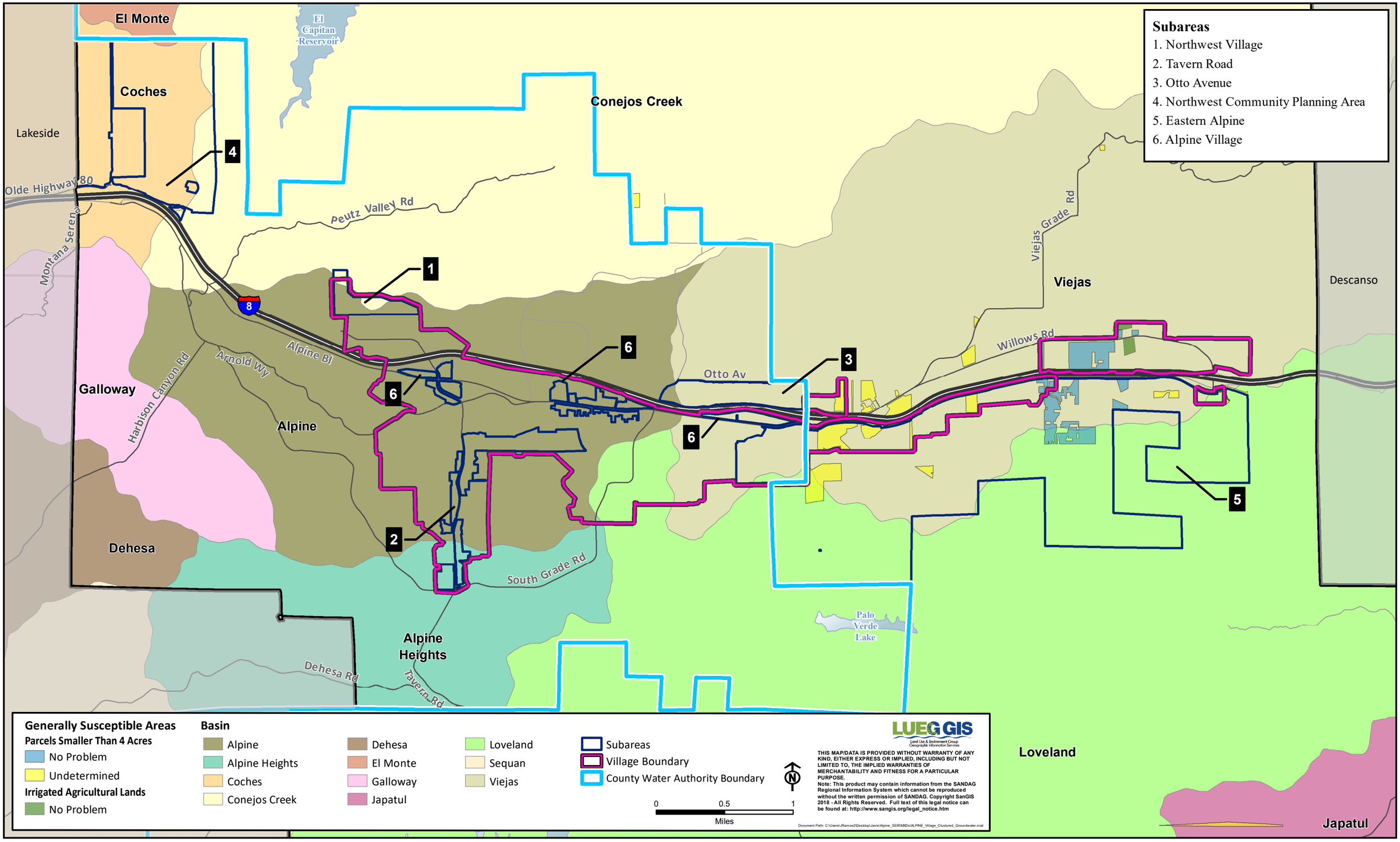
Source: SanGIS, County of San Diego, 2019

Figure 2.8-1a
Aquifer Type and Potential Low Well Yield Map
Subareas 1-6



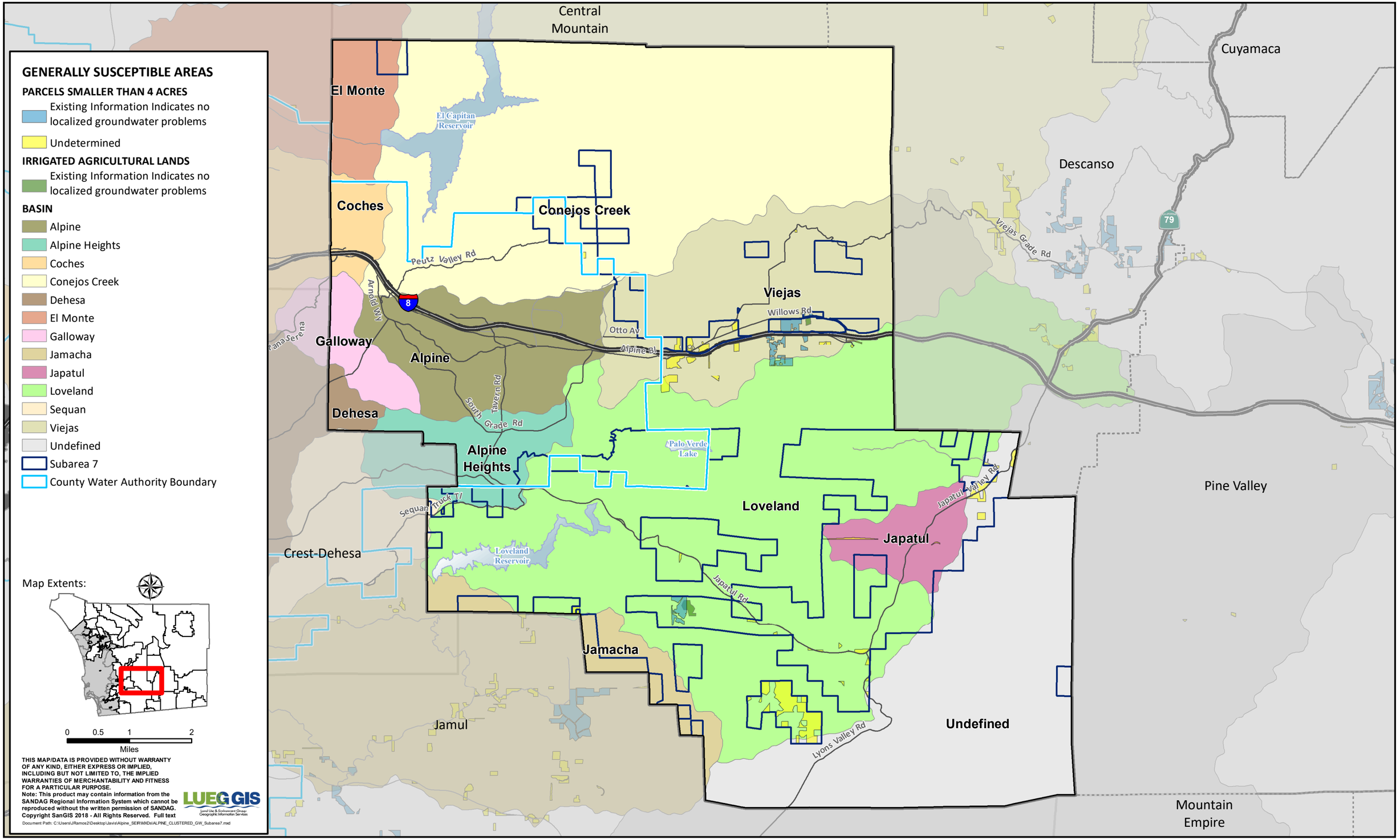
Source: SanGIS, County of San Diego, 2020

Figure 2.8-1b
Aquifer Type and Potential Low Well Yield Map
Subarea 7



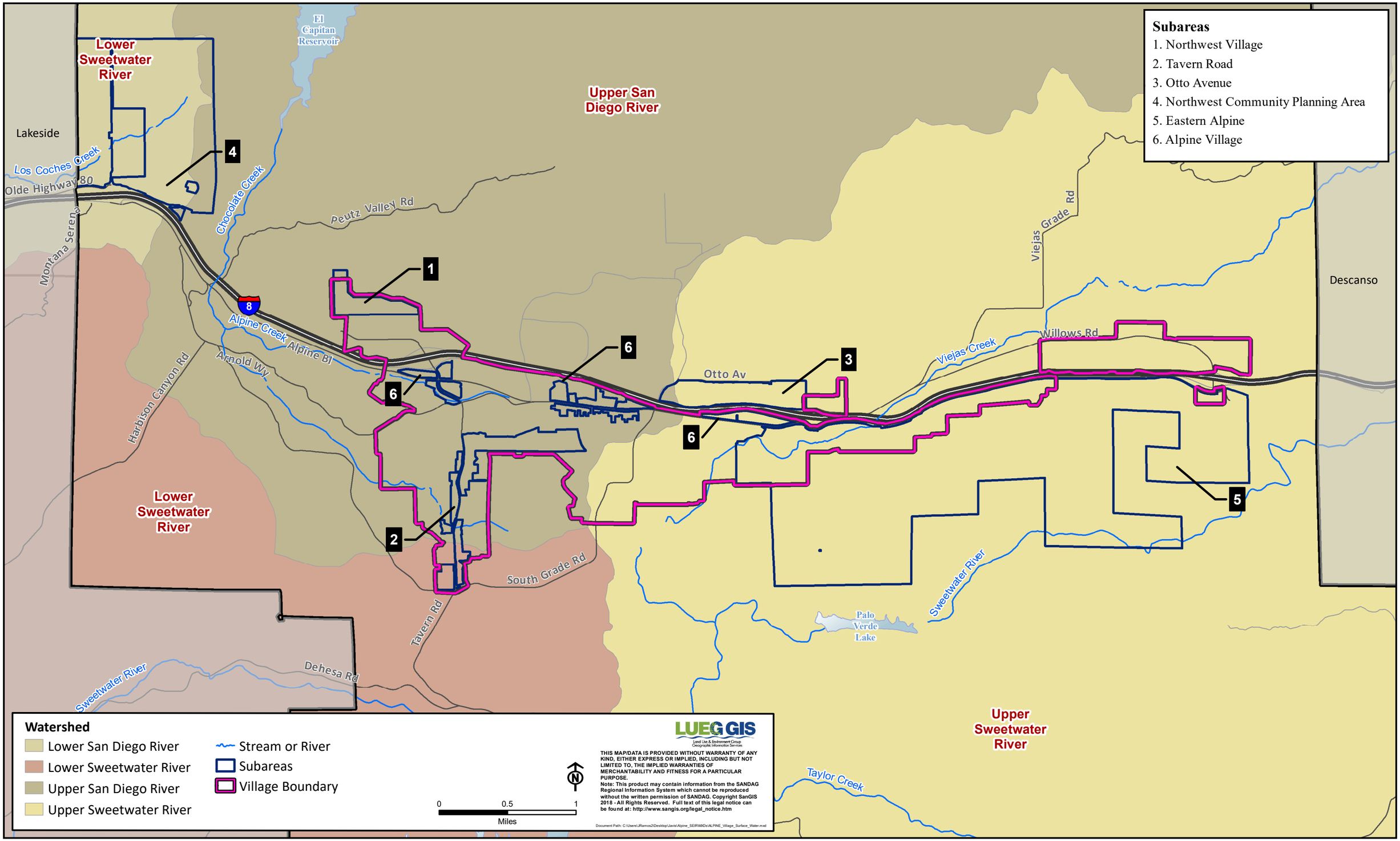
Source: SanGIS, County of San Diego, 2019

Figure 2.8-2a
Potential Impacts from Large Quantity /Clustered Groundwater Users Subareas 1-6



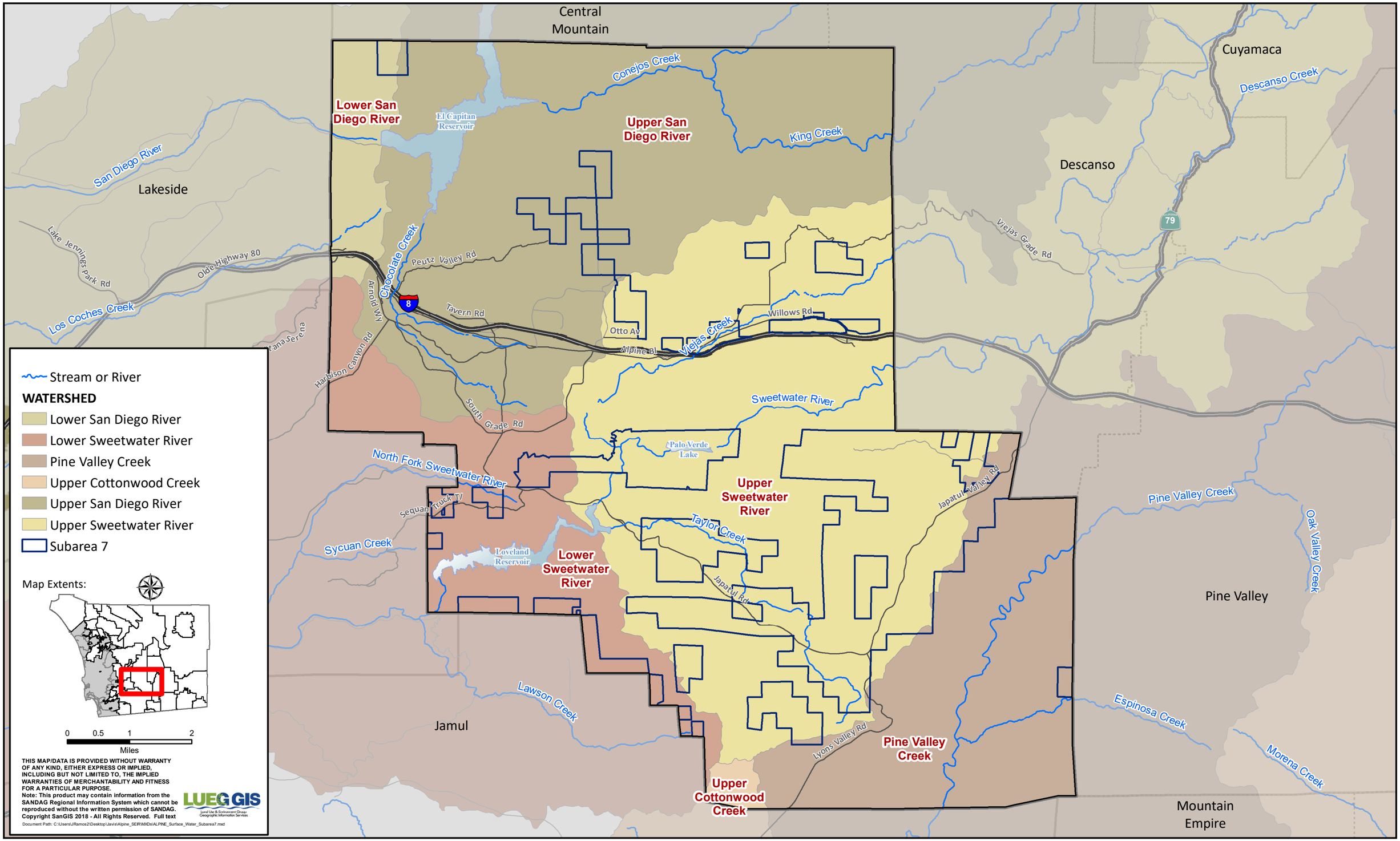
Source: SanGIS, County of San Diego, 2020

Figure 2.8-2b
Potential Impacts from Large Quantity /Clustered Groundwater Users
Subarea 7



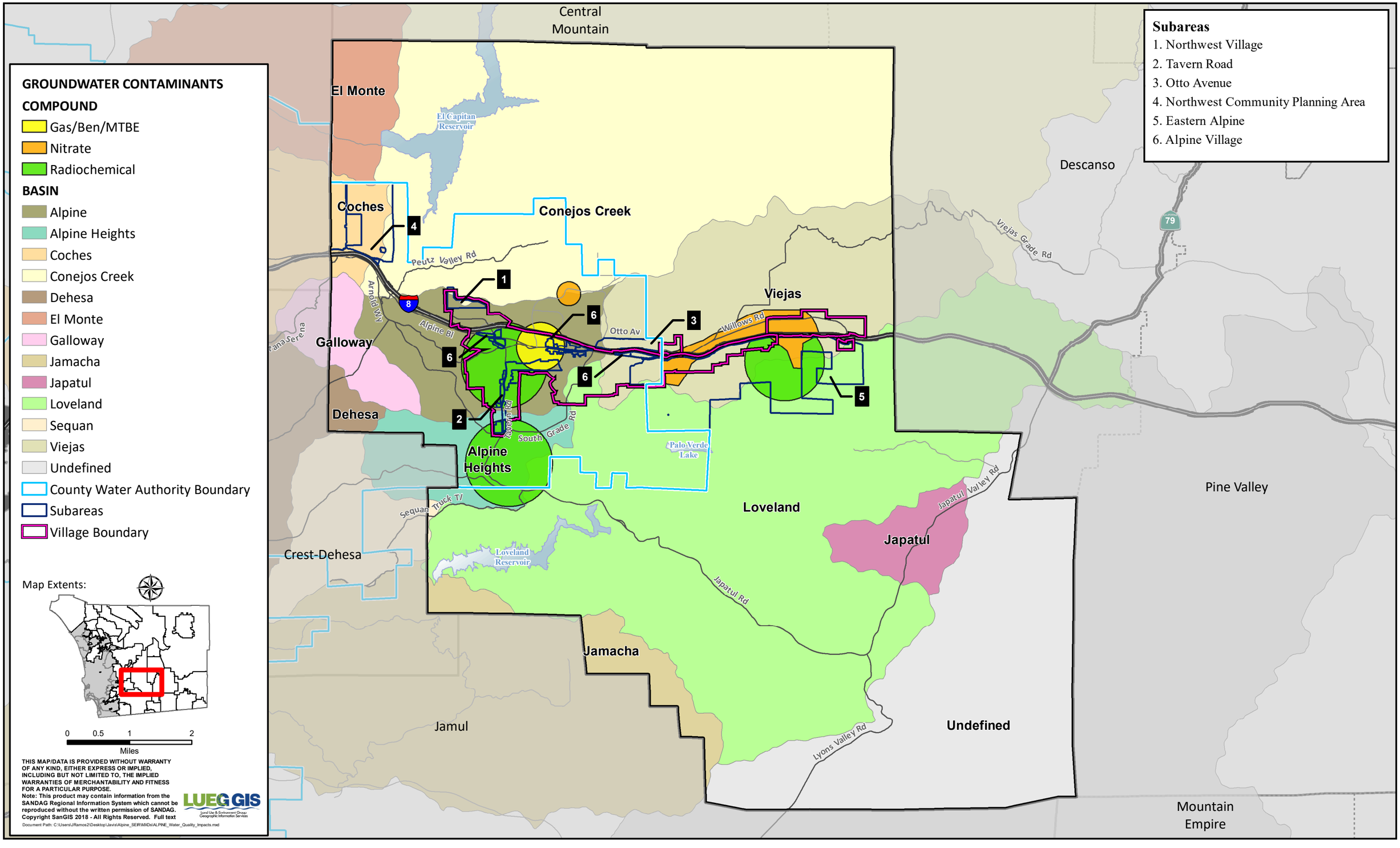
Source: SanGIS, County of San Diego, 2019

Figure 2.8-3a
Surface Water
Subareas 1-6



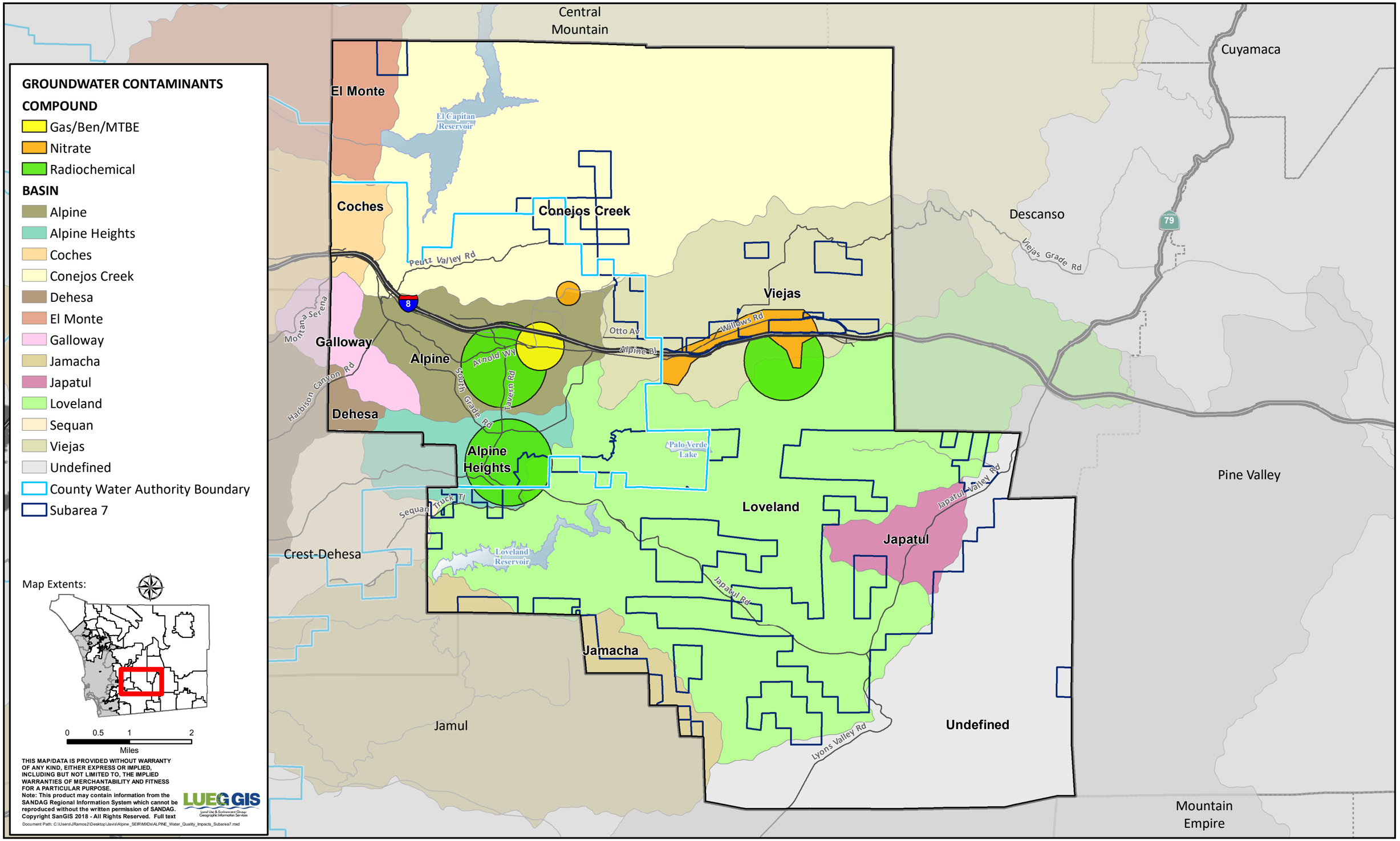
Source: SanGIS, County of San Diego, 2020

Figure 2.8-3b
Surface Water
Subarea 7



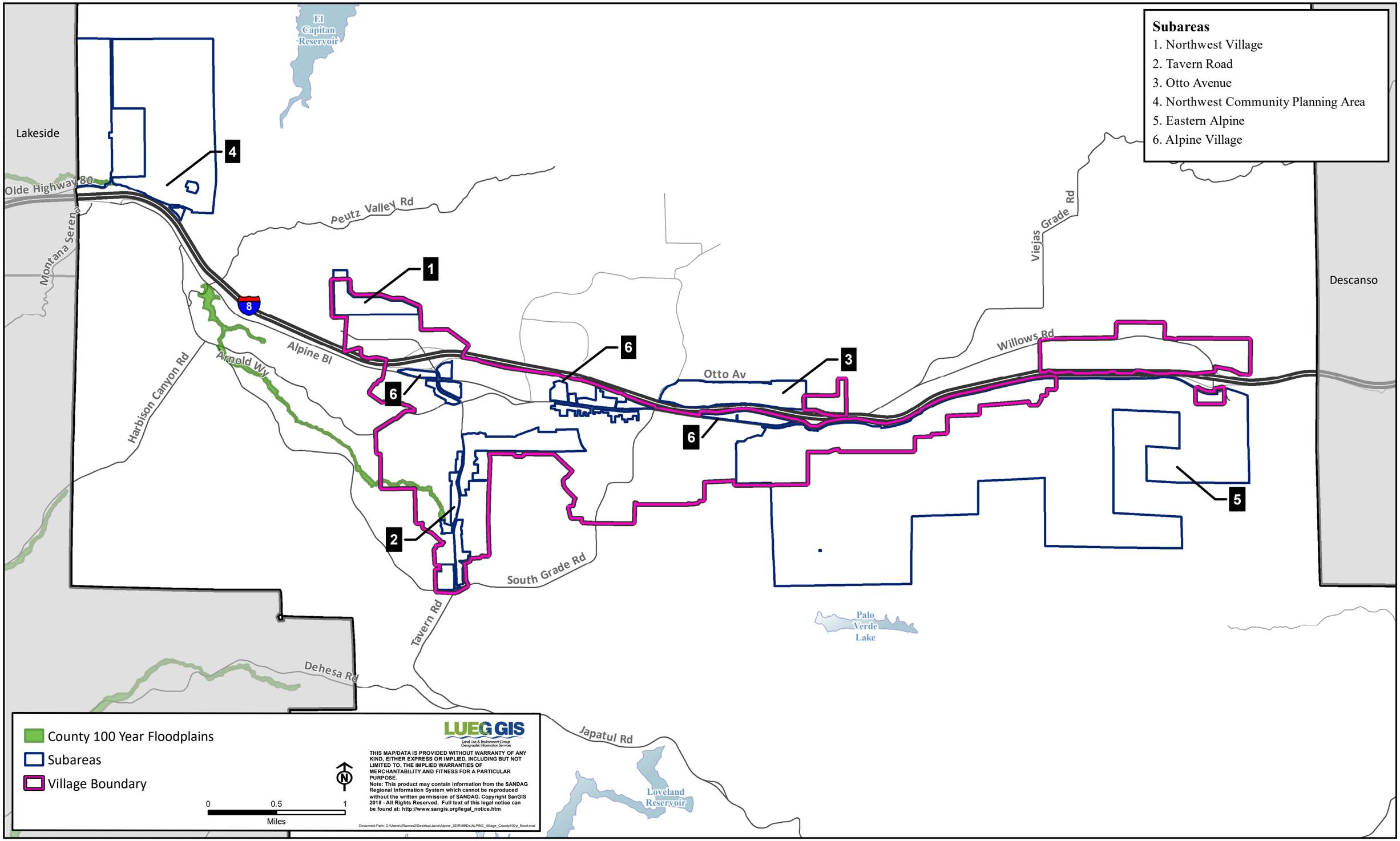
Source: SanGIS, County of San Diego, 2019

Figure 2.8-4a
Groundwater Impacts
Subareas 1-6



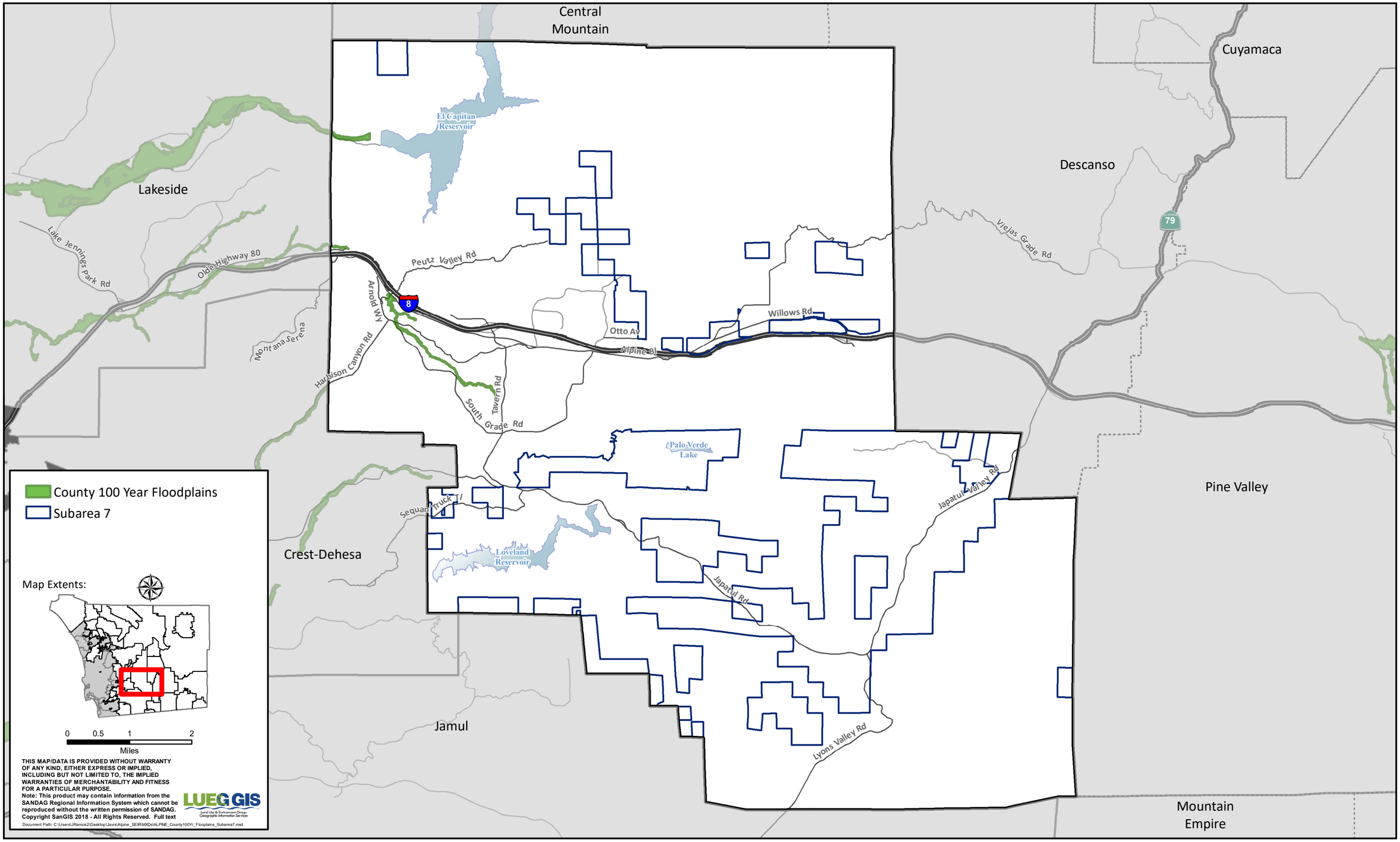
Source: SanGIS, County of San Diego, 2020

Figure 2.8-4b
Groundwater Impacts
Subarea 7



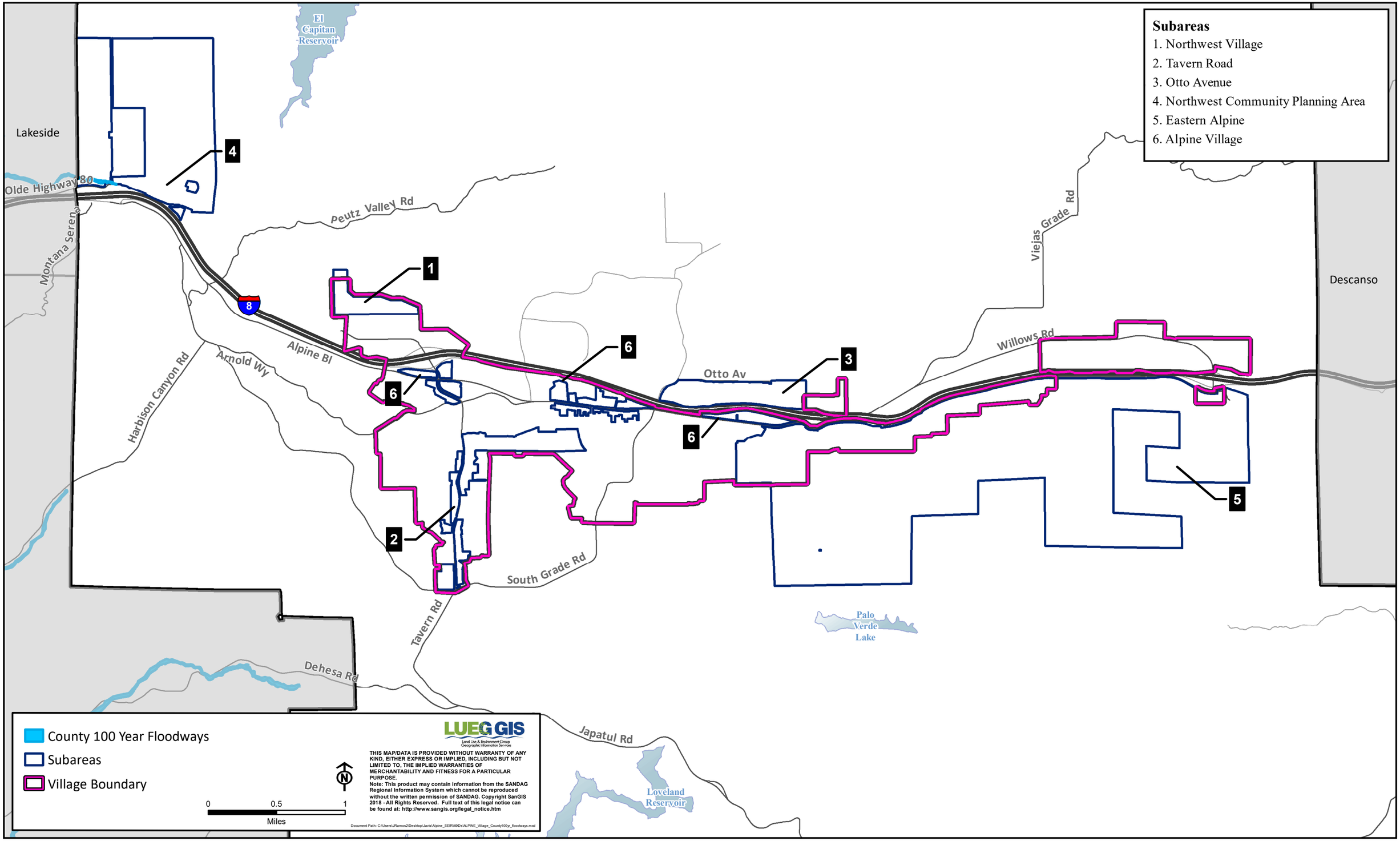
Source: SanGIS, County of San Diego, 2020

Figure 2.8-5a
County 100 Year Floodplains
Subareas 1-6



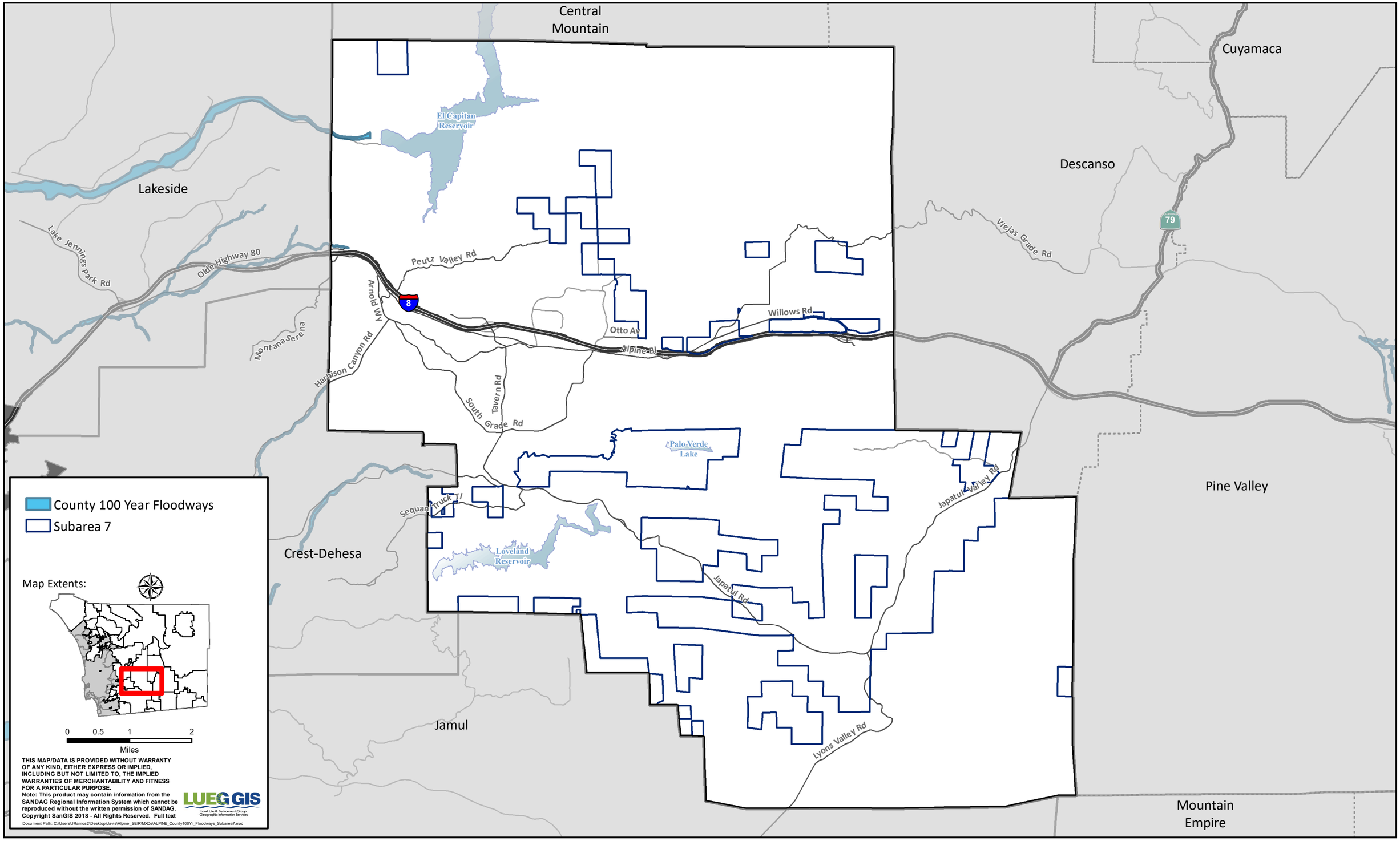
Source: SanGIS, County of San Diego, 2020

Figure 2.8-5b
County 100 Year Floodplains
Subarea 7



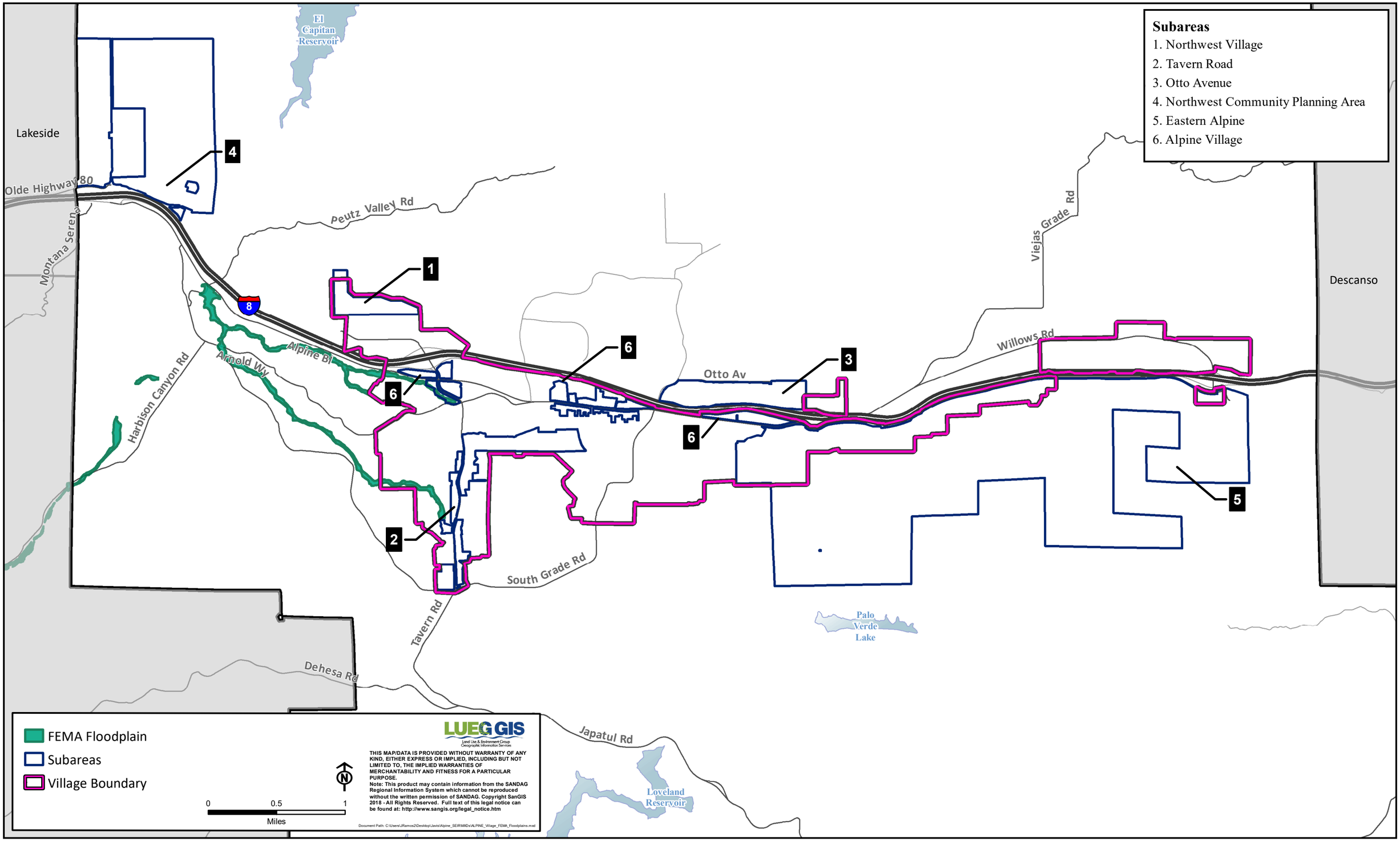
Source: SanGIS, County of San Diego, 2020

Figure 2.8-6a
County 100 Year Floodways
Subareas 1-6



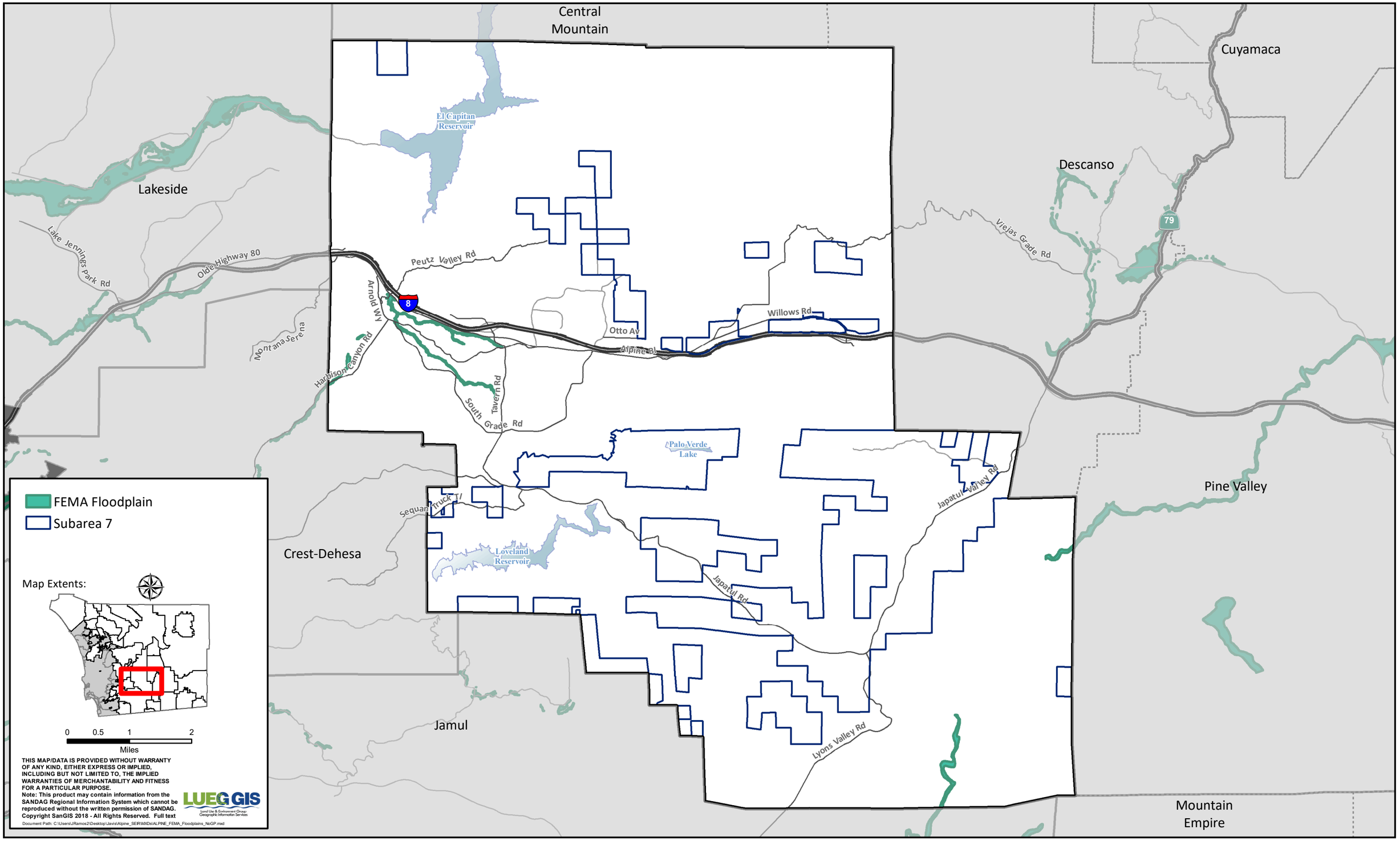
Source: SanGIS, County of San Diego, 2020

Figure 2.8-6b
County 100 Year Floodways
Subarea 7



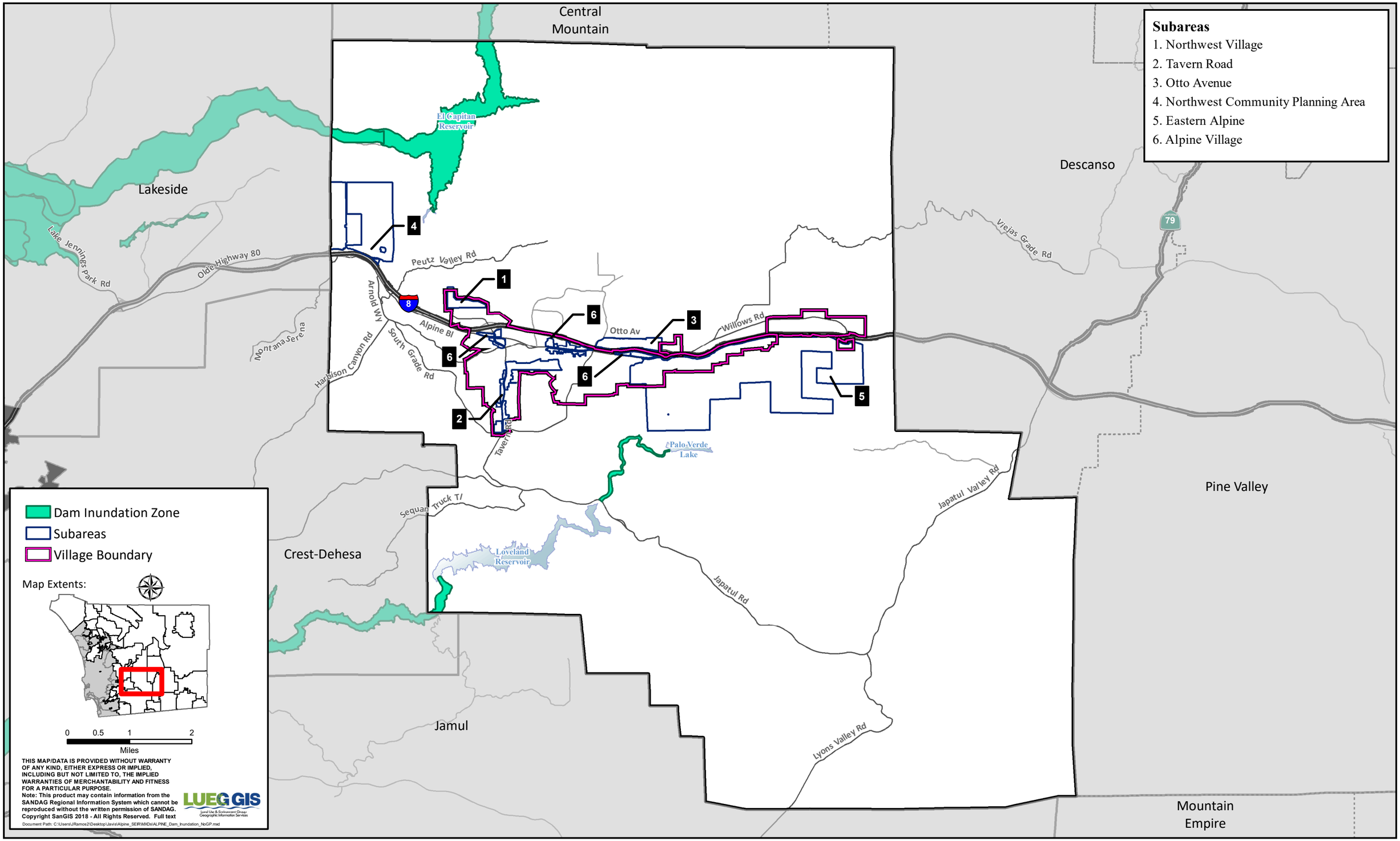
Source: SanGIS, County of San Diego, 2020

Figure 2.8-7a
FEMA Floodplains
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.8-7b
FEMA Floodplains
Subarea 7



Source: SanGIS, County of San Diego, 2019

Figure 2.8-8a
Dam Inundation
Subareas 1-6

Central Mountain
Cuyamaca
Descanso
Pine Valley
Lakeside
Crest-Dehesa
Jamul
Mountain Empire
El Capitan Reservoir
Lake Jennings Park Rd
Olde Highway 80
Peutz Valley Rd
Arnold Wy
Harbison Canyon Rd
Montana Serena
Tavern Rd
South Grade Rd
Otto Av
Alpine Bl
Willows Rd
Viejas Grade Rd
79
8
Palo Verde Lake
Loveland Reservoir
Sequan
Truck Tr
Japatul Valley Rd
Japatul Rd
Lyons Valley Rd

Dam Inundation Zone
Subarea 7

Map Extents:

0 0.5 1 2
Miles

LUEG GIS
Land Use & Environment Group Geographic Information Services

Document Path: C:\Users\JRamos2\Desktop\Jarvis\Alpine_SER\MXDs\ALPINE_Dam_Inundation_Subarea7.mxd

Source: SanGIS, County of San Diego, 2020

Figure 2.8-8b
Dam Inundation
Subarea 7

2.9 Mineral Resources

This section describes the existing mineral resources present in the Alpine Community Plan Area (CPA), the applicable regulations governing mineral resources, and an analysis of potential changes to these resources that may result from implementation of the proposed project.

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this Supplemental Environmental Impact Report (SEIR) provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to Mineral Resources. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs because the type and location of mineral resources have not changed significantly since those documents were prepared. However, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

Table 2.9-1 summarizes the impact conclusions identified in this section.

Table 2.9-1. Mineral Resources Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
MIN-1	Mineral Resource Availability	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
MIN-2	Mineral Resource Recovery Sites Loss	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable

One comment received in response to the Notice of Preparation related to mineral resources concerned the potential effect of extraction sites on biological habitat. Because the proposed project does not propose mineral extraction sites, the potential environmental impacts related to mineral extraction are not analyzed in this section. An analysis of the proposed project's impacts on biological habitat is provided in Section 2.4, *Biological Resources*.

2.9.1 Existing Conditions

Background information on the existing type and location of mineral resources found in the County of San Diego is included in Sections 2.9.1 of the 2011 General Plan EIR and 2.9.1 of the FCI EIR and is incorporated here by reference.

The following discussion is focused on existing conditions within the Alpine CPA and is based primarily on information contained within the prior EIRs, as well as records from the County of San Diego's Department of Planning & Development Services and the California Department of Conservation.

2.9.1.1 Existing Resources

The term *mineral resources* is used in the mining and conservation fields to describe a concentration or occurrence of natural, solid, inorganic, or fossilized organic material in or on Earth's crust in such a form and quantity and of such a quality that it has reasonable prospects for economically viable extraction (County of San Diego 2011a). For purposes of this document, three general categories of mineral resources are important to the County of San Diego:

- **Construction materials –** sand, gravel, and crushed rock. This is economically the most important category of mineral resources.
- **Industrial and chemical mineral materials –** limestone, dolomite, and marble (except where used as construction aggregate); specialty sands, clays, phosphate, borates and gypsum, feldspar, talc, building stone, and dimension stone.
- **Metallic and rare minerals –** precious metals (gold, silver, platinum), iron and other ferro-alloy metals, copper, lead, zinc, gemstones and semi-precious materials, and optical-grade calcite.

These three general categories of mineral resources are discussed further below. The locations of the existing mineral resources in the Alpine CPA are shown in Figure 2.9-1a. There are eight mineral deposits in the Alpine CPA, one of which is in Subarea 4 and three of which are in Subarea 7 (Figure 2.9-1b). There are four identified gold or silver deposits, one of which is in Subarea 1. There is one sand and gravel deposit, but it is not located within a subarea.

The General Plan and FCI GPA do not identify any specific mineral resource designated areas or uses. Rather, they specify land use designations where mineral resource extraction can occur if a major use permit is obtained. This includes the land use categories of Rural Lands, Open Space (Conservation), Public Agency Lands, or Semi-Rural Residential.

2.9.1.2 Construction Materials

Sand, gravel, and crushed rock provide essential construction aggregate material for modern society and comprise the most important mineral resource category in San Diego County. Aggregate is used in one form or another for the construction of roads, parking lots, buildings, homes, schools, hospitals, shopping centers, and other essential infrastructure. In the natural state, sand and gravel are usually loose, easily handled, and readily compacted, while retaining good internal drainage characteristics. These characteristics make them a preferred material for fills and a base for pavements and other structures. When combined with a cement binder, they become the principal ingredient in concrete, whether used in its fresh (plastic) state and placed in forms, or pre-cast as pipe, block, and other structural components. When combined with asphalt, sand and gravel become the aggregate forming the major element of asphaltic concrete, which is widely used as a paving material. The highest-grade aggregate is used to provide the bulk and strength to Portland Concrete Cement and Asphalt Cement. There is one deposit of sand and gravel (Figure 2.9-1a) identified in the central portion of the Alpine CPA; however, it is not in a subarea.

2.9.1.3 Industrial and Chemical Mineral Materials

Industrial and chemical mineral materials found within San Diego County include, but are not limited to, ash, boron, clay, bentonite, kaolinite, dolomite, feldspar, graphite, gypsum, mica, perlite, phosphorous, pumice, quartz, specialty sands, sodium, gypsum, calcite, silica, limestone, and dimension stone. Dimension stone consists of large, round, relatively flawless blocks or slabs of stone used for items such

as buildings, monuments, paving, and countertops. In San Diego County, dimension stone of granite, gabbro, marble, and limestone are quarried. Gypsum is a major rock-forming mineral that produces massive beds, usually from precipitation, out of highly saline waters. Gypsum deposits are located in the eastern part of the County. Moreover, gypsum is used in concrete for highways, bridges, buildings, and many other structures.

Gypsum also is used extensively as a soil conditioner to improve the workability and the water penetration of soils and to overcome the corrosive effect of alkalinity. It is also a component of plaster of Paris used in surgical and orthopedic casts.

Most of the unincorporated County, especially east of the urbanized areas, is underlain by granitic rocks. Granite is one of the most versatile stone types because it is capable of taking a wide variety of finishes, which allows designers to custom-tailor the stone to specific aesthetic or performance requirements. Composed mostly of quartz and feldspars, granite is scratch resistant and durable. Granite is a choice material for high precision applications such as surface plates, and machine mounts and press rolls. There are no industrial or chemical minerals identified within the Alpine CPA.

2.9.1.4 Metallic and Rare Minerals

No gold and only a few gemstone mines are currently active in the County, but each has played a very important historic role in the settlement of several towns largely in the backcountry of eastern San Diego County. Historical mining sites are important for their scientific, educational, and recreation uses. In addition, some historical mines may still contain resources of commercial value. No metallic or gemstone mines are currently located within the Alpine CPA.

2.9.1.5 Geologic Environments

Geologic processes in San Diego County, such as intrusive emplacement of magma, volcanism, erosion, sedimentation, and hydrothermal processes, determine the type, location, and concentration of all mineral resources. The following general geologic environments created from these various geologic processes are the most important to mineral resources that are found within the County. As identified in Figures 2.9-2a and 2.9-2b, the following geologic environments underlie the Alpine CPA.

- **Quaternary alluvium** – Sand and gravel can easily be mined and processed for construction materials from this geologic environment.
- **Tertiary Age sedimentary rocks –** Conglomerate and other sedimentary rock types can be quarried for construction materials from this geologic environment.
- **Cretaceous Age crystalline rocks and Upper Jurassic metavolcanics –** Granitic rocks and other rock types can be quarried for coarse aggregates that are needed for concrete, riprap (broken rock) for breakwaters and bank protection, as well as decorative and dimension stone from this geologic environment.

The majority of the Alpine CPA is underlain by Cretaceous crystalline rocks and Upper Jurassic metavolcanics, with a pocket of quaternary alluvium in the eastern portion of the Alpine CPA, but quaternary alluvium does not underlie any of the subareas. Tertiary sedimentary deposits underlie a small area beneath Subarea 2.

2.9.1.6 Mineral Resource Zones

In 1975, the California Surface Mining and Reclamation Act (SMARA) required the classification of land into Mineral Resource Zones (MRZs) according to the land's known or inferred mineral resource potential. The primary goal of land classification was to provide local government decision makers information regarding the mineral potential of land before they make land use decisions that may preclude mining.

The State Mining and Geology Board prioritizes areas to be classified and/or designated. The highest priority areas are those within the state subject to urban expansion or other irreversible land uses that would preclude mineral extraction. In 1982, western San Diego County was classified into distinct MRZs according to the California Mineral Land Classification System. This area is referred to as the Western San Diego County Production-Consumption (P-C) Zone. The MRZs are described below and shown in Figures 2.9-3a and 2.9-3b. A portion of the western half of the Alpine CPA has been classified as distinct MRZs, and the remaining portion of the Alpine CPA is outside the P-C Zone.

Mineral Resource Zone 1

MRZ-1 designates areas where adequate geologic information indicates no significant mineral deposits are present, or where it is judged there is little likelihood of their presence. This zone is applied by the California Geologic Survey (CGS) to lands where well-developed lines of reasoning, based on economic-geologic principles and adequate data, indicate that the likelihood for occurrence of significant mineral deposits is little to none. MRZ-1 is not present within the area of the Alpine CPA that has been classified.

Mineral Resource Zone 2

MRZ-2 designates areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. A typical MRZ-2 area would include an operating mine, or an area where extensive sampling has indicated the presence of a significant mineral deposit. A total of 0.40 acre of MRZ-2 has been categorized on the northwestern boundary of the Alpine CPA. However, there are no MRZ-2 areas within any of the subareas.

Mineral Resource Zone 3

MRZ-3 areas contain known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification of specific localities into the MRZ-2 category. Most of the rest of the land in the Western San Diego P-C Zone is MRZ-3, except a few small areas that are MRZ-4. The northwestern portion of the Alpine CPA, which includes Subareas 1, 2, 4, 6, portions of Subarea 7 (Figure 2.9-3b), and the majority of Subarea 3, is classified as MRZ-3 and shown in Figure 2.9-3a.

Mineral Resource Zone 4

MRZ-4 areas are those where geologic information does not rule out the presence or absence of mineral resources. The distinction between the MRZ-1 and MRZ-4 categories is important for land-use considerations. The MRZ-4 classification does not imply there is little likelihood for the presence of mineral resources but rather there is a lack of knowledge regarding mineral occurrence. Further exploration could result in the reclassification of MRZ-4 lands. There are no MRZ-4 areas within the Alpine CPA.

Uncategorized Zones

Uncategorized zones are all the lands outside the Western San Diego County P-C Zone. The majority of the Alpine CPA is in this zone, including most of Subarea 5 and portions of Subarea 7.

2.9.1.7 Mining Operations in the Alpine Community Plan Area

The County of San Diego has land use authority over surface mines, while federal agencies have jurisdiction over all underground mines. Two surface mines have been mapped in the Alpine CPA, the Turvey Pit and the Palo Verde Lake Pit (see Figures 2.9-4a and 2.9-4b). The Turvey Pit is an active surface mine located at the interchange of Interstate (I-) 8 and Dunbar Lane. The Palo Verde Lake Pit is a closed mining operation that was permitted in 1985 for a 1- to 3-year restoration project for Palo Verde Lake.

2.9.2 Regulatory Framework

Sections 2.9.2 of the 2011 General Plan EIR and 2.9.2 of the FCI EIR included a discussion of the regulatory framework related to mineral resources in the unincorporated County. These regulations identified in the prior EIRs were reviewed to ensure they are still valid today and are incorporated by reference herein and listed below. See the 2011 General Plan EIR Section 2.9, Mineral Resources and FCI EIR Section 2.9, Mineral Resources, for a more detailed discussion of each. There are no federal regulations, authorities, or administering agencies pertaining to mineral resources that regulate the proposed project.

Applicable state regulations include:

- SMARA of 1975
- Integrated Waste Management Act.

Applicable local regulations include:

- The County of San Diego's Zoning Ordinance, Sections 2820–2835, S82 Extractive Use Regulations
- The County of San Diego's Zoning Ordinance, Sections 6550–6556, Extractive Use Regulations
- County of San Diego Code of Regulatory Ordinances Section 87.701–87.714, Surface Mining.

2.9.2.1 County of San Diego General Plan Policies

There are specific General Plan policies and goals found in the Conservation and Open Space Element intended to address mineral resources. These policies are summarized below and included in Appendix C for reference.

Conservation and Open Space Element

Goal COS-10 is to ensure the long-term production of mineral materials is adequate to meet the local County average annual demand while maintaining reserves to a 50-year supply and using operational techniques and site reclamation methods consistent with SMARA to minimize adverse effects. This is accomplished by policies COS-10.1 through COS-10.9, which encourage the conservation of areas designated as having substantial potential for mineral extraction, discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. In addition, these policies prohibit development from restricting road access to existing mining facilities, areas classified MRZ-2 or MRZ-3 by the State Geologist, or areas identified in the County Zoning Ordinance for potential extractive use, discourage the development of land uses that are not compatible with the retention of mining or recreational access to non-aggregate mineral

deposits, encourage the continued operation of existing mining facilities, develop specific permit types and procedures for the authorization of new mining facilities, and provide zoning overlays for MRZ-2 designated lands and a 1,300-foot-wide buffer area adjacent to such lands. These policies are further described in the General Plan.

2.9.2.2 Alpine CPU Policies

There is a specific goal found in the Conservation element of the proposed project intended to protect mineral resources as described below:

Conservation and Open Space Element

Goal COS-1 is to promote the well-planned management of all valuable resources, natural and man-made, and prevent the destruction and wasteful exploitation of natural resources where feasible.

2.9.3 Analysis of Project Effects and Determination as to Significance

Based Appendix G of the State CEQA Guidelines and the County Guidelines for Determining Significance – Mineral Resources (County of San Diego 2008), the proposed project would result in a significant impact if it would:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

2.9.3.1 Issue 1: Mineral Resource Availability

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and the County Guidelines for Determining Significance - Mineral Resources, implementation of the proposed project would have a significant impact if it would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, such as proposing incompatible development:

- On or within the vicinity (generally up to 1,300 feet from the site) of an area classified as MRZ-2;
- On land classified as MRZ-3;
- On land underlain by Quaternary alluvium, or
- On or within the vicinity of areas containing industrial material and gemstone resources.

Impact Analysis

The prior EIRs determined that the development proposed as part of the 2011 General Plan and FCI GPA would result in incompatible uses in areas of known mineral resources. Such incompatible uses would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of the state. The discussion of impacts related to the loss of available mineral resources from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.9 and 2.9 of the 2011 General Plan EIR and FCI EIR, respectively, and is incorporated by reference.

In addition, the prior EIRs determined that implementation of the 2011 General Plan and FCI GPA would potentially contribute to cumulative impacts associated with the loss of available mineral resources. Compliance with regulations and implementation of the proposed General Plan policies and the prior EIRs mitigation measures would reduce the 2011 General Plan and FCI GPA's direct and cumulative impacts by identifying mineral resources and providing specific guidelines for the permitting process in the Zoning Ordinance, which would facilitate that mineral resources are taken into account during planning and development. However, although General Plan policies and the prior EIRs mitigation measures would reduce the 2011 General Plan and FCI GPA's direct and cumulative impacts to the extent feasible, impacts associated with the loss of available mineral resources were concluded to remain significant and unavoidable.

A potential adverse effect of the proposed project could be the development of incompatible land uses that either directly or indirectly make a mineral resource inaccessible for future extraction. Development of residences, infrastructure, or other buildings directly above the mineral resource could make a resource inaccessible for future extraction. Development adjacent to an identified mineral resource may indirectly make the resource inaccessible in the future because mining operations require adequate setbacks from incompatible land uses due to the potential environmental issues associated with mining, including noise, traffic, air quality, and visual impacts and there may not be ways to extract the resource through discreet subterranean means.

As shown on Figure 2.9-3a, there are 12,745 acres of land classified as MRZ-3 in the Alpine CPA. All of Subareas 1, 2, 4, 6, 7, the majority of Subarea 3, and a small portion of Subarea 5 are located on land classified as MRZ-3. None of the subareas are located on land classified as MRZ-2, or within 1,300 feet from MRZ-2 lands. Approximately 0.40 acre of the Alpine CPA is classified as MRZ-2, in the northwest portion of the Alpine CPA, north of Subarea 4. In addition, based on the United States Department of the Interior Geological Survey, there is record that granite has been identified within the Alpine CPA (USGS 1980). Granite is considered a valuable mineral resource because it can be mined for different valuable mineral materials. The proposed project includes land use changes to four of the seven subareas and mobility network changes; however, density increases would only be allowed in three of the subareas (Subareas 2, 4, and 6). The potential impacts to those subareas, and the density decrease in Subarea 5, are discussed in more detail below.

Subarea 2

Subarea 2 is made up of several disconnected areas, all of which are on lands classified as MRZ-3. The majority of Subarea 2 is underlain by Tertiary sedimentary deposits, with a small portion in the northeast and southwest sections of the subarea underlain by Cretaceous crystalline rocks and Upper Jurassic metavolcanics. The land use designation changes would involve changing existing Village Residential (VR-4.3, VR-2.9, VR-2) land uses to a higher density (VR-10.9, VR-7.3) and reclassifying a small area from Village Residential to Semi-Rural Residential (SR-1) or Neighborhood Commercial (C-3). These land use designations would result in denser residential development if completely built out and have the potential to result in up to 1,095 residential units compared to 315 residential units that would be allowed under buildout of the current General Plan land use designations. This increase in density has the potential to prevent future mineral resource extraction in lands classified as MRZ-3. Therefore, the proposed project could make lands inaccessible to future mining that may have otherwise been available.

Subarea 4

Subarea 4 is on lands classified as MRZ-3 and underlain by Cretaceous crystalline rocks and Upper Jurassic metavolcanics. A mineral deposit is in the southern portion of Subarea 4. The proposed project would

include re-designation of existing Semi-Rural Residential (SR-1, SR-2) to uniformly SR-0.5 land use designations. The addition of the Village Core Mixed Use (VCMU) and Neighborhood Commercial (C-3) near the intersection of Dunbar Lane and Chocolate Summit Drive would introduce local services to this subarea. The higher density residential land use designation has the potential to result in up to 851 residential units compared to 166 residential units that would be allowed under buildout of the current General Plan land use designations. Therefore, the proposed project could make lands inaccessible to future mining that would have otherwise been available.

Subarea 5

The far western portion of Subarea 5 is located on lands classified as MRZ-3, underlain by Cretaceous crystalline rocks and Upper Jurassic metavolcanics, and does not have mineral deposits or active mines present. The majority of Subarea 5 is located on Uncategorized Zones, as shown on Figure 2.9-3a. This means the land has not been classified, and it is unknown whether mineral resources are present in the area.

The proposed project would result in 429 dwelling units (a reduction of 31 units compared to the current General Plan) and 10.96 acres of commercial land uses (an increase of 3.94 acres in commercial land uses) as well as mobility network changes. While this results in slightly lower density than the current General Plan, the commercial intensity would increase, and overall development would intensify compared to the current General Plan.

Subarea 6

Subarea 6, known as the Alpine Village, is located entirely on lands classified as MRZ-3, underlain by Cretaceous crystalline rocks and Upper Jurassic metavolcanics, and does not have mineral deposits or active mines present. The proposed project would change the existing land use designations of Residential Commercial (RC) to VCMU to provide additional high-density residential options and flexibility in commercial options. The proposed project has the potential to result in up to 617 residential units compared to 38 residential units that would be allowed under buildout of the current General Plan Land Use designation. This increase in density has the potential to prevent future mineral resource extraction in lands classified as MRZ-3. Therefore, the proposed project could potentially make lands inaccessible to future mining that would have otherwise been available; however, Subarea 6 is located along Alpine Boulevard, and contains most of the community's existing and planned retail and commercial services. Of the approximately 105 acres within the subarea, only 18 percent of the land is considered developable and available for future mining operations.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.9.2, various regulations are in place to protect mineral resources in the County that are also applicable to the proposed project. Compliance with these applicable regulations, such as the SMARA, which establishes policies for conservation and development of mineral containing lands and requires all cities and counties to incorporate the mapped MRZs into their general plans; and Sections 2820 through 2825 of the County of San Diego Zoning Ordinance, which preserves areas with valuable mineral deposits until the deposits can be extracted and identifies zones within the County where mining and quarrying uses are permitted, could help to reduce impacts associated with the loss of available mineral resources. However, these regulations are primarily intended to protect existing extraction sites or known mineral resource deposits and they would not help to reduce potential impacts of previously unknown mineral resources, such as resources in areas designated as MRZ-3.

The 2011 General Plan and FCI GPA include several policies within the Conservation and Open Space Element reducing the potential of the proposed project to limit the availability of mineral resources, because the policies are intended to discourage incompatible land uses and reduce encroachment of urbanization on aggregate resource extraction. These include policies COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9, which are presented above in Section 2.9.2.

In addition, the prior EIRs identified one mitigation measure addressing impacts related to mineral resource availability that would be applicable to the proposed project, Min-1.1, which is provided in Sections 2.9.6 of the 2011 General Plan EIR and 2.9.4 of the FCI EIR.

Summary

The proposed project would include land use designation changes to Subareas 2, 4, and 6 in areas designated as MRZ-3, and allow a density of development and mobility network changes incompatible with future mining operations. The remaining portions of the Alpine CPA outside of the subareas would not experience land use designation changes and would still be available for potential mineral extraction if mineral resources are identified. However, because land that could contain mineral resources would have land use designations that would prevent mineral extraction that would have been available under the existing land use designations, there would be a potentially significant impact. The prior EIRs also identified a significant impact related to availability of mineral resources; however because the proposed project would result in additional development densities than analyzed in the prior EIRs, there would be a **potentially significant** impact and it would be more severe compared to the prior EIRs (Impact-MIN-1).

2.9.3.2 Issue 2: Mineral Resource Recovery Site Loss

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Resource recovery sites are areas where mineral resources could be extracted for use. Locally important resource recovery sites or areas where important resource recovery sites could potentially be located are designated by the CGS as MRZ-2 or MRZ-3, or as being underlain by Quaternary alluvium.

Impact Analysis

The prior EIRs do not identify specific mineral resource recovery sites but they determined that the General Plan allows land uses incompatible with mining and resource recovery operations in areas designated as MRZ-2 or MRZ-3 and areas underlain by Quaternary alluvium, that contain, or potentially contain, important aggregate resources. The discussion of impacts related to mineral resource recovery sites from implementation of the 2011 General Plan and FCI GPA are provided in Sections 2.9 of the 2011 General Plan EIR and 2.9 of the FCI EIR and are incorporated by reference.

The prior EIRs determined General Plan policies and mitigation measures would reduce potential impacts on mineral resources because they would facilitate the identification of mineral resources in the Zoning Ordinance, discourage incompatible uses, and provide specific permitting guidelines for extraction sites, and provide guidance for the consideration of mineral resources during planning and development. Although compliance with regulations and implementation of the proposed General Plan policies and mitigation measure would reduce the 2011 General Plan and FCI GPA's direct and cumulative impacts to the extent feasible, the prior EIRs determined that impacts associated with the loss of available mineral resources recovery sites would remain significant and unavoidable.

The Turvey Pit, located just southeast of the interchange of I-8 and Dunbar Lane, is the only active mining operation within the Alpine CPA. The Turvey Pit is not within a subarea, so the land use designations would not be changed at, or adjacent to, the Turvey Pit mine. Thus, the proposed project would not introduce any incompatible uses near any existing, active resource recovery sites.

The proposed project would, however, introduce incompatible uses to land within the Alpine CPA mapped by the CGS as MRZ-3, as discussed under Issue 1 above. Land designated as MRZ-3 is considered a locally important resource recovery site by the County. As described in Section 2.9.1.1, *Existing Resources*, known isolated deposits also exist within two subareas that have proposed land use changes: Subarea 1 contains a deposit of silver and/or gold, and Subarea 4 contains a deposit of mineral resources. No additional residential units would result from implementation of the proposed project in Subareas 1, 3, and 7, as compared to buildout under the current General Plan land use designations, and therefore proposed land use designations would not result in further impacts related to access to the known silver and/or gold deposit.

Subarea 4 would have an increase in density through the re-designation of existing Semi-Rural Residential (SR-1, SR-2) to uniformly SR-0.5 land use designations. The addition of the Village Core Mixed Use (VCMU) and Neighborhood Commercial (C-3) near the intersection of Dunbar Lane and Chocolate Summit Drive will introduce local services to this subarea, and the higher density residential land use designation has the potential to result in up to 851 residential units compared to 166 residential units that would be allowed under buildout of the current General Plan land use designations, which could introduce new incompatible land uses to Subarea 4.

Quaternary alluvium, which is also considered a locally important resource recovery site, does not underlay any subareas in the Alpine CPA. However, because the proposed project would introduce incompatible land uses in subareas categorized as MRZ-3, and unclassified lands that may be underlain by granite (USGS 1980), the proposed project would result in potentially significant impacts on mineral resource recovery sites.

Federal, State, and Local Regulations and Existing Regulatory Processes

Existing regulations listed above in Section 2.9.2 are applicable to the proposed project. Compliance with these applicable regulations would reduce impacts associated with the loss of mineral resources recovery sites.

The current General Plan includes several policies within the Conservation and Open Space Element reducing the potential of the proposed project from limiting the availability of mineral resources, because the policies are intended to protect against the loss of mineral resource availability. These include policies COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9, which are presented in Section 2.9.2. In addition, the prior EIRs identified one mitigation measure addressing impacts on mineral resources that would be applicable to the proposed project, Min-1.1, which is provided in Section 2.9.6.

Summary

The proposed project would introduce incompatible land uses in subareas categorized as MRZ-3, and in unclassified lands that may be underlain by granite (USGS 1980), the proposed project would result in **potentially significant** impacts on mineral resource recovery sites. Although compliance with existing regulations and implementation of the current General Plan policies and the mitigation measure would reduce the proposed project's impact associated with the loss of available mineral resources recovery sites to the extent feasible, the proposed project would result in higher development densities than the

2011 General Plan or FCI GPA. As such, the proposed project would result in a more severe impact on mineral resource recovery sites than the impacts determined in the prior EIRs (Impact-MIN-2).

2.9.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for minerals includes the entire Alpine CPA and immediately adjacent areas, depending on the location of mineral deposits or operations.

2.9.4.1 Issue 1: Known Mineral Resource Availability

Construction and operation of cumulative projects in the vicinity of the Alpine CPA and within the San Diego region would have the potential to result in the loss of availability of known mineral resources. Urbanization and development could convert lands containing mineral resources to incompatible land uses, thereby reducing the availability of mineral resources in the region. Additionally, there are other jurisdictions in the vicinity of the Alpine CPA, such as the Viejas Reservation and the United States Forest Service, for which the County does not have oversight. These jurisdictions may propose future projects that could contribute to the loss of mineral resources in the region. It is also possible that reasonably foreseeable projects and community plans in the vicinity of the Alpine CPA would contain measures and policies to protect and preserve mineral resources and would not result in a cumulatively considerable contribution to impacts on mineral resources. However, because the contents of future community plans, or the type or extent of potential development are not currently known, it is possible cumulative growth and development would result in a significant cumulative impact associated with the loss of available mineral resources.

The proposed subsequent development would result in a reasonably foreseeable loss of mineral resources due to the encroachment of incompatible uses on and adjacent to areas of potential mineral resources, which would limit future availability. Specifically, increased density is proposed in areas zoned as MRZ-3, which have the possibility of containing mineral resources. Therefore, the proposed project would also have the potential to reduce availability of mineral resources if it is fully built out. As a result, future impacts under the proposed project would cause more severe impacts related to the loss of available mineral resources compared to the prior EIRs.

Compliance with existing regulations and implementation of the current General Plan policies and the mitigation measure would reduce this impact to the extent feasible for the reasons described above; however, impacts associated with the loss of available mineral resources would remain significant and unavoidable. Because the proposed project would allow for increased development beyond what was anticipated in the prior EIRs, impacts related to the loss of available mineral resources would be more severe than those identified in the prior EIRs and would be considered a **cumulatively considerable impact** associated with the proposed project (Impact-C-MIN-1).

2.9.4.2 Issue 2: Mineral Resource Recovery Site Loss

Construction and operation of cumulative projects near the Alpine CPA and adjacent areas would have the potential to result in the loss of available locally important mineral resources recovery sites. The County has envisioned preparing 15 community plan updates by 2030. These updates could propose increased residential or commercial land use designations, which could further reduce land available for mining. Urbanization and development have the potential to encroach on known or unknown mineral resource deposits in a way that would have the potential to prevent the success of future resource recovery sites. It is also possible reasonably foreseeable community plans in the vicinity of the Alpine CPA would contain policies to protect and preserve mineral resources and would not result in a cumulatively

considerable contribution to impacts on mineral resources. However, because the contents of future community plans, or the type or extent of potential development are not currently known, it is possible cumulative growth and development would result in a significant cumulative impact associated with the loss of mineral resource recovery sites.

The County considers potential impacts to be incompatible uses in the vicinity of locally important resource recovery sites or areas where important resource recovery sites could potentially be located, which are designated by the CGS as MRZ-2 or MRZ-3, or as being underlain by Quaternary alluvium. The proposed project would introduce incompatible uses on land within the Alpine CPA mapped by the CGS as MRZ-3. Future development in these areas would have the potential to encroach on known or unknown mineral resource deposits and potentially prevent the success of future resource recovery sites. As a result, future development under the proposed project would cause more severe impacts related to the loss of available mineral resources recovery sites compared to the prior EIRs. Compliance with existing regulations and the implementation of the current General Plan policies and the mitigation measure would reduce this impact to the extent feasible; however, impacts associated with the loss of locally important resource recovery sites or areas where important resource recovery sites could be located would remain significant and unavoidable. Therefore, the proposed project's contribution to this impact would be **cumulatively considerable** (Impact-C-MIN-2).

2.9.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potentially significant impacts associated with mineral resource availability and mineral resource recovery sites.

Impact-MIN-1: Reduce Mineral Resource Availability. Due to the increase of land uses incompatible with mining operations allowed by the proposed project, the proposed project would result in a more severe potentially significant impact related to reducing mineral resource availability than determined in the prior EIRs. This would be considered a significant impact.

Impact-MIN-2: Preclude Future Mineral Resource Recovery Sites. Due to the higher density development and encroachment of incompatible uses on potential or likely mineral resource deposits in land categorized as MRZ-3, the proposed project would result in more severe impacts on mineral resource recovery sites compared to the prior EIRs. This would be considered a significant impact.

Impact-C-MIN-1: Reduce Mineral Resource Availability. The proposed project, in combination with other growth in the San Diego region, would result in a more severe potentially significant impact related to reducing mineral resource availability than determined in the prior EIRs. Therefore, impacts associated with the loss of available mineral resources would be significant.

Impact-C-MIN-2: Preclude Future Mineral Resource Recovery Sites. The proposed project, in combination with other growth in the San Diego region, would result in more severe impacts on mineral resource recovery sites compared to the prior EIRs. Therefore, impacts associated with mineral resources recovery sites would be significant.

2.9.6 Mitigation

2.9.6.1 Issue 1: Mineral Resource Availability

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In

addition, implementation of the following prior EIRs mitigation measures in combination with the current General Plan policies and compliance with existing regulations would reduce Impact-MIN-1 and Impact-C-MIN-1 but not to a level below significant. These impacts are related to the loss of known mineral resources. However, even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measures were considered in attempting to reduce impacts associated with mineral resources to below a level of significance. However, the County has determined that these measures would be infeasible and therefore these mitigation measures would not be implemented.

- Prohibit incompatible uses that would be located on or near significant mineral sites.

  Explanation: This measure would result in restriction on future development in areas of the CPA identified for increased growth because potentially significant mineral resources sites have the potential to occur in Subareas 2, 4, and 6. Restrictions on the type or amount of development within a community would conflict with areas that may accommodate additional growth. Therefore, this measure would be infeasible because community plans are required to be consistent with the adopted General Plan. The measure would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the proposed project, which is to accommodate a reasonable amount of growth.

- For projects that propose incompatible uses near significant resource sites, require the applicants to mine the site prior to project development.

  Explanation: While the majority of the proposed project is located on lands designated MRZ-3, and could potentially contain mineral resources, the area of known significant mineral resources within the Alpine CPA is not located within one of the subareas identified in the proposed project. It is also not feasible to require property owners to mine their properties prior to development. Therefore, this potential mitigation measure is infeasible.

2011 General Plan and FCI EIR Mitigation Measures

The following mitigation measure is being carried forward and applies to the proposed project: Min-1.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this measure would reduce the proposed project's impacts to mineral resources.

Alpine Community Plan Update Mitigation Measures

No additional feasible mitigation measures are available.

2.9.6.2 Issue 2: Availability of a Mineral Resource Recovery Site Loss

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, implementation of the prior EIRs mitigation measure Min-1, identified for Issue 1 above, in combination with the current General Plan policies and compliance with existing regulations, would reduce Impact-MIN-2 and Impact-MIN-C-2, related to the loss of mineral resource recovery sites but not

to a level below significant. However, even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

2011 General Plan and FCI EIR Mitigation Measures

The following mitigation measure is being carried forward and applies to the proposed project: Min-1.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this measure would reduce the proposed project's impacts to mineral resources.

Alpine Community Plan Update Mitigation Measures

No additional feasible mitigation measures are available.

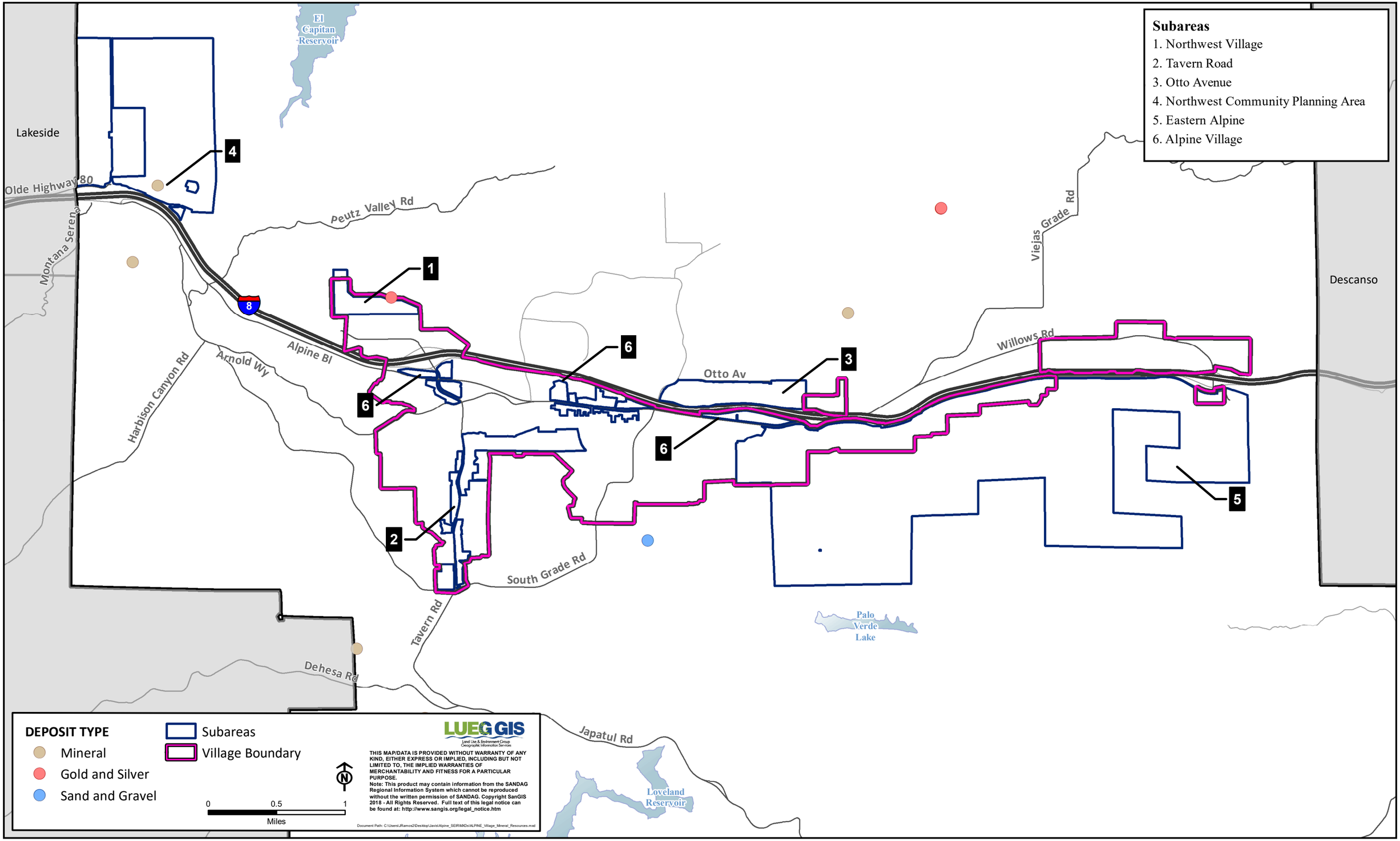
2.9.7 Conclusion

2.9.7.1 Issue 1: Mineral Resource Availability

Implementation of the proposed project would result in potentially significant impacts on the availability of mineral resources because the proposed project would allow for incompatible development within land classified as MRZ-3. This development would include land uses incompatible with mineral resource extraction operations, including high density residential and commercial land uses. Therefore, the proposed project would result in a potentially significant impact associated with the loss of available mineral resources, which would be more severe than impacts identified in the prior EIRs (Impact-MIN-1). Additionally, the proposed project would result in a potentially significant cumulative impact (Impact-C-MIN-1). Current General Plan policies and existing regulations and the prior EIRs mitigation measure would reduce direct impacts associated with the loss of available mineral resources, but not below a level of significance. Direct and cumulative impacts would remain **cumulatively considerable** and **significant and unavoidable**.

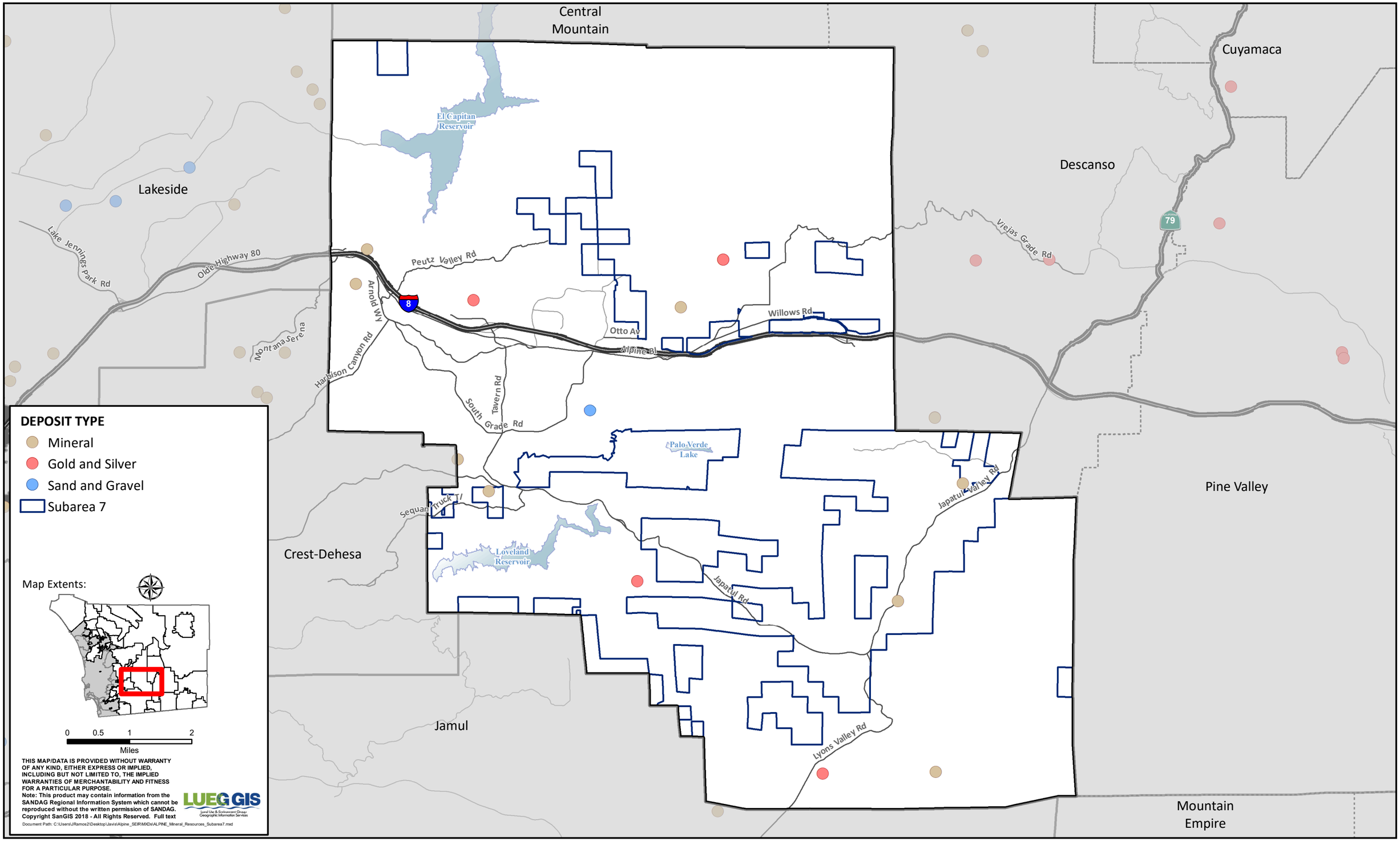
2.9.7.2 Issue 2: Mineral Resource Recovery Site Loss

Implementation of the proposed project would result in potentially significant impacts on the future extraction of aggregate resources because the proposed project would allow for higher-density development in areas of known, or likely, locally important resource recovery sites or areas where important resource recovery sites could potentially be located. This has the potential to allow incompatible land uses to be developed, which would preclude the extraction of mineral resource recovery sites in the Alpine CPA. Therefore, the proposed project would result in a potentially significant impact associated with the loss of available locally important resource recovery sites or areas where important resource recovery sites could potentially be located, which would be more severe than impacts identified in the prior EIRs (Impact-MIN-2). Additionally, the proposed project would result in a potentially significant cumulative impact (Impact-C-MIN-2). Current General Plan policies and existing regulations and the prior EIRs mitigation measure would reduce direct impacts associated with the loss of available mineral resources recovery sites, but not below a level of significance. Direct and cumulative impacts would remain **cumulatively considerable** and **significant and unavoidable**.



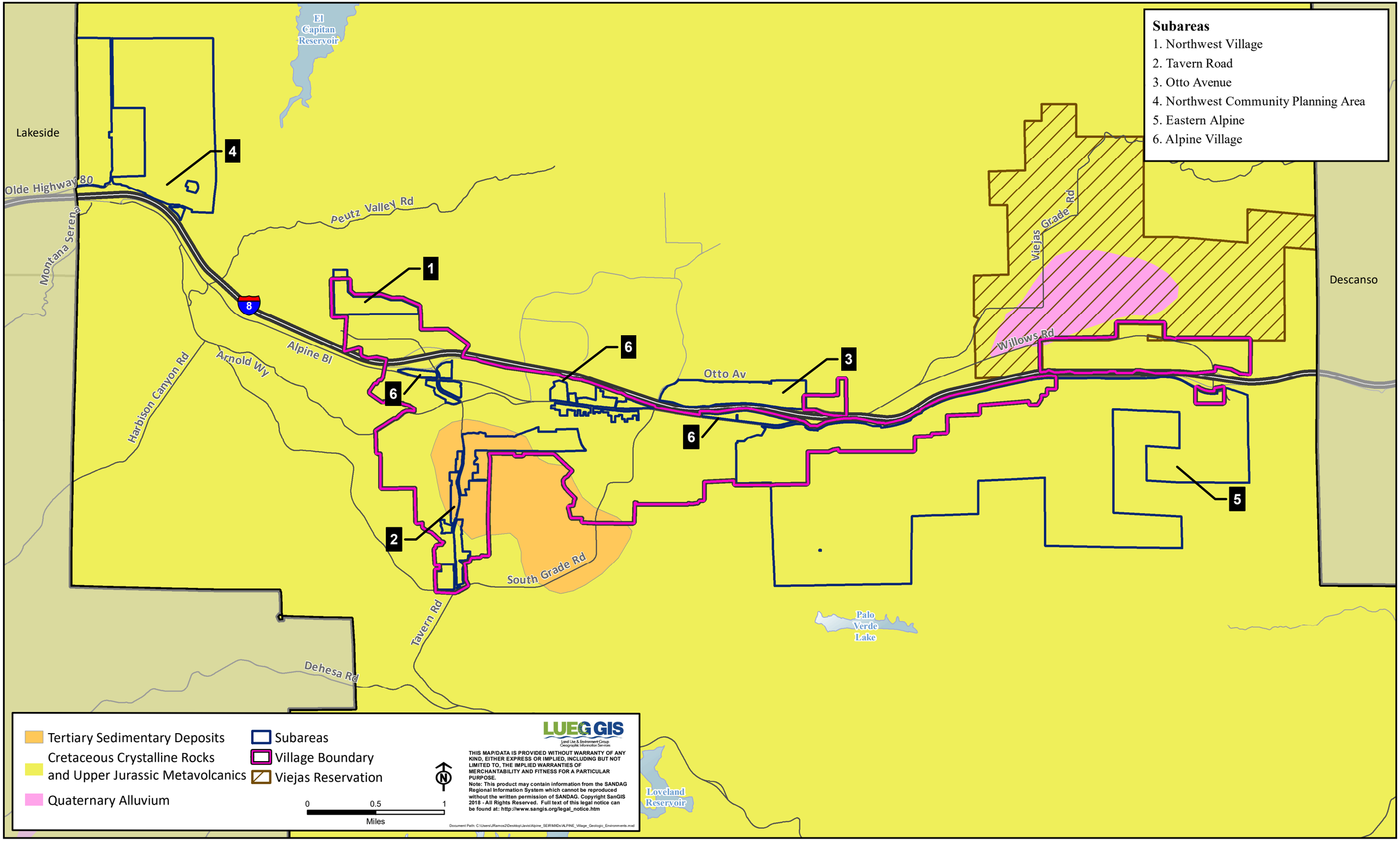
Source: SanGIS, County of San Diego, 2020

Figure 2.9-1a
Mineral Resources
Subareas 1-6



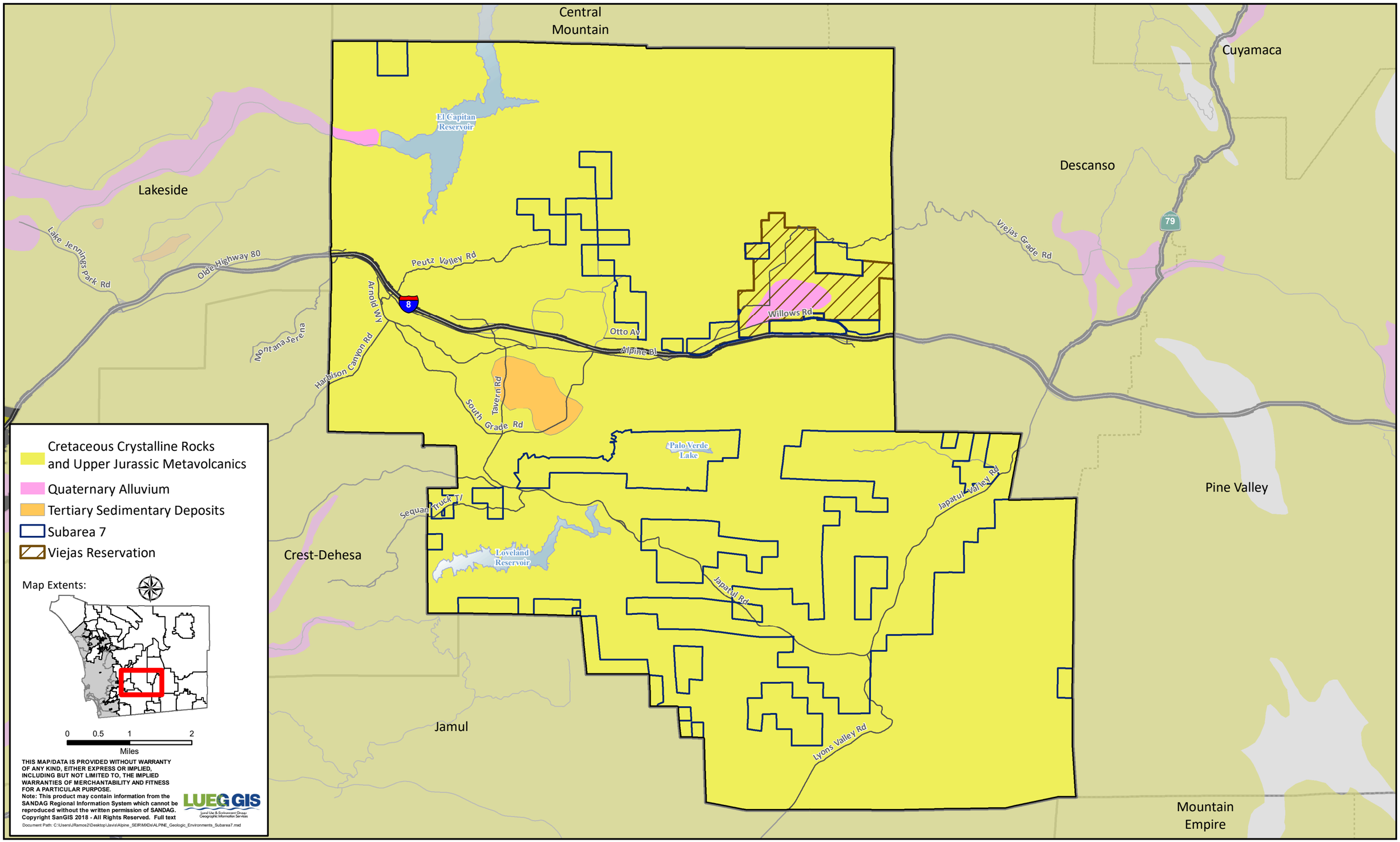
Source: SanGIS, County of San Diego, 2020

Figure 2.9-1b
Mineral Resources
Subarea 7



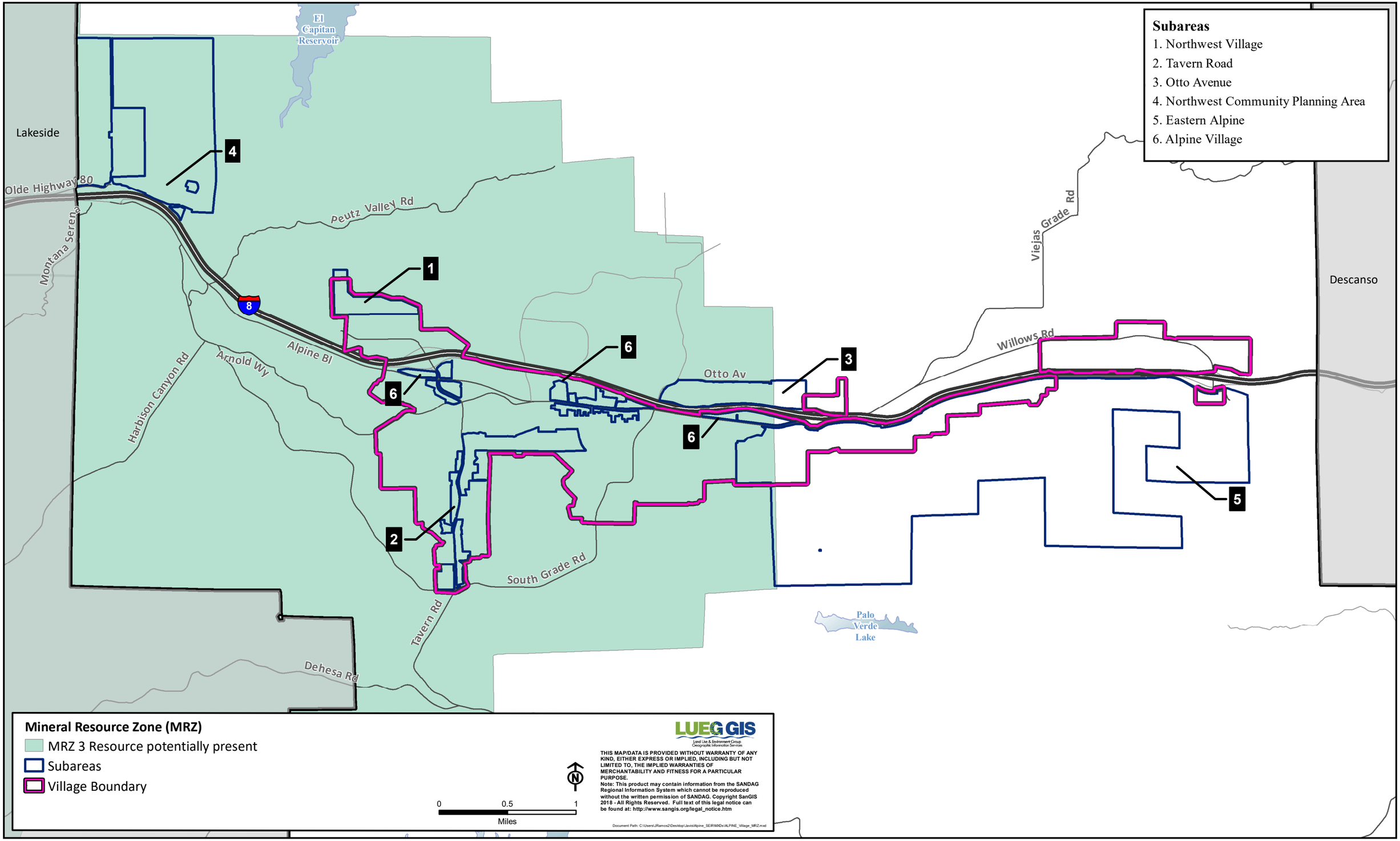
Source: SanGIS, County of San Diego, 2019

Figure 2.9-2a
Geologic Environments
Subareas 1-6



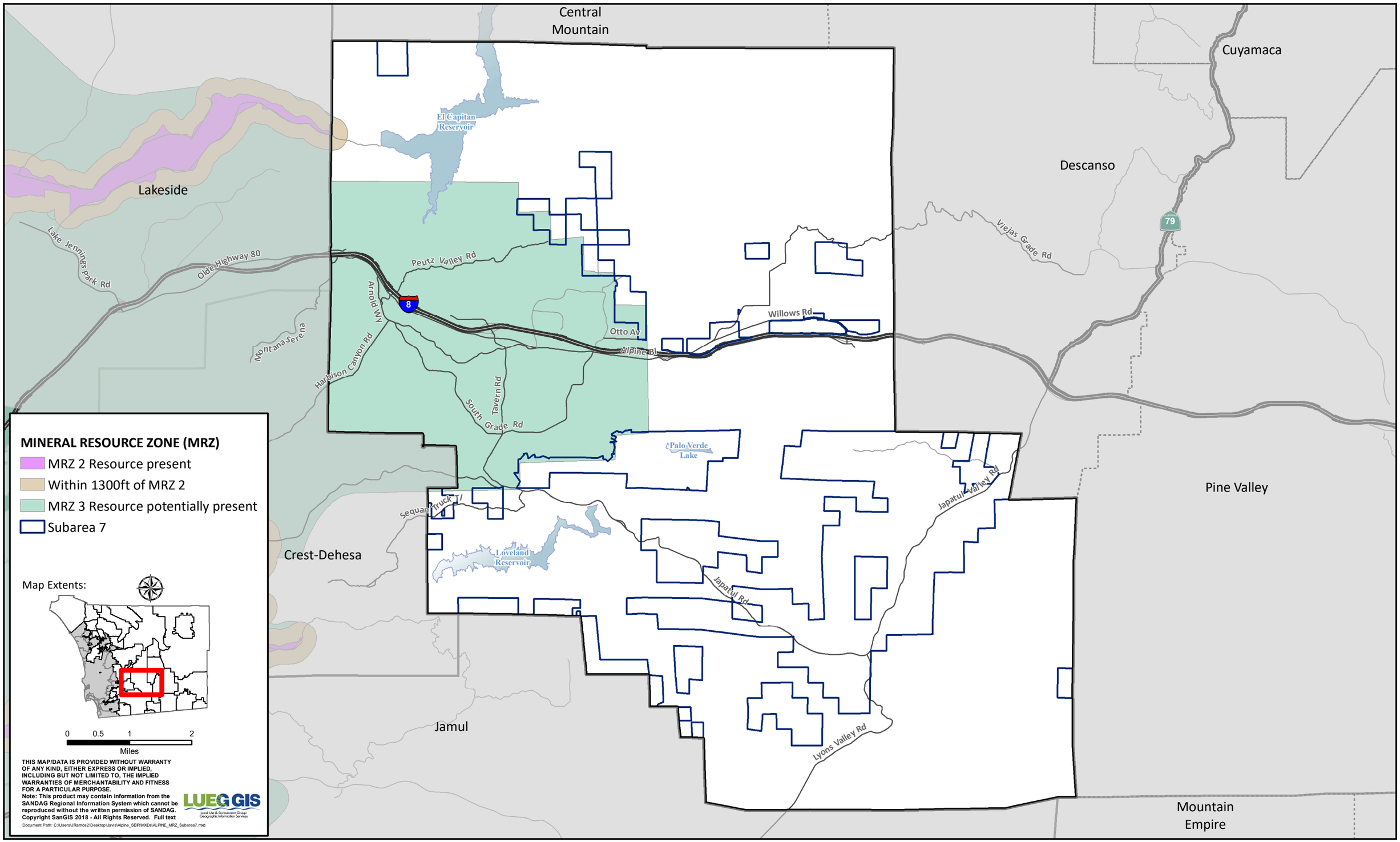
Source: SanGIS, County of San Diego, 2020

Figure 2.9-2b
Geologic Environments
Subarea 7



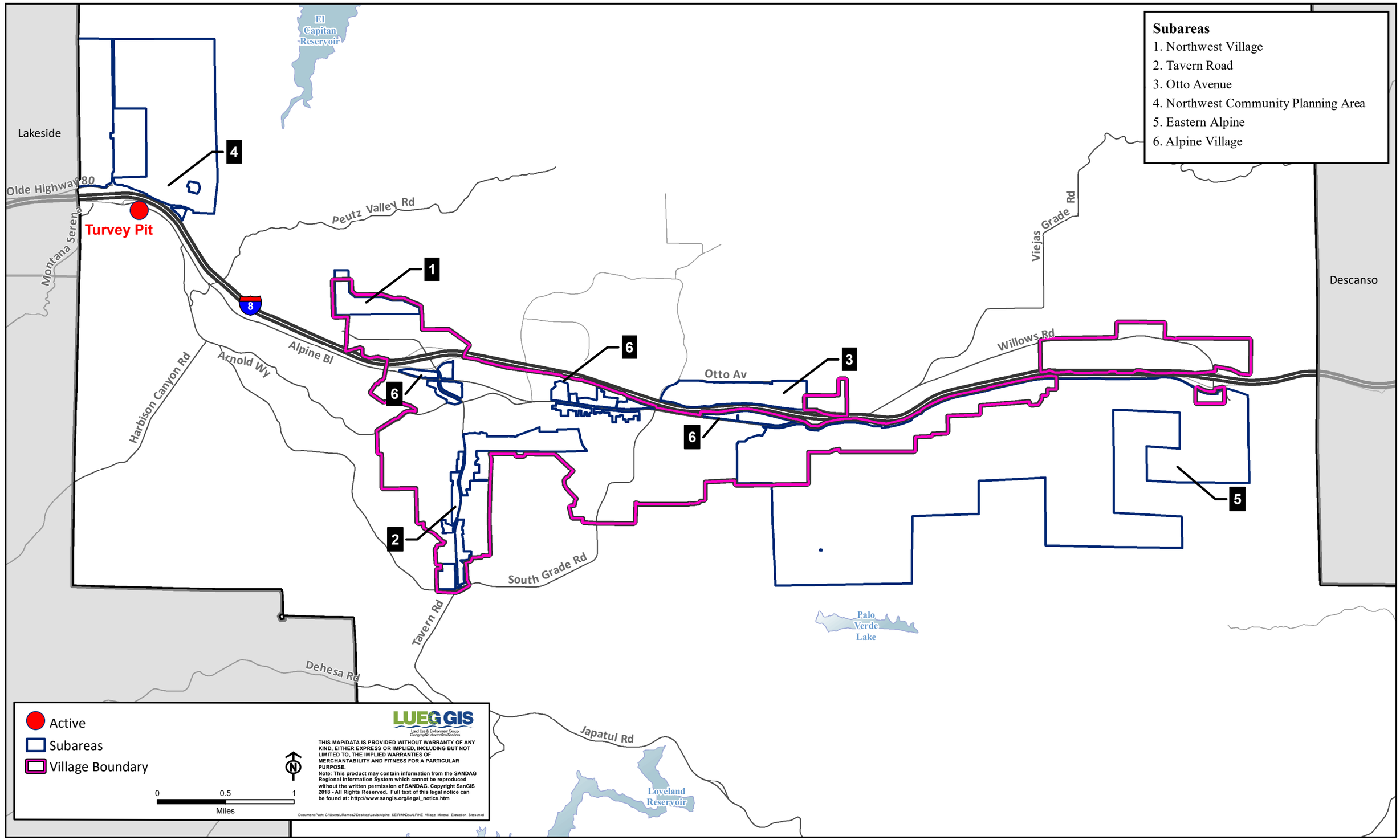
Source: SanGIS, County of San Diego, 2019

Figure 2.9-3a
Mineral Resource Zones
Subareas 1-6



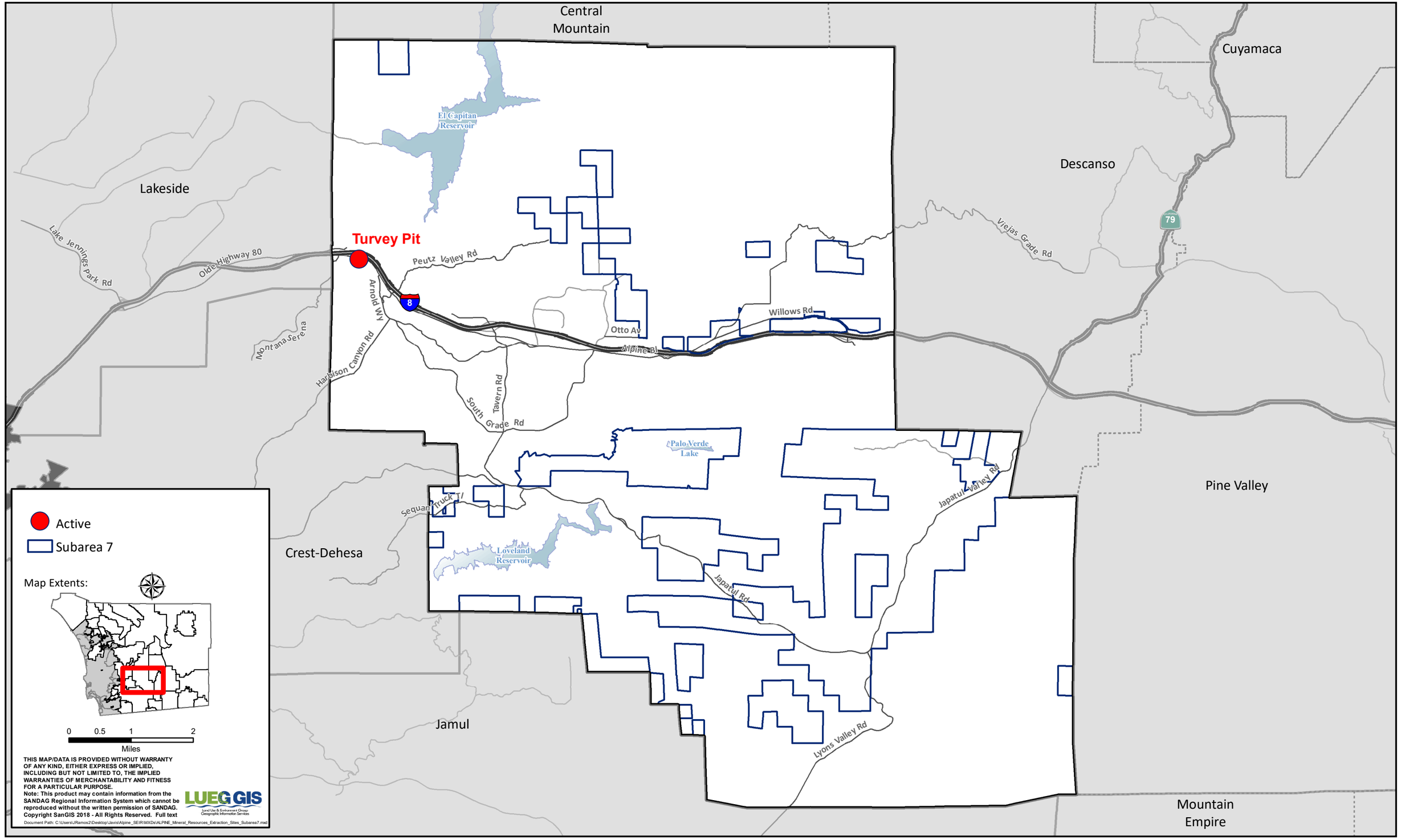
Source: SanGIS, County of San Diego, 2019

Figure 2.9-3b
Mineral Resource Zones
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.9-4a
Mineral Resource Extraction Sites
Subareas 1-6



Source: SanGIS, County of San Diego, 2018

Figure 2.9-4b
Mineral Resource Extraction Sites
Subarea 7

2.10 Noise

This section of the Supplemental Environmental Impact Report (SEIR) describes the existing noise and vibration conditions in the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on noise and vibration.

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative General Plan Amendment (GPA) Environmental Impact Report (FCI EIR) (referred to throughout the rest of the section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs have similar significance statements related to noise. Other documents referenced include the existing Alpine Community Plan and the County of San Diego Guidelines for Determining Significance – Noise (2009).

Table 2.10-1 summarizes the impact conclusions identified in this section.

Table 2.10-1. Noise Summary of Impacts

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
NOI-1	Excessive Noise Levels	Less than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
NOI-2	Excessive Groundborne Vibration or Noise	Less than Significant	Potentially Significant	Less than Significant	Less than Significant
NOI-3	Permanent Ambient Noise Level Increase	Significant and Unavoidable	Potentially Significant	Potentially significant	Significant and Unavoidable
NOI-4	Temporary Noise Level Increase	Less than Significant	Potentially Significant	Less than Significant	Less than Significant
NOI-5	Excessive Airport Noise Exposure	Less than Significant	Less than Significant	Less than Significant	Less than Significant

No comments were received in response to the Notice of Preparation regarding noise levels or exposure.

2.10.1 Existing Conditions

This section describes the existing noise and vibration setting of the Alpine CPA. Section 2.1.1 of the 2011 General Plan EIR and Section 2.10.1 of the FCI EIR included a discussion of existing conditions related to noise in the unincorporated County. Any projects that have occurred within the Alpine CPA were required to be consistent with the development allowed by the General Plan or via the General Plan amendment process. In addition, projects would have been required to comply with all applicable General Plan policies, ordinances, and mitigation measures of the prior EIRs to ensure that impacts remain less than significant. Therefore, no other changes to the existing conditions have been identified that would alter

the conclusions in the prior EIRs. The discussion of existing conditions from the prior EIRs is incorporated by reference.

Some growth has occurred in the Alpine CPA since the adoption of the prior EIRs. Therefore, the prior EIRs conditions represent a conservative baseline for comparison of potential future noise levels. Existing development has a rural character typified by light agricultural activities practiced in conjunction with low-density residential uses, with a central hub of industrial, commercial, and higher density residential land use designations. Noise-sensitive land uses (NSLU) in the Alpine CPA include residences, schools, hospitals, convalescent homes, hotels/motels, daycare facilities, and passive recreational parks.

2.10.1.1 Noise Measurements

New ambient noise measurements were not obtained as part of this analysis. Measured ambient noise levels, as well as baseline traffic noise levels within the Alpine CPA, are provided as part of the 2011 General Plan EIR. Specifically, the 2011 General Plan EIR included three noise measurements that give a snapshot of different types of noise levels currently experienced within the Alpine CPA: a measurement at Alpine Lutheran Church indicated a noise level of 52.6 A-weighted decibels (dBA) equivalent energy level (L_{eq}), and a measurement at the Alpine Branch Library indicated a noise level of 64.9 dBA L_{eq}. A third short-term noise measurement adjacent to Interstate (I-) 8, just east of the Alpine CPA (between Willows Road and Japatul Valley Road), indicated a noise level of 70.1 dBA L_{eq}. Because development and traffic conditions have not changed much in the community since the 2011 General Plan EIR, these noise levels are still a reliable (perhaps slightly conservative) indication of the variety of existing ambient noise conditions experienced in the CPA.

2.10.1.2 Transportation Noise Generators

Roadways

The primary source of noise affecting the Alpine CPA is traffic on I-8, which bisects the community from east to west. Lower noise levels are generated by local roadways, which have lower traffic volumes and lower traffic speeds. In the General Plan's Noise Element, Figure N-1 (May 2009), the County identifies existing County-wide noise contours from freeways and major arterials (Figures 2.10-1a through 1c). Existing roadway noise contours were determined from traffic data and expressed in terms of community noise equivalent level (CNEL) and are shown on Figures 2.10-1a, 1b, and 1c. Table N-1 of the General Plan's Noise Element identifies noise compatibility guidelines for various land uses. For NSLU, acceptable noise levels are acceptable up to 60 decibels (dB) CNEL for single-family residences, mobile homes, senior housing, and convalescent homes; and up to 65 dB CNEL for multi-family and mixed-used residential, schools, hospitals, hotels/motels, daycare facilities, and passive recreational parks. All NSLU are Conditionally Acceptable[1] with noise levels of up to 75 dB CNEL. The 2011 General Plan EIR estimated that 3,264 acres within the Alpine CPA are exposed to noise levels of 60 dB CNEL or more, 1,052 acres are exposed to noise levels of 65 dB CNEL or more, 126 acres are exposed to noise levels of 70 dB CNEL or more, and 4 acres are exposed to noise levels of 75 dB CNEL or more.

[1] *Conditionally Acceptable* means that new construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. If a project cannot mitigate noise to a level deemed *Acceptable*, the appropriate County decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.

Private Airstrips

The Alpine CPA is not exposed to substantial noise from aircraft because it is well outside the existing noise contours (60 dB CNEL or more) and Airport Influence Areas of any public use airports or military airfields. The closest public use airport is Gillespie Field, more than 8 miles to the west. The 2011 General Plan EIR noted one private airstrip within the Alpine CPA. This was identified as a USFS facility (airstrip) called On the Rocks Airport. According to Federal Aviation Administration (FAA) records, the airstrip is privately owned, has one single engine airplane based on the field, and no control tower (FAA 2020).

Railroads

No railroads are within or immediately adjacent to the Alpine CPA; therefore, rail noise does not contribute to existing noise levels.

2.10.1.3 Non-Transportation Noise Generators

Industrial, Commercial, Agricultural, and Extractive Operations

Noise generators not related to transportation are commonly called "stationary," "fixed," "area," or "point" sources of noise. Industrial processing; mechanical equipment; pumping stations; and heating, ventilating, and air conditioning (HVAC) equipment are examples of fixed location, non-transportation noise sources. Some non-transportation sources are not stationary but are typically assessed as point or area sources due to the limited area in which they operate, such as truck deliveries, agricultural field machinery, and mining equipment. Existing non-transportation noise sources that affect the Alpine CPA are described below.

Noise generated by industrial and commercial operations, maintenance, manufacturing, and truck traffic (loading docks) can affect surrounding NSLU. Industrial and commercial uses within Alpine are primarily located along the I-8 corridor, with a central industrial hub northwest of the I-8/Tavern Road Interchange and adjacent to the existing Crown Hills community. Additional industrial uses are north and south of I-8 close to the western edge of the Alpine CPA. The industrial use south of I-8 is Turvey's Granite Pit (i.e., extractive operations), just southeast of the I-8/Dunbar Lane interchange. Agricultural uses are distributed throughout the rural and semi-rural portions of the Alpine CPA.

Temporary/Nuisance Noise

Intermittent or temporary neighborhood noise from sources such as amplified music, public address systems, barking dogs, landscape maintenance, stand-by power generators, motorized recreation, and construction activities are disturbing to residents but are difficult to attenuate and control. Historical data show that, since 2014, the Alpine community has had 36 total noise-related code compliance cases; 27 have been animal related and nine have been related to non-animal noise sources.

2.10.2 Regulatory Framework

Section 2.11.1 of the 2011 General Plan EIR and 2.10.2 of the FCI EIR include a discussion of the Regulatory Framework related to noise in the unincorporated County, including the Alpine CPA, which is hereby incorporated by reference. The regulations described in the prior EIRs that were applicable to the entire County have not changed since adoption, with the exception of new versions of specific guidance or regulations that have been published and are noted below.

Applicable federal regulations include:

- FAA Standards
- Federal Highway Administration (FHWA) Standards
- Federal Railroad Administration (FRA) Standards
- Federal Transit Administration (FTA) Standards (the 2006 FTA Transit Noise and Vibration Impact Assessment Manual noted in the 2011 General Plan EIR was updated in 2018)
- US Office of Surface Mining Reclamation and Enforcement.

Applicable state regulations include:

- California Noise Control Act of 1973
- California Noise Insulation Standards (California Code of Regulations [CCR] Title 24) (the code was updated in 2016 and the relevant reference is Chapter 12, Section 1207, Sound Transmission)
- California Airport Noise Standards (CCR, Title 21, Section 5000 et. seq.)
- Streets and Highways Code
- California Vehicle Code (Sections 27200–27207)
- California Harbors and Navigation Code.

Applicable local regulations include:

- County of San Diego General Plan, Noise Element (at the time of the 2011 General Plan EIR preparation, the update was proposed but not adopted; the updated noise element was subsequently adopted in August 2011)
- County of San Diego Code of Regulatory Ordinances, Title 3, Division 6, Chapter 4, Sections 36.401–36.435, Noise Ordinance
- County of San Diego Code of Regulatory Ordinances, Title 6, Division 3, Chapter 4, Sections 63.401–63.402, Agricultural Enterprise and Consumer Information Ordinance.

2.10.2.1 County of San Diego General Plan Policies

The General Plan includes goals and policies applicable to noise that are primarily located within the Noise Element, with some also identified in the Land Use and Mobility Elements.

Land Use Element

Land Use Element Goal LU-2 is in place to conserve and enhance the unincorporated County's varied communities, rural setting, and character. Policy LU-2.8 supports this goal by requiring measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise and vibrations.

Mobility Element

Mobility Element Goal M-1 identifies the importance of a safe and efficient road network that balances regional needs and preferences of the communities. Policy M-1.3 recommends narrower road rights-of-ways and lower design speeds in areas planned for substantial development in an effort to reduce noise impacts.

Mobility Element Goal M-2 prioritizes a road network that provides adequate capacity, while supporting other General Plan goals such as providing environmental protections and enhancing community

character. Policy M-2.4 addresses this goal by recommending that buffers or other noise reduction measures are included in the siting and design of roads located next to sensitive noise receptors to minimize adverse impacts from traffic noise.

Noise Element

The Noise Element captures the majority of noise-related goals and policies that support the General Plan guiding principles to protect the County's unique natural environment and unique characteristics. Goals N-1 through N-3 are directed to preserve rural areas from the encroachment through promoting compatibility between land uses to prevent excessive noise exposure to residents while protecting facilities or operations that may generate noise. Policy N-1.5 recommends working with transit agencies and/or other jurisdictions to provide services or facilities to minimize regional traffic noise and other sources of noise. Policies N-2.1 and N-2.2 provide guidance on how to reduce development impacts to noise-sensitive land uses via acoustical studies and/or noise barriers. Policy N-3.1 refers to the FTA and FRA guidelines to limit exposure of sensitive uses to groundborne vibration from trains, construction equipment, and other services.

Goals N-4 and N-5 are intended to minimize noise impacts associated with transportation and non-transportation noise generators. Policy N-4.1 requires that projects proposing a General Plan amendment that would increase average daily traffic beyond what is anticipated in the General Plan do not increase cumulative traffic noise to off-site sensitive land uses beyond acceptable levels. Policies N-4.2 and N-4.5 minimize noise through guidance for roadway design and location. For County road improvement projects, policy N-4.6 requires that General Plan noise standards are applied if the ambient noise level would increase more than 3 decibels for NSLU or limits in the FHWA Standards are applied for federally funded roadway construction projects. Policies N-5.1 and N-5.2 address noise impacts via guidance for locating industrial and commercial development in proximity to residential land uses.

Noise Element Goal N-6 aims to minimize effects of intermittent, short-term, or other nuisance noise sources to NSLU. Policies N-6.1, N-6.2, and N-6.6 meet this goal through development and updating of noise regulations, implementation of General Plan noise standards, and enforcement of County noise codes and ordinances. Policies N-6.3 through N-6.5 reduce noise impacts by requiring development and special events to be limited in frequency or duration.

2.10.2.2 Alpine CPU Policies

Specific Alpine CPU goals and policies in the Mobility and Noise Elements relevant to impacts and noise are summarized below.

Mobility Element

Mobility Element Goal M-1 aims to support a multi-modal transportation system that serves the citizens of Alpine and enhances the beauty and quality of the built environment. Policies M-1.3, M-1.4, and M-1.8 implement this goal through encouraging traffic calming along specific roadways and through roadway design recommendations.

Noise Element

Noise Element Goal N-1 is proposed to maintain the tranquility of residential neighborhoods by reducing potential noise pollution. Policy N-1.1 meets this goal through encouraging land use and circulation patterns to minimize noise in residential neighborhoods.

2.10.3 Analysis of Project Effects and Determination as to Significance

Based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines and County of San Diego Guidelines for Determining Significance - Noise (2009), the proposed project would result in a significant impact if it would:

- Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. Expose persons or generate excessive groundborne vibration or groundborne noise.
- Result in a substantial permanent increase in ambient noise levels in the project vicinity, above levels existing without the proposed project.
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, above levels existing without the proposed project.
- For a project in the vicinity of a private airstrip, expose individuals residing or working in the project area to excessive noise levels.

2.10.3.1 Issue 1: Excessive Noise Levels

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and County of San Diego Guidelines for Determining Significance - Noise (2009), the proposed project would have a significant impact if it would result in the exposure of any existing or reasonably foreseeable future NSLU to exterior or interior noise, including existing and planned Mobility Element roadways, railroads, and all other noise sources (with the exception of airports), in excess of any of the following:

- Exterior Locations:
  - Roadways and all other noise sources: 60 or 65 dBA (CNEL) in Noise Compatibility Guidelines (Table N-1 of the Noise Element) or an increase of 10 dBA (CNEL) over pre-existing noise in areas where the ambient noise level is 49 dBA (CNEL) or less.
  - Railroads: 60 dBA (CNEL) or an increase of 10 dBA (CNEL) over pre-existing noise in areas where the ambient noise level is 49 dBA (CNEL) or less.

In the case of single-family residential detached NSLU, exterior noise shall be measured at an outdoor living area that adjoins and is on the same lot as the dwelling, and that contains at least the following minimum area:

- Net lot area up to 4,000 square feet: 400 feet
- Net lot area 4,000 square feet to 10 acres: 10% of net lot area
- Net lot area over 10 acres: 1 acre

For all other projects, exterior noise shall be measured at all exterior areas provided for group or private usable open space.

- Interior Locations:
  - 45 dBA (CNEL) except for the following cases:

- Rooms which are usually occupied only a part of the day (schools, libraries, or similar facilities), the interior one-hour average sound level due to noise outside should not exceed 50 dBA.
- Corridors, hallways, stairwells, closets, bathrooms, or any room with a volume less than 490 cubic feet.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant impacts associated with the exposure of NSLU to noise levels in excess of noise compatibility guidelines. The discussion of impacts related to excessive noise levels from implementation of the 2011 General Plan and the FCI GPA can be found in Section 2.11.3.1 of the 2011 General Plan EIR and in Section 2.10.3.1 in the FCI EIR and are incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to expose land uses near roadways or railroads to noise levels in excess of noise compatibility guidelines and have the potential to contribute to a potentially cumulative impact associated with excessive noise levels. The FCI EIR noted that the greatest increase in traffic and therefore increases in noise levels would be concentrated in Alpine, along portions of Alpine Boulevard, West Willows Road, and East Willows Road. In addition, the FCI EIR noted that the FCI GPA would re-designate former FCI lands that were not previously subject to noise compatibility criteria (i.e., forest land to village residential). Noise impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies.

The proposed project would increase development potential and, subsequently, population density relative to the current General Plan in three of the seven subareas. The potential change in land uses that would be permitted under the proposed project, compared to the current General Plan, is provided in Chapter 1, Section 1.4, *Project Description*. It should be noted that the General Plan development intensity and densities have not yet been fully built out, so the analysis below focuses on the potential change to the environment when comparing the 6,430 dwelling units currently allowed in the CPA under the current General Plan to the 8,443 dwelling units that would be allowed by the proposed project, an increase of 2,013 dwelling units in total.

These proposed land use changes would increase potential traffic noise impacts in two ways. First, additional NSLU would be developed in areas already predicted to have potentially excessive future traffic noise levels. Second, the increased development density would bring additional traffic (see Section 2.13, *Transportation*). Increased traffic noise would potentially affect NSLU within and adjacent to each subarea, as well as uses along the main roadways that connect each subarea to I-8. Existing NSLU that could be affected by increased traffic noise associated with Subarea 1 are primarily residences; existing NSLU in the vicinity of Subarea 2 are primarily residences, as well as churches, Boulder Oaks Elementary School, and Joan MacQueen Middle School; existing NSLU in the vicinity of Subarea 3 are residences; existing NSLU in the vicinity of Subarea 4 are primarily residences, as well as a church and Los Coches Creek Middle School; existing NSLU in the vicinity of Subarea 5 are primarily residences; and existing NSLU in the vicinity of Subarea 6 are primarily residences, as well as a number of churches. In addition, the proposed project includes new roadway connections.

The proposed project would provide for new roadway connections and allow for a greater density and increase in commercial and village core mixed use. Additionally, the number of dwelling units in Subareas 2, 4, and 6 would increase; however, Subarea 5 would have a reduction in dwelling units. Any future discretionary development projects would be subject to an environmental review process, which may

include site-specific noise studies. The purpose of the review process is to identify potential noise and vibration sources, ensure compliance with the Noise Ordinance, and identify mitigation measures that would minimize impacts related to noise and vibration. In addition, any future projects in the Alpine CPA will be subject to federal, state, and local regulations, and must conform to the goals and policies established in the General Plan. Despite these regulations and policies, this impact is **potentially significant** because the increase in development could expose persons to or generate noise levels in excess of standards in the General Plan, noise ordinance, or applicable standards within the Alpine CPA.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.10.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to reduce the potential exposure of persons or generate excessive transportation noise levels from roadways that are also applicable to the proposed project. The General Plan includes several policies within the Land Use, Mobility, and Noise Elements that would reduce the potential for the proposed project to expose persons or generate excessive transportation noise levels from roadways, because these policies require proposed development to implement design features and measures (e.g., roadway design, roadway noise buffers, traffic calming, etc.) that will minimize excessive noise levels. These include policies LU-2.8, M-1.3, M-2.4, N-1.5, N-2.1, N-2.2, N-4.1, N-4.2, and N-4.5, which are summarized in Section 2.10.2, above.

The prior EIRs also identified several mitigation measures addressing impacts related to excessive noise that would be applicable to the proposed project, including Noi-1.1 through Noi-1.5, Noi-1.8, and Noi-1.9, which are provided in Appendix B.

Summary

The proposed project increases the permitted densities within the CPA, which may impact noise levels. New traffic on existing and proposed roadways would increase overall noise levels from local streets and arterials, effectively expanding the future noise contour areas. As such, the proposed project would cause a more severe significant impact related to excessive transportation noise levels from roadways compared to the significant impact determined within the prior EIRs. As a result, the future impacts under the proposed project would increase relative to those identified in the prior EIRs, and the impact would be **potentially significant** and mitigation would be required **(Impact-NOI-1)**.

2.10.3.2 Issue 2: Excessive Groundborne Vibration or Noise

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would result in the exposure of vibration-sensitive uses to groundborne vibration and noise equal to or greater than the levels shown in Table 2.10-2 (*Groundborne Vibration and Noise Standards*), or if new sensitive land uses would be located in the vicinity of groundborne vibration–inducing land uses such as railroads or mining operations. The groundborne vibration and noise standards identify the following three land use categories with increasing sensitivity to groundborne vibration and noise impacts:

- Category 1: Buildings where low ambient vibration is essential for interior operations (research and manufacturing facilities with special vibration constraints)
- Category 2: Residences and buildings where people normally sleep (hotels, hospitals, residences, and other sleeping facilities)

Table 2.10-2 Ground-borne Vibration and Noise Standards[1]

Land Use Category[2]	Definition	Ground-Borne Vibration Impact Levels (inches per second RMS)		Ground-Borne Noise Impact Levels (dB re 20 micro Pascals)	
		Frequent Events[3]	Occasional or Infrequent Events[4]	Frequent Events[3]	Occasional or Infrequent Events[4]
Category 1	Buildings where low ambient vibration is essential for interior operations (research & manufacturing facilities with special vibration constraints).	0.0018[5]	0.0018[5]	Not Applicable	Not Applicable
Category 2[6]	Residences and buildings where people normally sleep (hotels, hospitals, residences, & other sleeping facilities).	0.0040	0.010	35 dBA	43 dBA
Category 3[6]	Institutional land uses with primarily daytime use (schools, churches, libraries, other institutions, & quiet offices).	0.0056	0.014	40 dBA	48 dBA

RMS = root mean squared

(1) Vibration-sensitive equipment is not sensitive to ground-borne noise.

(2) There are some buildings, such as concert halls, TV and recording studios, and theaters that can be very sensitive to vibration and noise but do not fit into any of the three categories. Refer to Table 3 in the County of San Diego Guidelines for Determining Significance, Noise for acceptable levels of ground-borne vibration and noise for these various types of special uses.

(3) "Frequent Events" is defined as more than 70 vibration events per day. Most rapid transit projects fall into this category.

(4) "Occasional or Infrequent Events" are defined as fewer than 70 vibration events per day. This combined category includes most commuter rail systems.

(5) This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration sensitive manufacturing or research will require detailed evaluation to define acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.

(6) For Categories 2 and 3 with occupied facilities, isolated events such as blasting are significant when the peak particle velocity (PPV) exceeds one inch per second. Non-transportation vibration sources such as impact pile drivers or hydraulic breakers are significant when their PPV exceeds 0.1 inch per second.

Source: County of San Diego, Planning & Development Services, 2009c.

Various construction activities have the potential to generate groundborne vibration and groundborne noise perceptible to nearby receptors. Such sources include blasting, pile driving, and mechanized construction equipment such as graders, bulldozer, and jackhammers. These sources would also have the potential to exceed vibration standards for all three land use categories, depending on the distance between construction activities and the nearest buildings. The magnitude of individual impacts within the Alpine CPA with the proposed project would be approximately the same as those that would occur under implementation of the current General Plan. However, with the proposed increase in development density, the likelihood of any given construction project occurring in proximity to a sensitive receptor would generally increase, and there would be a corresponding increase in the number of potentially

significant impacts. Therefore, typical construction activities have the potential to exceed groundborne vibration and groundborne noise standards and expose vibration-sensitive land uses to excessive groundborne vibration and noise and result in more severe impacts than identified in the prior EIRs. As such, the proposed project would result in a **potentially significant** impact associated with the generation of groundborne vibration and noise during construction activities.

Extractive Operations (Mines and Quarries)

The only active extractive operations in the Alpine CPA occur at Turvey's Granite Pit, which is located just southeast of the I-8/Dunbar Lane interchange. This facility does not utilize blasting. As a result, activities that result in groundborne vibration or noise are limited to the operation of heavy equipment similar to what might be used for construction projects (backhoes, rock breakers, drills, etc.). The proposed project does not propose any changes to Turvey's Granite Pit. In addition, the pit is separated from the closest subarea (Subarea 4) by Alpine Boulevard, I-8, and Chocolate Summit Drive. This equates to a distance of over 500 feet, which would attenuate groundborne vibration to less than significant levels. The proposed project does not propose or permit any new mines or quarries. Any new extractive operations that might be proposed in the future would be subject to separate environmental review at that time and would be subject to applicable laws and regulations. Therefore, similar to the prior EIRs, mining-related damage to residential structures from groundborne vibration would not occur as a result of the proposed project and the impact would be **less than significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.10.2, numerous federal, state, and local regulations are in place to reduce the potential for the proposed project to generate excessive groundborne vibration or groundborne noise levels from construction activity or extractive operations. All projects proposed after the implementation of the proposed project would be required to comply with all applicable regulations pertaining to groundborne vibration or noise. For example, the Noise Element and Noise Ordinance establish groundborne vibration limits that must be adhered to for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet. In addition to these regulations and policies, all discretionary approvals are also subject to CEQA, which requires consideration of potential impacts of groundborne vibration and noise.

The General Plan also includes several policies within the Noise Element that would reduce the potential for the proposed project to generate excessive groundborne vibration or groundborne noise levels from construction activity or extractive operations, specifically the policies presented in Section 2.10.2. These policies require proposed development to limit the extent of exposure to sensitive uses, utilize setbacks, and limit the use of high-noise equipment that would minimize excessive groundborne vibration. These include policies N-3.1, N-5.2, N-6.3, and N-6.4, which are described in Section 2.11.2, above. Additionally, the prior EIRs identified several mitigation measures addressing groundborne vibration impacts that would be applicable to the proposed project, including Noi-2.2 through Noi-2.4, which are provided in Appendix B.

Summary

The proposed project would cause more severe potentially significant impacts related to excessive groundborne vibration or groundborne noise levels from construction activities but would not affect impacts related to extractive operations as compared to the prior EIRs. Therefore, the impacts associated with groundborne vibration would be **potentially significant,** and mitigation is required **(Impact-NOI-2).**

2.10.3.3 Issue 3: Permanent Ambient Noise Level Increase

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact from non-transportation noise sources if it would result in a substantial permanent increase in ambient noise that would exceed the sound level limits specified in County of San Diego Code Section 36.404, *General Sound Level Limits*, at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise.

If the measured ambient level exceeds the applicable limit from Code Section 36.404, the allowable 1-hour average sound level would be the 1-hour average ambient sound level, plus 3 dB. The ambient noise level must be measured when the alleged noise violation source is not operating. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. The 1-hour average sound level limit applicable to extractive industries, including borrow pits and mines, is 75 dBA at the property line regardless of the zone where the extractive industry is located. Proposed extractive facilities would be subject to the noise standards within the Noise Element at the proposed site and adjacent uses. Fixed-location public utility distribution or transmission facilities located on or adjacent to a property line are subject to the sound level limits identified in this section, measured at or beyond 6 feet from the boundary of the easement upon which the equipment is located. However, some uses are exempt from the Noise Ordinance. Exemptions are listed in San Diego Code Section 36.417 and apply to certain instances of emergency work, school activities, public events, emergency generators, agricultural operations, and property maintenance.

Permanent traffic noise impacts would be significant if the proposed project would raise the noise levels above the County of San Diego Guidelines for Determining Significance of 60 dB CNEL. In areas where the existing noise level without the project is above 60 but below 65 dB, the proposed project would result in a significant impact if an increase of more than 3 dB would occur, in accordance with the FTA noise impact criteria. Where the existing noise exposure is between 65 and 70 dBA, a significant impact would occur if the proposed project would exceed the existing noise level by more than 1 dB. Where the existing noise exposure exceeds 70 dBA, any increase in the noise level would be considered significant.

Impact Analysis

The prior EIRs determined that future development would permanently increase ambient noise along roadways, and implementation of the current General Plan would result in a potentially significant impact and result in a cumulatively considerable contribution to a potentially significant cumulative impact. The discussion of impacts related to the permanent increase in ambient noise levels from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.11 of the 2011 General Plan EIR and Section 2.10 of the FCI EIR and is incorporated by reference. Although implementation of the General Plan policies and mitigation measures would reduce the direct and cumulative impacts identified in the prior EIRs to the extent feasible, impacts associated with permanent noise increases were concluded to remain significant and unavoidable.

As identified in Section 2.1413, *Transportation*, the proposed project would lead to increased traffic volumes on many roads within the Alpine CPA relative to both existing conditions and the current adopted Community Plan. This is due to the higher development density that would be permitted by the proposed project. Under the proposed project, the future traffic volumes on all of the analyzed roadways would be equal to or greater than those for existing conditions or the current plan. In addition, the project proposes several new roadway connections. Traffic on these new connections would represent a new noise source with associated noise increases at adjacent NSLU. As a result, overall impacts related to traffic noise

increases would be greater than those described in the prior EIRs, and permanent increases in roadway noise would be potentially significant. Therefore, this would be considered a significant impact of the proposed project.

Industrial, Commercial, and Agricultural Operations

Industrial, commercial, and agricultural land uses often involve the use of machinery and other equipment that would have the potential to generate noise that exceeds noise standards. A potential noise impact would occur from the development of industrial, commercial, or agricultural land uses in areas that are relatively quiet and contain or are designated for NSLU. Impacts could also occur as a result of developing new NSLU close to existing industrial, commercial, or agricultural land uses.

Operation of an industrial or commercial facility can cause the exposure of on- or off-site areas to increased noise associated with mechanical equipment (pumps, rooftop equipment, condenser units, air conditioning units, pneumatic equipment), operation-related traffic (vehicle movement, engine noise), speakers, bells, chimes, and outdoor human activity in defined limited areas. Analysis conducted as part of the prior EIRs suggests potential impacts could occur at distances of up to 450 feet from the source.

Agricultural noise sources typically include truck operations (delivery and shipping) and operation of farming equipment such as tractors. The community noise survey described in the prior EIRs identified agricultural operations as having a noise level range of 44.4 to 68.3 dBA, which may exceed the daytime noise level limits for NSLU identified in the County's Noise Ordinance.

The proposed project would allow increased commercial, mixed use, and residential development, including in proximity to industrial zones and potential agricultural activity, which could impact nearby NSLU. Increased residential density near industrial zones could occur at the south end of Subarea 4. Given the prevalence of rural and semi-rural zones throughout the Alpine CPA, increased residential density near agricultural activity could potentially occur in any of the subareas, with the possible exception of Subarea 6 because the surrounding properties are mostly already developed with non-agricultural land uses (residential or commercial uses, as well as I-8). The proposed project would also allow new commercial uses, although these would be limited to Subareas 4 and 6 and a relatively small General Commercial zone (approximately 7 acres) within Subarea 5. As a result, significant noise impacts related to industrial, commercial, and agricultural land uses would be greater than those described in the prior EIRs. Therefore, this would be considered a **potentially significant** impact of the proposed project.

Extractive Operations (Mines and Quarries)

The 1-hour average sound level limit applicable for extractive industries is 75 dBA, regardless of the zone in which the extractive industry is located, as stated in Section 36.404(e) of the Noise Ordinance. Based on the analysis conducted for the prior EIRs, heavy equipment used in quarry and mining activities would have the potential to generate noise levels that would exceed County noise standards at surrounding land uses. However, no new mining operations are proposed or permitted as part of the proposed project, and any future extractive facilities would be subject to their own separate environmental review. Such projects would be subject to all applicable laws and regulations, including the noise standards of the Noise Element and Noise Ordinance. As a result, impacts related to extractive operations would be **less than significant** with the implementation of the proposed project.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, state and local regulations identified in Section 2.10.2, *Regulatory Framework*, are applicable to the proposed project and the potential permanent increase in ambient noise levels. The

General Plan Land Use, Mobility, and Noise Elements include several policies that require proposed development to implement design features and measures (e.g., roadway design, roadway noise buffers, traffic calming) that would minimize permanent increase in ambient noise levels. These include policies LU-2.8, M-1.3, M-2.4, N-1.5, N-4.1, N-4.2, N-4.6, N-5.1, and N-5.2, which are summarized in Section 2.10.2, above.

The prior EIRs identified several mitigation measures addressing impacts associated with increased ambient noise levels that would be applicable to the proposed project, including Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3, Noi-2.4, Noi-3.1, and Noi-3.2, which are provided in Appendix B.

Summary

The proposed project would cause more severe impacts related to permanent increases in noise levels from roadways, industrial, commercial, and agricultural land uses compared to the prior EIRs. Therefore, impacts to permanent ambient noise level increase would be **potentially significant**, and mitigation is required **(Impact-NOI-3)**.

2.10.3.4 Issue 4: Temporary Ambient Noise Level Increase

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would result in a substantial temporary or periodic increase in ambient noise levels during construction, which, together with noise from all sources, would exceed the standards listed in County of San Diego Code Sections 36.408 (*Hours of Operation of Construction Equipment*) and 36.409 (*Sound Level Limitations on Construction Equipment*). Sections 36.408 and 36.409 state that, except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

- Between the hours of 7:00 p.m. and 7:00 a.m.
- On a Sunday or a holiday. For the purposes of this section a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th and any day appointed by the President as a special national holiday or the Governor of the State as a special State holiday. A person may, however, operate construction equipment on a Sunday or holiday between the hours of 10:00 a.m. and 5:00 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in Sections 36.409 and 36.410.
- That exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

The County Noise Ordinance also includes standards for other sources of temporary and nuisance noise. Section 36.410, Sound Level Limitations on Impulsive Noise, states that except for emergency work, no person shall produce or cause to be produced an impulsive noise that exceeds the following standards when measured at the boundary line of or on any occupied property for 25% of the minutes in the measurement period:

- 82 dBA at an occupied residential, village zoning, or civic use, or 85 dBA at an occupied agricultural, commercial, or industrial use; or

- 85 dBA at an occupied residential, village zoning, or civic use, or 90 dBA at an occupied agricultural, commercial, or industrial use for a public road project.

The minimum measurement period for any measurements conducted under this section is 1 hour. During the measurement period, a measurement must be conducted every minute from a fixed location on an occupied property. The measurements must measure the maximum sound level during each minute of the measurement period. If the sound level caused by construction equipment or the producer of the impulsive noise exceeds the maximum sound level for any portion of any minute, then the maximum sound level was exceeded during that minute.

Section 36.413, *Multiple Family Dwelling Units*, states that, notwithstanding any other provisions of the Noise Ordinance, it shall be unlawful for any person to create, maintain or cause to be maintained any sound within the interior of any multiple family dwelling unit which causes the noise level to exceed 45 dBA between 10:00 p.m. and 7:00 a.m. and 55 dBA between 7:00 a.m. and 10:00 p.m. Additionally, it shall be unlawful for any person to generate an interior noise level to exceed 40 dBA for one minute in one hour or 35 dBA for five minutes in one hour between the hours of 10:00 p.m. and 7:00 a.m., or to exceed 50 dBA for one minute in one hour or 35 dBA for five minutes in one hour between the hours of 7:00 a.m. and 10:00 p.m.

Section 36.414, *General Noise Regulations* of the County of San Diego Noise Ordinance includes additional noise standards for disturbing, excessive or offensive noise. Generally, this section states that it shall be unlawful for any person to make, continue, or cause to be made or continued, any disturbing, excessive or offensive noise which causes discomfort or annoyance to reasonable persons of normal sensitivity residing in the area.

Section 36.416, *Noise from Off-Road Recreational Vehicles*, states that no person shall operate or allow the operation of an off-road recreational vehicle on private property that produces a noise when measured at the boundary line of or on any occupied property that at any time exceeds the following maximum sound levels: 82 decibels between the hours of 7:00 a.m. and 7:00 p.m., 77 decibels between the hours of 7:00 p.m. and 10:00 p.m., and 55 decibels between the hours of 10:00 p.m. and 7:00 a.m.

Impact Analysis

The prior EIRs determined that future development would have the potential to temporarily increase ambient noise from construction activity as well as other sources of temporary or nuisance noise. Therefore, implementation of the 2011 General Plan and FCI GPA would result in a potentially significant impact. However, implementation of General Plan policies and mitigation measures, in addition to compliance with applicable regulations, would mitigate the direct impacts from the 2011 General Plan and FCI GPA to a less than significant level. In addition, the 2011 General Plan or FCI GPA would not contribute to a potentially significant cumulative impact associated with a temporary increase in ambient noise levels. The discussion of impacts related to a temporary increase in ambient noise levels from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.11 of the 2011 General Plan EIR and Section 2.10 of the FCI EIR and are incorporated by reference.

Construction Noise

The types of construction activity that would occur under the proposed project would be the same as those analyzed as part of the prior EIRs. As described therein, the construction of future land uses and infrastructure would have the potential to result in the exposure of on- or offsite areas to noise in excess of the standards listed in County of San Diego Code Sections 36.408 and 36.409. The probability of

construction noise impacts at any individual project site would be incrementally increased, relative to the current General Plan, at locations where the project proposes increased development density. This is due to the decreased distances between adjacent properties that would occur, moving construction on one property closer to NSLU on neighboring properties. Therefore, as a result of proposed increased density, the proposed project would cause more severe, potentially significant impacts related to temporary noise levels from construction activities compared to the prior EIRs. Therefore, this would be considered a **potentially significant** impact of the proposed project.

Nuisance Noise

Intermittent or temporary noise from sources such as amplified music, public address systems, barking dogs, landscape maintenance, or stand-by power generators are disturbing to residents but are difficult to attenuate and control. These types of noise sources would result in a significant impact if they would exceed the noise standards included in Sections 36.410, 36.413, 36.414, and 36.416 of the County Noise Ordinance. Nuisance noise impacts are more likely to occur in the more densely developed areas, where residences would be closer together and neighbors would be more likely to hear another neighbor's dog barking or music playing, for example. The proposed project would allow higher density residential development, which would have the potential to result in an increased number of nuisance noise events and of residents registering noise complaints from neighboring uses. Therefore, as a result of allowable higher density residential development, the proposed project would cause more severe, potentially significant impacts related to temporary noise levels from intermittent nuisance noise compared to the prior EIRs. Therefore, this would be considered a **potentially significant** impact of the proposed project. Any attempt to quantify the potential number of future noise complaints due to the proposed project would be highly speculative. However, continuing enforcement of the County Noise Ordinance would reduce potential nuisance noise impacts to the extent feasible.

Federal, State, and Local Regulations and Existing Regulatory Processes

The General Plan includes several policies within the Noise Element reducing the potential for the proposed project to result in a temporary increase in ambient noise levels since these policies require proposed development to comply with noise regulations, minimize recurring intermittent noise, limit use of high-noise equipment, and limit hours of operation that will minimize recurring and temporary increases in ambient noise levels. These include policies N-6.1, N-6.2, N-6.3, N-6.4, N-6.5, and N-6.6, which are summarized in Section 2.10.2, above.

In addition, the prior EIRs identified several mitigation measures addressing impacts related to temporary increases in ambient noise levels that would be applicable to the proposed project, including Noi-4.1 and Noi-4.2, which are provided in Appendix B.

Summary

The proposed project does not include any goals or policies related to temporary ambient noise levels, but General Plan policies in the Noise Element, summarized in Section 2.10.2, minimize increases in temporary ambient noise levels. However, as a result of allowable higher density residential development, the proposed project would cause more severe, potentially significant impacts related to temporary noise levels from construction activities and intermittent nuisance noise compared to the prior EIRs. Therefore, impacts to increased temporary ambient noise levels would be **potentially significant,** and mitigation is required **(Impact-NOI-4).**

2.10.3.5 Issue 5: Excessive Airport Noise Exposure

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would expose people residing or working in the project area to excessive noise levels from a private airstrip. The level of acceptable noise to new development in the vicinity of proposed new airports, active military airports being converted to civilian use, and existing civilian airports is established as an annual CNEL of 60 dBA.

Impact Analysis

The prior EIRs determined that future development would have the potential to expose NSLU to excessive noise from a private airstrip. Therefore, implementation of the 2011 General Plan and FCI GPA would result in a potentially significant impact and contribute to a potentially significant cumulative impact associated with excessive noise exposure from private airstrips. Table 2.11-20 in the2011 General Plan EIR documented one private airstrip within the Alpine CPA. However, implementation of the General Plan policies and compliance with the 1990 California Airport Noise Standards would reduce potential direct and cumulative impacts to a less than significant level.

None of the land use changes proposed as part of the project would occur close to the airfield site (the nearest proposed land use changes would be approximately 3.5 miles away). Therefore, no noise impacts related to this private airstrip would occur, and the proposed project would result in **less than significant** impacts related to excessive noise exposure from a public or private airport.

Federal, State, and Local Regulations and Existing Regulatory Processes

Federal, state, and local regulations and processes related to limiting noise exposure from airports are listed in Section 2.10.2. However, no discussion of those applicable to the proposed project are included here as airports or airstrips are within the Alpine CPA.

Summary

None of the land use changes proposed as part of the project would occur close to the airfield site. Therefore, no noise impacts related to this private airstrip would occur, and the proposed project would result in **less than significant** impacts related to excessive noise exposure from a public or private airport.

2.10.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for noise is limited to areas surrounding noise-generating sources, such as roadways, or agricultural or industrial uses because noise impacts are localized in nature. The following describes potentially significant cumulative noise impacts in the Alpine CPA vicinity and the proposed project's contribution to potential cumulative noise impacts.

2.10.4.1 Issue 1: Excessive Noise Levels

A cumulative noise impact would occur if development associated with cumulative projected growth within the Alpine CPA or directly surrounding the community (refer to Chapter 1) combined with the proposed project would exceed the standards of the General Plan Noise Element. Because the specific timelines for future construction associated with projected growth are not known, a cumulative impact

cannot be ruled out. Therefore, cumulative impacts associated with excessive noise levels from future growth and development within the cumulative study area would be potentially significant.

The proposed project would increase development and population density relative to both existing conditions and the future conditions that would occur under the current General Plan. The proposed density increases would increase potential traffic noise impacts. As a result, the future impacts under the proposed project would increase relative to those identified in the prior EIRs. As such, the proposed project would cause a more severe significant impact related to excessive transportation noise levels from roadways compared to the prior EIRs. Implementation of the General Plan policies and mitigation measures provided in Section 2.10.3.1 would reduce this impact to the extent feasible. However, given the potential increase in population density and the associated increase in traffic, it may not be possible to fully mitigate the future impacts of roadway noise at all NSLU within the Alpine CPA. Consequently, the proposed project's contribution to cumulative impacts associated with excessive noise levels would be more severe than that identified in the prior EIRs and would be cumulatively considerable. Therefore, cumulative impacts from future growth and development within the cumulative study area would result in a **potentially significant cumulative impact** and mitigation would be required **(Impact-C-NOI-1).**

2.10.4.2 Issue 2: Excessive Groundborne Vibration or Noise

A cumulative groundborne vibration impact would occur if development associated with cumulative projected growth within the Alpine CPA or directly surrounding the community would exceed the FTA and FRA guidelines for groundborne vibration and groundborne noise. Because the specific timelines for future construction are not known, a cumulative impact cannot be ruled out. Therefore, cumulative impacts from future growth and development within the cumulative study area would be potentially significant.

The proposed project would increase development and population density relative to both existing conditions and the future conditions that would occur under the current General Plan. The magnitude of individual impacts within the Alpine CPA with the proposed project would be approximately the same as those that would occur under the prior EIRs. However, with the proposed increase in development density, the likelihood of any given construction project occurring close to a sensitive receptor would generally increase, and there would be a corresponding increase in the number of potentially significant impacts. Therefore, typical construction activities have the potential to exceed vibration standards and expose vibration-sensitive land uses to excessive groundborne vibration and result in more severe impacts than identified in the prior EIRs. However, for the reasons described above, implementation of the General Plan policies and mitigation measures provided in Section 2.10.3.2 would reduce this impact to less than significant. Consequently, the proposed project's contribution to cumulative impacts associated with excessive groundborne vibration would be similar to those identified in the prior EIRs and **would not be cumulatively considerable**.

2.10.4.3 Issue 3: Permanent Ambient Noise Level Increase

A cumulative noise impact would occur if development associated with cumulative projected growth within the Alpine CPA or directly surrounding the community would result in an increase in ambient noise that would exceed the County's noise standards. Because the specific timelines for future construction associated with projected growth are not known, a cumulative impact cannot be ruled out. Therefore, cumulative impacts associated with a permanent increase in ambient noise levels from future growth and development within the cumulative study area would be significant.

To the extent that the development associated with cumulative projected growth is compatible with the land use designations proposed under the Alpine CPU, their cumulative effects are already captured in the program-level analysis and described in Section 2.10.3.3. The analysis indicated that the proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways, industrial, commercial, and agricultural land uses compared to the prior EIRs. Implementation of the General Plan policies and mitigation measures provided in Section 2.10.3.3 would reduce this impact to the extent feasible for the reasons described above; however, impacts associated with permanent noise increases would remain a potentially significant cumulative impact and would be cumulatively considerable. Consequently, the proposed project's contribution to cumulative impacts associated with permanent increase in ambient noise levels would be similar to those identified in the prior EIRs and would be a **potentially significant cumulative impact,** and mitigation would be required. **(Impact-C-NOI-2).**

2.10.4.4 Issue 4: Temporary Ambient Noise Level Increase

A cumulative noise impact would occur if construction noise or nuisance noise generated by development associated with cumulative projected growth within the Alpine CPA or directly surrounding the community would result in combined noise levels that would temporarily increase ambient noise levels beyond the standards in the County Noise Ordinance. Because these impacts are localized to the source, significant cumulative impacts would only occur if two or more projects would generate temporary noise simultaneously close to the same NSLU. Without project-specific details and specific timelines for future construction, such a cumulative impact cannot be ruled out and additional development associated with cumulative growth would have the potential to exacerbate the cumulative impacts.

The proposed project would allow higher density development, which would increase the probability of cumulative construction activities happening in proximity to NSLU. In addition, the increased density would have the potential to result in an increased number of residents registering noise complaints from neighboring uses. As a result, the future impacts under the proposed project would increase relative to those identified in the prior EIRs, and the impact would be potentially significant. Additionally, the proposed project would cause a more severe potentially significant impact related to temporary increases in ambient noise levels from construction or nuisance noise sources compared to the current General Plan. Implementation of the General Plan policies and mitigation measures provided in Section 2.10.3.4 would reduce the impacts to less than significant. Consequently, the proposed project's contribution to cumulative impacts associated with a temporary increase in ambient noise levels would be similar to those identified in the prior EIRs and **would not be cumulatively considerable**.

2.10.4.5 Issue 5: Excessive Airport Noise Exposure

As discussed in Section 2.10.1, the Alpine CPA is not currently affected by any substantial noise from airstrips located inside or outside of the Alpine CPA and the proposed project does not propose any new airstrips. As a result, impacts would be less than significant and there **would not be cumulatively considerable** impacts associated with noise exposure related to private airstrips.

2.10.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the Alpine CPA would result in potentially significant direct and cumulative noise and vibration impacts.

Impact-NOI-1: Generate Excessive Noise Levels. Due to increased development densities proposed in the Alpine CPA, as well as proposed new roadway connections, the proposed project would cause a more severe potentially significant impact related to excessive transportation noise levels from roadways compared to the prior EIRs. This would be considered a significant impact.

Impact-NOI-2: Generate Excessive Groundborne Vibration. Due to increased development densities proposed in the Alpine CPA, as well as proposed new roadway connections, the proposed project would cause more severe potentially significant impacts related to excessive groundborne vibration or groundborne noise levels from construction activity compared to the prior EIRs. This would be considered a significant impact.

Impact-NOI-3: Result in a Permanent Increase in Ambient Noise Levels. Due to increased development densities proposed in the Alpine CPA, potential new commercial uses, and proposed new roadway connections, the proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways and commercial land uses compared to the prior EIRs. This would be considered a significant impact.

Impact-NOI-4: Cause a Temporary Increase in Ambient Noise Levels. Due to increased development densities proposed in the Alpine CPA, as well as new roadway connections, the proposed project would cause more severe potentially significant impacts related to temporary increases in noise levels from construction activities and intermittent nuisance noise compared to the prior EIRs. This would be considered a significant impact.

Impact-C-NOI-1: Generate Excessive Noise Levels. The proposed project would cause more severe potentially significant impacts related to excessive noise levels from roadways compared to the prior EIRs. Consequently, the proposed project's contribution to cumulative impacts associated with excessive noise levels would be more severe than those identified in the prior EIRs and would be cumulatively considerable.

Impact-C-NOI-2: Result in a Permanent Increase in Ambient Noise Levels. The proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways, industrial, commercial, and agricultural land uses compared to the prior EIRs. Consequently, the proposed project's contribution to cumulative impacts associated with a permanent increase in ambient noise levels would be similar to those identified in the prior EIRs and would be cumulatively considerable.

2.10.6 Mitigation

2.10.6.1 Issue 1: Excessive Noise Levels

For the reasons described above, implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies presented in Section 2.10.3.1 would reduce Impact-NOI-1 and Impact-C-NOI-1 to the extent feasible, but may not mitigate the future impacts of roadway noise at all NSLU within the Alpine CPA to a less than significant level. Even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: MM-Noi-1.1 through MM-Noi-1.5, and MM-Noi-1.8 and MM-Noi-1.9 (see Appendix B).

Implementation of these mitigation measures would reduce the proposed project's impacts on excessive noise levels.

Alpine CPU Mitigation Measures

The following mitigation measure is directly related to the prior EIRs mitigation measure Noi-1.2. This new mitigation measure is provided to clarify the interpretation and intent of Noi-1.2 as it is to be applied within the Alpine CPA:

MM-NOI-1 For any new multi-family residences or mixed-use development proposed subsequent to the adoption of the Alpine CPU, private residential patios or balconies will not be required to comply with the 65 dBA (CNEL) limit, provided that all of the following criteria are met:

a) A barrier required around the patio/balcony per applicable building codes (i.e., for safety), if any, will be of solid construction with a minimum surface density of 4 pounds per square foot (e.g., concrete block, stucco, Plexiglas, or other solid material of appropriate thickness). Additional height beyond the minimum code requirement is not required.

b) The remainder of the building will be designed and constructed to limit interior noise levels to 45 dBA (CNEL) or less within private living spaces.

c) Owners of units with balconies that do not meet the 65 dBA (CNEL) limit will provide occupancy disclosure notices to all future tenants/owners regarding potential noise impacts.

2.10.6.2 Issue 2: Excessive Groundborne Vibration or Noise

For the reasons identified above, implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies identified in Section 2.10.3.2 would reduce Impact-NOI-2 to **less than significant**. Therefore, no new mitigation measures would be required.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Noi-2.2 through Noi-2.4 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts related to excessive groundborne vibration or groundborne noise.

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

2.10.6.3 Issue 3: Permanent Ambient Noise Level Increase

The proposed project would result in a potentially significant impact associated with a permanent increase in ambient noise levels. General Plan policies and mitigation measures described below have been identified that would reduce impacts associated with a permanent increase in ambient noise levels to a level below significance; however, at the time of the prior EIRs, the County determined that their implementation would be infeasible (Impact-NOI-3 and Impact-C-NOI-2). A discussion of infeasible mitigation measures, as well as General Plan policies and feasible mitigation measures, is provided below. Even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The following measure was considered in attempting to reduce impacts associated with permanent increases in ambient noise levels to below a level of significance. However, the County has determined that this measure would be infeasible, as described below. Therefore, this mitigation measure would not be implemented.

- Prohibit new roadways or roadway improvements that would result in a significant increase in the ambient noise level.

  Explanation: The measure would prohibit the construction of many roadway projects proposed in the Mobility Element because they would result in increases in ambient noise. This measure is infeasible because it contradicts an important feature of the proposed project and would restrict future development in areas identified for increased growth under the prior EIRs because new roadways to serve this growth would not be constructed. Additionally, this mitigation measure would conflict with the project objective to provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns because it would prohibit the development of new roadways.

It is noted that, while the proposed project would create one new roadway (Road 26) in Subarea 5 that would act as a new noise source, it would also make some alterations to the prior EIRs that would help to reduce traffic noise levels elsewhere in the Alpine CPA. Specifically, two roadways currently identified in the Mobility Element Network, New Road 23 (a local road from Victoria Circle to East Victoria Drive) and El Monte Road (a 2.3C Minor Collector road from Lakeside community boundary to El Capitan Reservoir) are proposed to be removed from the Mobility Element Network. It would also alter the street classifications on a number of roadways. These new classifications would all be associated with lower traffic capacities than the classifications described in the prior EIRs. Both of these changes (elimination of new roadways and reduced capacity on existing roadways) would generally reduce traffic noise adjacent to the affected roadways. Refer to Chapter 1 for a more detailed description of the Mobility Element changes proposed under the proposed project. Nonetheless the proposed creation of a new roadway means the mitigation measure would remain infeasible. Traffic volumes on some existing roadways would increase under the proposed project due to the proposed increase in development density, and impacts would remain significant and unavoidable. Chapter 5 provides a discussion of several land use alternatives to the proposed project that would result in some reduced impacts associated with a permanent increase in ambient noise levels compared to the proposed project.

2011 General Plan and FCI EIR Mitigation Measures

Mitigation measures Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3, and Noi-2.4, as described above for Issue 1, are applicable to this issue and are incorporated here by reference. In addition, the following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Noi-3.1 and Noi-3.2 (see Appendix B). The implementation of these mitigation measures, in combination with the General Plan policies identified in Section 2.10.3.3 would further reduce impacts associated with permanent increases in ambient noise levels, although not to below a significant level.

Alpine CPU Mitigation Measures

No additional feasible mitigation measures are available.

2.10.6.4 Issue 4: Temporary Ambient Noise Level Increase

Implementation of the following prior EIRs mitigation measures, in combination with the General Plan policies identified in Section 2.10.3.4, would reduce **Impact-NOI-4** to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Noi-4.1 and Noi-4.2 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's impacts related to an increase in temporary ambient noise levels.

Alpine CPU Mitigation Measures

The following mitigation measure is provided for additional abatement of temporary construction noise:

MM-NOI-2 Future discretionary projects within the Alpine CPA area shall implement best practices to reduce construction noise at nearby sensitive receptors to an average sound level of 75 dBA L_{eq} or less for an 8-hour period, between 7 a.m. and 7 p.m. Measures to reduce construction noise shall be included in the contractor specifications and may include, but are not limited to, the following:

- Limit construction activities to between 7:00 a.m. and 7:00 p.m. Monday through Saturday; no construction activities should occur at any time on Sunday or holidays (January 1, the last Monday in May, July 4, the first Monday in September, the fourth Thursday in November, and December 25). Personnel should not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours.
- Equip construction equipment with noise-reduction features such as intake silencers, mufflers, and engine shrouds that are no less effective than those originally installed by the manufacturer.
- Switch off construction equipment when it is not in use.
- Locate stationary noise-generating equipment (e.g., compressors, generators, etc.), staging areas, and laydown areas as far as possible from adjacent residential receivers.
- Prohibit haul trucks from idling on site or in the project vicinity for periods greater than 5 minutes, except as needed to perform a specified function (e.g., concrete mixing).
- Schedule high noise-producing construction activities during periods that are least sensitive, such as during daytime hours when neighboring residents are generally away at work.
- Acoustically shield stationary equipment located near residential receivers with temporary noise barriers.
- Limit on-site vehicle speeds to 15 miles per hour (mph) or less.
- Route construction-related truck traffic away from noise-sensitive areas to the extent feasible.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.

- Designate a "disturbance coordinator" who will be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler) and will require that reasonable measures be implemented to correct the problem.

2.10.6.5 Issue 5: Excessive Airport Noise Exposure

The Alpine CPA is not currently affected by any substantial noise from airstrips located inside or outside of the Alpine CPA. In addition, there are no operational airstrips within the Alpine CPA, and the proposed project does not propose any new airstrips. As a result, there would be no significant direct or cumulative noise exposure impacts related to private airstrips and impacts would be **less than significant**. Therefore, no mitigation measures are required.

2.10.7 Conclusion

2.10.7.1 Issue 1: Excessive Noise Levels

Implementation of the proposed project would increase development and population density relative to both existing conditions and the future conditions that would occur under the current General Plan. The proposed density increase would have the potential to expose land uses to more severe traffic noise levels in excess of noise compatibility guidelines than those identified in the prior EIRs. Therefore, this would be considered a new significant impact of the proposed project (Impact-NOI-1). Additionally, the proposed project would have the potential to contribute to a potentially significant cumulative impact associated with excessive noise levels and would be considered a more severe cumulative contribution of the proposed project (Impact-C-NOI-1). Although implementation of the same General Plan policies identified in Section 2.10.3.1 and the prior EIRs mitigation measures and MM-Noi-1 identified in Section 2.10.6 above would reduce the project's direct impact and contribution to a cumulative impact to the extent feasible, for the reasons described above, impacts associated with permanent noise increases would remain **cumulatively considerable** and **significant and unavoidable**. Alternatives that would further reduce this noise impact compared to the proposed project are discussed in Chapter 5.

2.10.7.2 Issue 2: Excessive Groundborne Vibration or Noise

Implementation of the proposed project would increase development density, and the likelihood of any given construction project occurring close to a sensitive receptor would generally increase; thus, a corresponding increase would occur in the number of potential significant impacts compared to the prior EIRs. Therefore, the proposed project would cause more severe potentially significant impacts related to excessive groundborne vibration from construction activity or extractive operations. This would be considered a new significant impact of the proposed project (Impact-NOI-2). However, for the reasons described above, implementation of the same General Plan policies identified in Section 2.10.3.2 and the prior EIRs mitigation measures identified in Section 2.10.6 above would reduce the impacts to **a less than significant** level. Also, the proposed project's contribution to cumulative impacts associated with excessive groundborne vibration would be similar to those identified in the prior EIRs and **would not be cumulatively considerable.**

2.10.7.3 Issue 3: Permanent Ambient Noise Level Increase

Implementation of the proposed project would result in higher development density in the Alpine CPA, which would increase traffic volumes on many roads. The overall impacts related to traffic noise increases

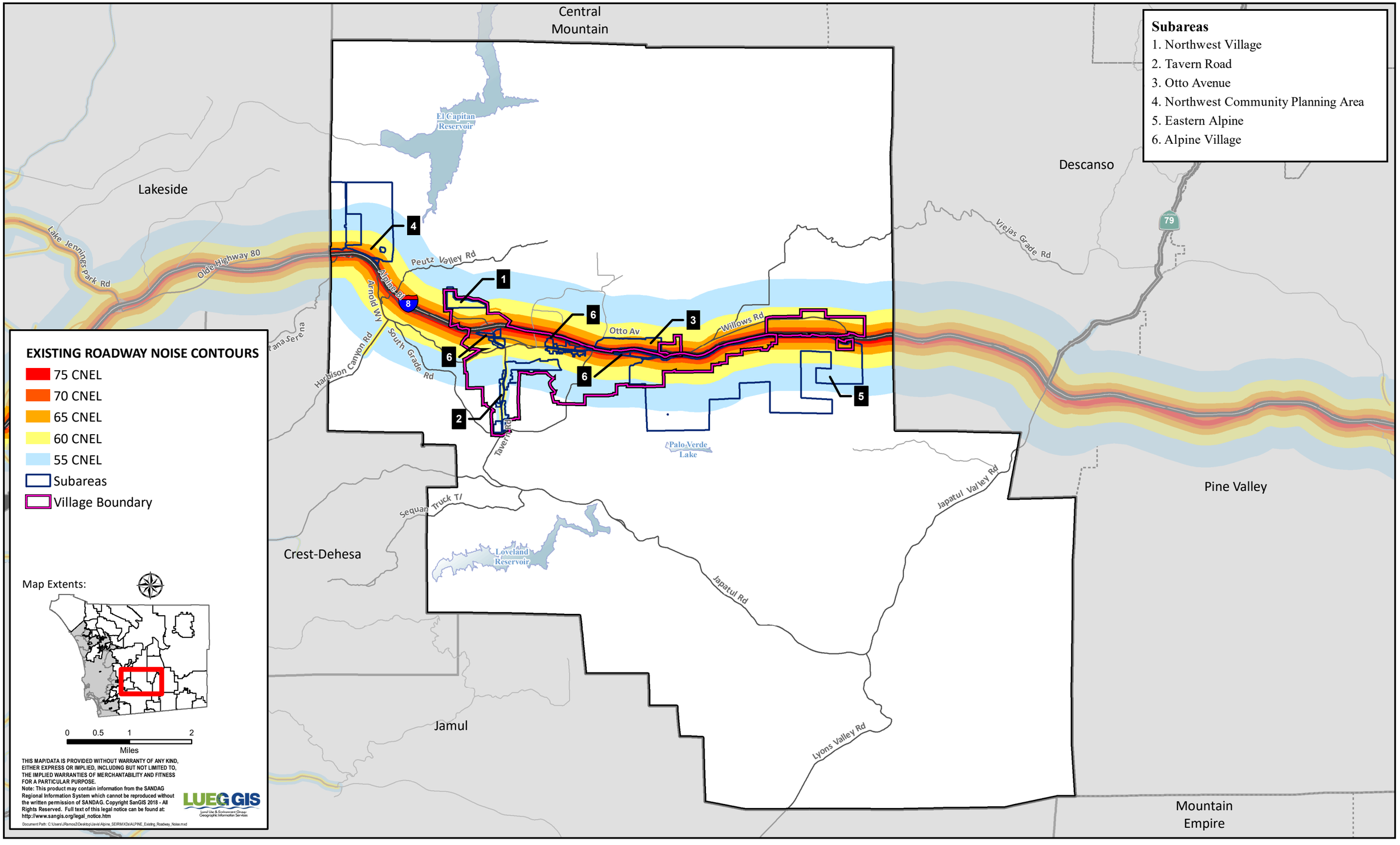
would be greater than those described in the prior EIRs. In addition, the proposed project would permit increased residential development, including in proximity to industrial zones and potential agricultural activity, as well as new designated commercial zones, which have the potential to increase ambient noise levels. Therefore, the proposed project would cause more severe potentially significant impacts related to permanent increases in noise levels from roadways, industrial, commercial, and agricultural land uses compared to the prior EIRs (Impact-NOI-3). Additionally, the proposed project would have the potential to contribute to a potentially significant cumulative impact associated with permanent increases in ambient noise levels and would be considered a more severe cumulative contribution of the proposed project (Impact-C-NOI-2). Although implementation of the same General Plan policies identified in Section 2.10.3.3 and prior EIRs mitigation measures identified in Section 2.10.6 above would reduce the project's direct impact and contribution to a cumulative impact to the extent feasible, for the reasons described above, impacts associated with permanent noise increases would remain **cumulatively considerable** and **significant and unavoidable.**

2.10.7.4 Issue 4: Temporary Ambient Noise Level Increase

Implementation of the proposed project would have the potential to temporarily increase ambient noise from construction activity as well as other sources of temporary or nuisance noise. Therefore, the proposed project would cause more severe potentially significant impacts related to temporary increases in ambient noise levels than those identified in the prior EIRs (Impact-NOI-4). However, for the reasons described above, implementation of the same General Plan policies identified in Section 2.10.3.4 and the prior EIRs mitigation measures and MM-Noi-2 identified in Section 2.10.6 above would reduce the impacts to a **less than significant** level. Also, the proposed project's contribution to cumulative impacts associated with excessive noise levels would be similar to those identified in the prior EIRs and **would not be cumulatively considerable.**

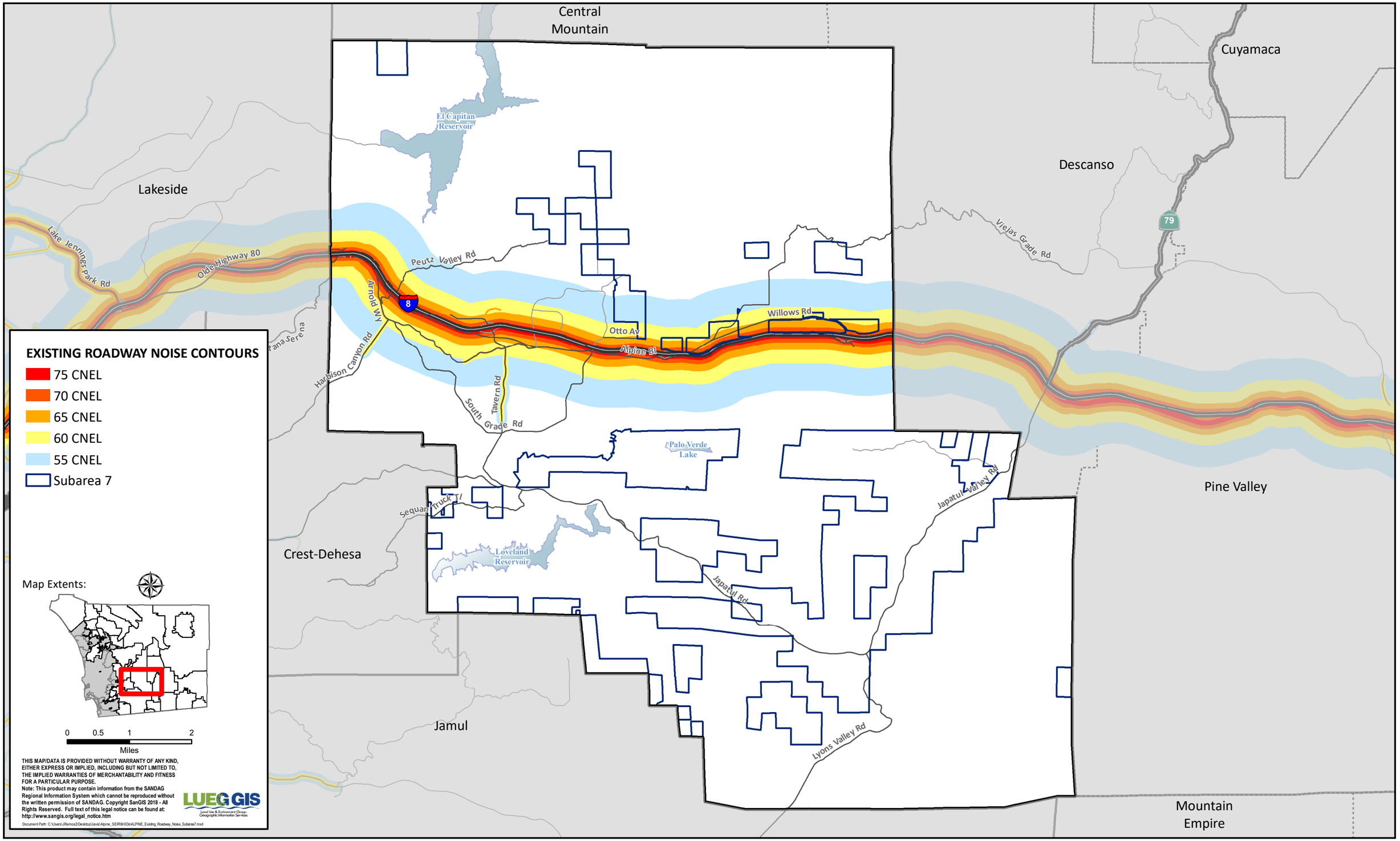
2.10.7.5 Issue 5: Excessive Airport Noise Exposure

As discussed in Section 2.10.1, the Alpine CPA is not currently affected by any substantial noise from airstrips located inside or outside of the Alpine CPA. In addition, no operational airstrips are within the Alpine CPA, and the proposed project does not propose any new airstrips. As a result, no direct or cumulative noise exposure related to private airstrips would occur. Therefore, there would be **less than significant** noise impacts related to this private airstrip, and the proposed project would not cause any significant impacts related to noise exposure from private airstrips.



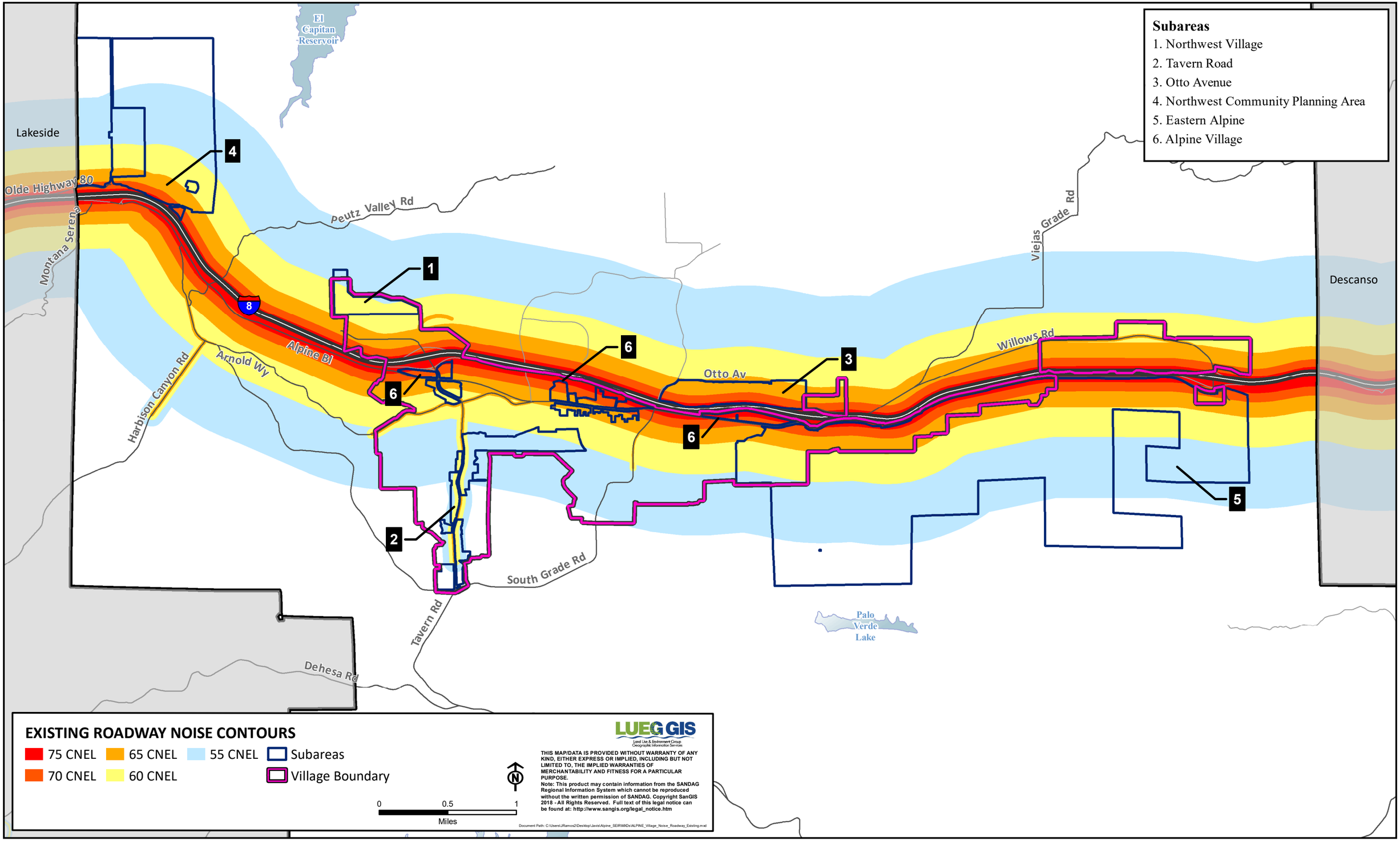
Source: SanGIS, County of San Diego, 2020

Figure 2.10-1a
Existing Noise Contours Alpine CPA
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.10-1b
Existing Noise Contours Alpine CPA
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.10-1c
Existing Noise Contours Alpine Village
Subareas 1-6

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2.11 Public Services

This section addresses public services provided within the Alpine Community Plan Area (CPA), including fire protection, police protection, schools, and libraries. This section discusses existing services and any impacts on the physical environment that would occur due to an increased need for public services resulting from the proposed project.

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this Supplemental Environmental Impact Report (SEIR) provides a background for both EIRs. The General Plan EIR analyzed the entirety of the Alpine CPA with the exception of the FCI lands, which were subsequently analyzed under the FCI EIR.

Table 2.11-1 summarizes the impacts and mitigation measures for the proposed project, as identified in this section.

Table 2.11-1 Public Services Summary of Impacts

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
PS-1	Fire Protection Services	Less Than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
PS-2	Police Protection Services	Less Than Significant	Less than Significant	Potentially Significant	Less Than Significant
PS-3	School Services	Significant and Unavoidable	Potentially Significant	Potentially Significant	Less Than Significant
PS-4	Other Public Services (Library Facilities)	Less Than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable

Comments received in response to the Notice of Preparation (NOP) included concerns regarding the need to analyze impacts on public services. These concerns are addressed and summarized in this section. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this document.

2.11.1 Existing Conditions

2.11.1.1 Fire Protection

As shown in Figures 2.11-1a and 1b and 2.2-2a and 2b, fire protection services are provided by several agencies/fire protection districts in the Alpine CPA. The Alpine Fire Protection District (FPD) service area covers the western, central, and the Village portions of the CPA. The Lakeside FPD service area covers a small section in the western portion of the CPA north of Interstate 8. County Service Area (CSA) 135 of the County Fire Authority provides fire protection service to the majority of the CPA, including properties close to Cleveland National Forest (CNF). The United States Forest Service (USFS) is responsible for fire protection and prevention on federal lands (Federal Responsibility Areas) and private lands within the

boundaries of the CNF. USFS Alpine Forest Station 47, located between Subareas 3 and 6, provides fire protection during fire season (late summer/fall). Fire stations, including the Alpine FPD, Viejas Reservation Fire Department, and USFS stations, are identified individually in Figures 2.11-1a and 1b. Tribal reservation fire departments also provide mutual fire service assistance to unincorporated County areas that are near or bordering the reservation community area. The Viejas Reservation Fire Department provides fire protection service to their properties within the Alpine CPA.

The Alpine FPD, which provides fire protection services to Subareas 1, 2, most of 3, and parts of 5, 6, and 7 was formed on December 19, 1957, and covers 27.5 square miles. The FPD dedicated Station 17 at 1364 Tavern Road on March 17, 2006. The FPD has two structure fire engines (Type I), and one wildland fire engine (Type III), two command vehicles, two support/utility vehicles, and a multi-casualty trailer. Additionally, Station 17 also houses one Medic Unit provided by a joint operating agreement with American Medical Response, Grossmont Health Care District, and the County of San Diego (County of San Diego 2011b).

Lakeside FPD provides fire protection service to Subarea 4 and parts of Subarea 7 and covers an area of approximately 55 square miles. Lakeside FPD provides structural and wildland fire suppression; emergency medical (paramedic engine company) and rescue services; and code compliance, public service, education, and safety programs. Paramedic ambulance transportation is provided through CSA 69, which consists of Santee, Lakeside, and a limited portion of the East County FPD (County of San Diego 2011b).

One indicator to determine adequate fire protection demand is the ability to respond to every emergency within acceptable time parameters. Travel time is defined as the estimated time it will take for responding emergency personnel to reach the farthest structure in a proposed development project. Travel time is determined by measuring the most direct reliable route with consideration given to safe operating speeds for heavy fire apparatus.

As shown in Table 2.11-2, (Table S-1 of the San Diego County General Plan), there are adequate travel time standards based on land use designations and/or regional categories. Existing fire travel times within the Alpine CPA are shown in Figures 2.11-3a and 3b, and in Table 2.11-3. Table 2.11-3 also lists whether a land use within a particular subarea is currently meeting the maximum allowable travel time based on the travel time standards. The fire travel time standards per Table 2.11-2 establish a service level standard for fire and first responder emergency medical services that is appropriate to the area where a development is located. As noted in the Safety Element of the General Plan, the standards are intended to (1) help ensure development occurs in areas with adequate fire protection and/or (2) help improve fire service in areas with inadequate coverage by requiring mitigation for service-level improvements as part of project approval. Furthermore, the 'yes' or 'no' statements in Table 2.11-3 are an assessment of whether the existing and proposed land uses align with the standards.

While a 'yes,' indicates that the land use within that subarea is meeting the travel time standards, and a 'no' indicates that it is currently not meeting those standards, it should be noted that a'no' response does not necessarily indicate that an entire subarea is not meeting the standards. Even a fraction of the land use not meeting the standard results in the 'no' response for the land use within that subarea.

Table 2.11-2 Travel Time Standards for Fire Protection

Travel Time (Minutes)	Regional Category (and/or Land Use Designation)	Purpose
5	• Village (VR-2 to VR-30) and limited Semi- Rural Residential Areas (SR-0.5 and SR-1) • Commercial and Industrial Designations in the Village Category • Development located within a Village Boundary	In general, this travel time standard applies to the County's more intensely developed areas, where resident and business expectations for service are the highest.
10	• Semi-Rural Residential Areas (>SR-1 and SR-2 and SR-4) • Commercial and Industrial Designations in the Semi-Rural Category • Development located within a Rural Village Boundary	In general, this travel time provides a moderate level of service in areas where lower-density development, longer access routes, and longer distances make it difficult to achieve shorter travel times.
20	• Limited Semi-Rural Residential Areas (>SR-4, SR-10) and Rural Lands (RL-20) • *All* Commercial and Industrial Designations in the Rural Category	In general, this travel time is appropriate for very low- density residential areas, where full-time fire service is limited and where long access routes make it impossible to achieve shorter travel times.
>20	• Very-low rural land densities (RL-40, RL-80)	Application of very-low rural land densities mitigate the risk associated with wildfires by drastically reducing the number of people potentially exposed to this hazard. Future subdivisions at these densities are not required to meet a travel time standard. However, independent fire districts should impose additional mitigation requirements on development in these areas.

Source: County of San Diego 2011a (Safety Element)

Table 2.11-3 Existing Fire Travel Time Standards within the Alpine CPA Subareas

Alpine CPA Subarea	Current Land Use Designation	Maximum Allowable Travel Time (Minutes)[1]	Meets Current Demand/Estimated Current Travel Times (Minutes)
1	VR-7.3	5	Yes – 0 to 5
	I-1	5	Yes – 0 to 5 No – 5 to 10
2	VR-4.3	5	Yes – 0 to 5
	VR-2.9	5	Yes – 0 to 5
	VR-2	5	Yes – 0 to 5
	SR-1	5	Yes – 0 to 5
3	SR-1	5	Yes – 0 to 5 No - 5 to 10
4	SR-1	5	Yes – 0 to 5 No - 5 to 10
	SR-2	10	Yes – 0 to 5, 5 to 10 No – 10 to 20
	VR-2	5	Yes – 0 to 5 No – 5 to 10
5	Public Agency Lands	20*	Yes – 5 to 10, 10 to 20
	C- 4	5	Yes – 0 to 5, 5 to 10
	RL-40	>20	Yes – 5 to 10, 10 to 20
	SR-4	10	Yes - 5 to 10 No - 10 to 20
	VR-2	5	Yes – 0 to 5 No – 5 to 10, 10 to 20
6	C-1	5	Yes – 0 to 5
	C-4	5	Yes – 0 to 5
	SR-1	5	Yes – 0 to 5
	VR-15	5	Yes – 0 to 5
	P/SP	20*	Yes – 0 to 5
7	P/SP	20*	Yes – 10 to 20
	C-4	5 to 10 (Subarea 7 includes Village and Semi-rural regional categories)	Yes – 5 to 10 No - 10 to 20
	RL-20	20	Yes – 10 to 20 No - +20
	RL-40	>20	Yes – 0 to 5, 5 to 10, 10 to 20, +20
	RL-80	>20	Yes – 10 to 20
	SR-1	5	Yes – 0 to 5

[1] Based on County of San Diego General Plan Safety Element Table S-1

Alpine CPA Subarea	Current Land Use Designation	Maximum Allowable Travel Time (Minutes)[1]	Meets Current Demand/Estimated Current Travel Times (Minutes)
			No - 5 to 10
	SR-2	10	Yes – 0 to 5, 5 to 10 No - 10 to 20, +20
	SR-4	10	Yes – 0 to 5, 5 to 10 No – 10 to 20, +20
	SR-10	20	Yes – 5 to 10, 10 to 20 No - +20
	TL	Not Applicable	10 to 20
	C-5	5	No – 5 to 10, 10 to 20

Source: County of San Diego 2020

*Per correspondence with County Fire Authority in May 2020, there is no designated travel time for Tribal Lands. For land use designations that are not listed in Table S-1 of the General Plan, County Fire Authority defaults to the lot size for minimum travel time; less than 1 acre = 5 minutes, 1 acre to less than 4 acres = 10 minutes, and 4 acres or larger = 20 minutes (Sibbet, David 2020).

2.11.1.2 Police Protection

The San Diego County Sheriff's Department (SDSD) is the chief law enforcement agency serving the County of San Diego. It has a service area of approximately 4,200 square miles. The SDSD Law Enforcement Operations Command Areas have further been divided into beat districts that serve the unincorporated County. Within the Alpine CPA, police protection services are provided by the Alpine Station, and Campo, Lakeside, and Pine Valley Substations, as shown in Figures 2.11-4a and 4b. The Alpine Station provides service to all seven of the subareas where land use designations would change under implementation of the proposed project. The Alpine Station currently provides 27 sworn staff and four professional staff members and serves approximately 25,000 people (SDSD 2020). The Alpine Station handles law enforcement for the community of Alpine and oversees the Rural Law Enforcement Command. The total area of Alpine and Rural Law Enforcement Command is about 3,000 square miles with a population of approximately 25,000 people (SDSD 2018).

2.11.1.3 Schools

Public schools and educational facilities are mandated by the California Department of Education and administered by the San Diego County Board of Education and the San Diego County Office of Education. The service boundaries of five public elementary school districts (Alpine, Cajon Valley, Dehesa, Jamul-Dulzura, and Lakeside) fall within the Alpine CPA. Elementary school districts are shown in Figures 2.11-5a and 5b. The Alpine Union School District provides school services to Subareas 1, 2, 3, 5, and 6; Subarea 4 is within the Cajon Valley Union School District and Lakeside Union School District. The Dehesa Union School District serves Subareas 2 and 7. The Alpine CPA is entirely within the boundaries of the Grossmont Union High School District (GUHSD) for high school students, as shown in Figures 2.11-6a and 6b. Subarea 7 is located within the Dehesa, Jamul-Dulzura, and Lakeside elementary school district boundaries. Existing student enrollment for each school district, as well as the number of schools in each district and within the CPA, are identified in Table 2.11-4.

Table 2.11-4 School Enrollment for Districts Serving the Alpine CPA Subareas

District	Subareas	Number of Schools in District	Number of Schools in CPA	Total Existing Enrollment (2018-2019)	Capacity[2, 3]
Alpine Union Elementary	1, 2, 3, 5, 6	6	5	1,612	4,000
Cajon Valley Union	4	30	1	17,468[1]	–
Dehesa Union	2, 7	11	1	11,706	–
Grossmont Union High	1, 2, 3, 4, 5, 6, 7	18	0	21,342	29,174
Jamul-Dulzura Union Elementary	7	4	0	750	–
Lakeside Union Elementary	4, 7	13	0	5,529	–

[1] Includes students enrolled at Design Learning Academy, which is a home school and online learning program.
[2] Capacity information could not be provided by Cajon Valley Union School Districts.
[3] Capacity information provided by Grossmont Union High School District.
Sources: CDE 2020; Graves pers. comm. 2018; Wright pers. comm. 2019

2.11.1.4 Libraries

The San Diego County Library (SDCL) system serves over one million residents in the County's unincorporated communities. In 1996, the Board of Supervisors (BOS) adopted recommended Standards of Library Service. The minimum space service goal for the San Diego County Library system is 0.5 square feet per capita (County of San Diego 2011a).

Library service areas within the Alpine CPA include Alpine, Campo, Crest, Descanso, East Bookmobile, El Cajon, Lakeside, Pine Valley, and Rancho San Diego, as shown in Figures 2.11-7a and 7b. All subareas, except for Subarea 4 and parts of Subarea 7, fall within the Alpine Branch's library service area.

Subarea 4 falls within the Lakeside library service area. The closest library to the seven subareas is the recently constructed Alpine Branch Library, a 12,700-square-foot facility that opened in August 2016 at 1752 Alpine Boulevard.

2.11.2 Regulatory Framework

Sections 2.11 and 2.13, *Public Services*, of the prior EIRs include a discussion of regulatory framework related to public services in the unincorporated County. Regulations described in the prior EIRs are the same as those evaluated in this SEIR, with the exception of Senate Bill (SB) 50 and updates to California Code of Regulations (CCR), Title 24, Parts 2 and 9, and the County of San Diego Consolidated Fire Code. Summaries of these regulations are provided below, as well as a list of the applicable regulations described in the prior EIRs for reference. No changes to those regulations have been identified that would alter the conclusions from the prior EIRs. All regulations used from the prior EIRs were reviewed to ensure they are still valid and are incorporated by reference.

Applicable state regulations include:

- California Health and Safety Code (Section 13000 et seq.)

- California Public Resources Code Sections 4201–4204
- State Responsibility Areas Fire Regulations (Title 14 Natural Resources, Department of Forestry Fire Protection)
- Subdivision and Fire Hazards Bill (Assembly Bill [AB] 2447)
- California Department of Education
- AB 16
- California Public Schools Accountability Act of 1999.

Applicable local regulations include:

- County of San Diego Consolidated Fire Code
- San Diego County BOS' Policy I-84, Project Facility Availability and Commitment for Public Sewer, Water, School and Fire Services
- Proposition U: School Bonds, Grossmont Union High School District.

In addition to the above, the following state and local regulations have been adopted/updated since adoption of the prior EIRs.

2.11.2.1 Senate Bill 50 (Statutes of 1998), State School Funding, Education Code Section 17620

California Education Code 17620 establishes the authority of any school district to levy a fee, charge, dedication, or other requirements against any development within the school district for the purposes of funding the construction of school facilities, as long as the district can show justification for the fees. SB 50, adopted in 1998, limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules.

2.11.2.2 California Code of Regulations Title 24, Parts 2 and 9, California Building Code

CCR Part 2 of Title 24 refers to the regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 2 is preassembled with the 2015 International Building Code with necessary California amendments. Part 9 refers to the California Fire Code, which contains fire safety-related building standards referenced in other parts of Title 24. The California Fire Code is preassembled with the 2015 Edition of the International Fire Code with necessary California amendments.

2.11.2.3 County of San Diego Consolidated Fire Code

California Health and Safety Code Section 13869.7(a) provides that a fire protection district organized pursuant to Division 12 of the code may adopt building standards relating to fire and panic safety that are more stringent than the building standard adopted by the State Fire Marshal and contained in California Building Code standards. Section 13869.7(c) requires a fire protection district to transmit its adopted ordinance to the county where the ordinance will apply and allows the legislative body of a county to ratify, modify or deny an adopted fire protection district ordinance. The fire protection districts within the boundaries of San Diego County collaborated to adopt the 2016 California Fire Code. The 2017 Consolidated Fire Code is based upon the County's 2017 Fire Code as currently amended and adopted in Title 9, Division 6, Chapter 1 of the County Code, subject to the modifications of each fire protection district

to the California Building Code standards based upon their respective determinations as to what modifications are reasonably necessary because of local climatic, geological and topographical conditions within the district.

2.11.2.4 County of San Diego General Plan Policies

There are specific General Plan policies and goals found in the Land Use and Safety Elements intended to address public services.

Land Use Element

Goal LU-12 provides for adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development. This is accomplished by policies LU-12.1 through LU-12.4, which require the provision of infrastructure, facilities, and services needed by new development prior to that development, require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses, provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities, and plan and site infrastructure for public utilities and public facilities in a manner compatible with community character.

Safety Element

Goal S-2 is for effective emergency response and is accomplished through policies S-2.1 through S-2.6. These policies require emergency management system training, familiarity with national and state response plans, emergency and disaster education programs, flood warning systems and evacuation plans for areas already developed in the 100-year flood zones, and effective emergency evacuation programs. Goal S-3 is for minimized fire hazards and is accomplished by policies S-3.1 through S-3.7, which require defensible development, fire protection measures, access roads, and development in hillsides and canyons be designed to minimize risks. Specifically, policy S-3.4 is for service availability, and requires development be planned where fire and emergency services are available or planned. Goals S-5 and S-6 require regional fire protection and adequate fire and medical services. These are accomplished through policies S-5.1 through S-6.5 which require regional coordination among fire protection agencies and coordination with fire service providers to improve services.

Goal S-12 is for adequate law enforcement facilities and is accomplished through policy S-12.1, which coordinates new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services. Goal S-13 is for safe communities, including law enforcement facilities and services that help maintain safe communities. This is accomplished by policies S-13.1 and S-13.2, which locate sheriff facilities to best serve existing and planned development and locate future Sheriff stations in non-residential areas. Goal S-14 is crime prevention, and is accomplished through policy S-14.1, which requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel when feasible.

2.11.2.5 Alpine CPU Policies

The Alpine CPU includes two goals applicable to public services as described below:

Land Use Element

Goal LU-9 in the Land Use Element supports the establishment of a high school in Alpine.

Safety Element

The Safety Element Goal S-1 includes promoting the establishment of emergency procedures and preventative measures to minimize damage from fire and crime occurrence. Policy S-1.3 promotes the expansion of fire, police, and emergency health or other services, as needed.

2.11.3 Analysis of Project Effects and Determination as to Significance

Based on guidance provided in Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, travel times or other performance objectives for any of the following public services:

- Fire Protection
- Police Protection
- Schools
- Other public facilities

2.11.3.1 Issue 1: Fire Protection Services

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant impacts associated with the increased demand for the provision of new or physically altered fire protection facilities. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to a potentially significant cumulative impact associated with fire protection services. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies that require CEQA review for new public facilities, development impact fees, and coordination with other jurisdictional agencies to identify methods to minimize fire protection services impacts associated with future development.

Implementation of the proposed project would change land use designations in four of the seven subareas, resulting in increased density and mobility network changes, and the potential need for new or physically altered fire protection facilities. In addition, to promote the expansion of fire protection services under policy S-3 described above, there is the potential need for new or expanded fire protection facilities. The construction of these facilities would potentially have adverse environmental impacts. Future development would require CEQA review for new public facilities, development impact fees, and coordination with other jurisdictional agencies to identify methods to minimize fire protection services impacts.

Travel times from the closest fire station to future development associated with the proposed project would be required to achieve the standards identified in Table S-1 of the County's General Plan Safety Element. Implementation of the proposed project would establish similar travel time standards associated with the proposed land uses. Similar to existing standards, densely populated areas (i.e., SR-2 or denser) would have travel time standards of 10 minutes or less, while rural areas, such as limited semi-rural residential (SR-10) or rural residential (RL-20), would have travel time standards of 20 minutes. Additionally, an extremely rural area (RL-80) would have a travel time standard of more than 20 minutes. As shown in Table 2.11-3, fire protection districts are currently not meeting travel time standards for existing land use designations within various subareas.

The fire travel time standards per Table 2.11-2, above, establish a service level standard for fire and first responder emergency medical services that is appropriate to the area where a development is located. As noted in the Safety Element of the General Plan, the standards are intended to (1) help ensure development occurs in areas with adequate fire protection and/or (2) help improve fire service in areas with inadequate coverage by requiring mitigation for service-level improvements as part of project approval. Furthermore, the 'yes' or 'no' statements in Tables 2.11-3 and 2.11-5 are an assessment of whether the existing and proposed land uses, respectively, align with the standards.

Table 2.11-5 Estimated Future Fire Travel Times within the Alpine CPA Subareas

Alpine CPA Subarea	Proposed Land Use Designation	Maximum Allowable Travel Time (Minutes)[2]	Meets Future Demand/Estimated Future Travel Times (Minutes)[3]
1	VR-7.3	5	Yes - 0 to 5
	I-1	5	Yes - 0 to 5 No - 5 to 10
2	VR-7.3	5	Yes - 0 to 5
	VR-10.9	5	Yes - 0 to 5
	C-3	5	Yes - 0 to 5
3	SR-1	5	Yes - 0 to 5
4	C-5	5	Yes - 0 to 5
	C-3	5	Yes - 0 to 5
	SR-0.5	5	Yes - 0 to 5 No - 5 to 10 No - 10 to 20
5	C-1	5	Yes - 0 to 5
	PAL	20*	Yes – 0 to 5, 5 to 10
	C- 4	5	Yes - 0 to 5
	RL-20	20	Yes - 0 to 5
	RL-40	>20	Yes – 0 to 5, 5 to 10, 10 to 20
	SR-1	5	Yes – 0 to 5
	SR-10	20	Yes - 0 to 5
	SR-4	10	Yes – 0 to 5

[2] Based on County of San Diego General Plan Safety Element Table S-1

[3] Calculations for travel times assume expanded fire services within the eastern Alpine area.

Alpine CPA Subarea	Proposed Land Use Designation	Maximum Allowable Travel Time (Minutes)[2]	Meets Future Demand/Estimated Future Travel Times (Minutes)[3]
	VR-2	5	Yes - 0 to 5 No - 5 to 10
6	C-5	5	Yes - 0 to 5 No – 5 to 10
7	P/SP	20*	Yes - 10 to 20
	C-4	5 to 10 (Subarea 7 includes Village and Semi-Rural regional categories)	Yes – 0- to5, 5 to 10 No - 10 to 20, +20
	RL-20	20	Yes - 10 to 20 No - +20
	RL-40	>20	Yes - 0 to 5, 5 to 10, 10 to 20, +20
	RL-80	>20	Yes - +20
	SR-1	5	Yes - 0 to 5
	SR-2	10	Yes - 0 to 5, 5 to 10 No - 10 to 20, +20
	SR-4	10	Yes - 0 to 5, 5 to 10 No - 10 to 20
	SR-10	20	Yes - 5 to 10, 10 to 20 No - +20
	TL	Not Applicable*	5 to 10
	C-5	5	Yes – 0 to 5 No - 5 to 10

Source: County of San Diego 2020
C = Commercial
I = Industrial
PAL = Public Agency Lands
P/SP = Public/Semi-Public Facilities
RL = Rural Lands
SR = Semi-Rural
TL = Tribal Lands
C-5= VCMU = Village Core Mixed Use
VR = Village Residential
*Per correspondence with County Fire Authority in May 2020, there is no designated travel time for Tribal Lands. For land use designations that are not listed in Table S-1 of the General Plan, County Fire Authority defaults to the lot size for minimum travel time; less than 1 acre = 5 minutes, 1 acre to less than 4 acres = 10 minutes, and 4 acres or larger = 20 minutes (Sibbet pers. comm. 2020).

Federal, State, and Local Regulations and Existing Regulatory Processes

Existing regulations listed above in Section 2.11.2, *Regulatory Framework,* are applicable to fire protection services. This includes the California Health and Safety Code, which regulates fire protection standards in buildings; CCR Title 24, which contains fire and life safety regulations and general construction building standards; the County Consolidated Fire Code, which guides fire protection standards within the County; and BOS Policy I-84, which enforces the requirement that development projects include in their applications the necessary availability and commitment letters demonstrating sufficient fire service

availability with adequate travel time verified between the available facilities and the most distant habitable structure in the project. These regulations would reduce impacts associated with increased demand for fire protection services, necessitating the construction of new or expanded fire protection facilities.

The General Plan includes several policies that would reduce the potential for the proposed project to result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities because these policies require proposed development to implement design features and measures that will minimize impacts associated with the provision of new or physically altered fire protection facilities. These policies are summarized in Section 2.11.2 above.

In addition, the prior EIRs identified several mitigation measures addressing impacts related to adverse physical impacts associated with the provision of new or physically altered fire protection facilities that would be applicable to the proposed project, including Pub-1.1 through Pub-1.9, which are provided in Section 2.11.6, *Mitigation*.

Summary

The proposed project would result in **potentially significant impacts.** Although compliance with General Plan policies and prior EIRs mitigation measures would reduce the proposed project's impacts related to the provision of new or physically altered fire protection facilities, to maintain acceptable travel times, the construction or expansion of new fire facilities would be required, which would have the potential to result in substantial adverse impacts on the environment. This would be considered a more severe **potentially significant** impact compared to the prior EIRs and mitigation would be required (**Impact-PS-1**).

2.11.3.2 Issue 2: Police Protection Services

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant impacts associated with the increased demand for expanding and constructing new facilities for police protection services. The discussion of impacts related to the provision of new or physically altered police facilities needed to maintain acceptable service ratios, response times, or other performance objectives for police protection services from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.11 and 2.13, *Public Services*, of the prior EIRs and is incorporated by reference.

In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to cumulative impacts associated with police facilities. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies because they would require proposed development to implement design features and measures (e.g., village expansion design, providing infrastructure and services compatibility, and planning for compatibility) that would minimize impacts associated with the provision of new or physically altered police facilities.

The SDSD staffing goals and facility plans are based upon population. Generally, SDSD has a goal of providing one patrol position per 10,000 residents. Travel time standards are typically applied in a facility-based model where the emergency services always start at a defined point (i.e., a fire station). SDSD does not have adopted travel time standards because deputies respond to calls for service while they are already out on patrol and the travel time will vary depending on several factors, such as the deputy's current location, his/her availability (e.g., he/she may already be working on a higher priority call), and the type of call (County of San Diego 2011a).

To promote the expansion of police protection services under Safety Element policy S-1.3 described above, there would be the potential need for new or expanded police protection facilities, the construction of which would potentially have adverse environmental impacts. Future development would require CEQA review on new public facilities, development impact fees, and coordination with other jurisdictional agencies to identify methods to minimize impacts related to expanding and constructing new facilities.

Implementation of the proposed project would change land use designations within four of seven subareas within the Alpine CPA. Population growth associated with future development would potentially result in a need for increased police services, including the potential need for the construction of new or expanded police facilities, in order to maintain levels of service.

The Alpine Station currently provides 27 sworn staff and four professional staff members and serves approximately 25,000 people (SDSD 2020). The existing number of patrol officers currently meets the SDSD goal. The proposed project would result in the development of 6,078 dwelling units (2,013 additional dwelling units from what was approved under the current General Plan). The additional growth would not result in the need for additional police staff, as the current goal of one staff per 10,000 residents would continue to be met. In addition, patrol officers are mobile, and even if new staff were hired, new or expanded police facilities would not be required. Therefore, while the proposed project would increase the population within the Alpine Station service area from what was anticipated in the current General Plan, no new or expanded police facilities would be required. Impacts would be similar to those identified in the prior EIRs and would be **less than significant (Impact-PS-2)**. Therefore, no mitigation measures are required.

Federal, State, and Local Regulations and Existing Regulatory Processes

Although the proposed project would not directly result in a need for new or expanded police facilities, goal S-1.3 refers to promoting the expansion of police facilities as needed. New or expanded facilities proposed under the County's jurisdictional authority are typically required to obtain a Site Plan or Major Use Permit. Per Section 1006.b of the County's Zoning Ordinance, the development, use, or improvement of new or existing County facilities including sheriff stations is not subject to the Zoning Ordinance and these permit types are not required. However, new or expanded facilities, including modifications, would be subject to CEQA and subsequent analysis would be required. In addition, these facilities would be required to comply with applicable regulations protecting environmental resources, such as the Noise Ordinance; the Resource Protection Ordinance, which helps protect sensitive lands and prevent their degradation; and the Watershed Protection Ordinance. Therefore, compliance with these regulations would reduce impacts associated with any future construction of new or expanded police protection facilities.

In addition, the General Plan includes several policies that would reduce the potential for substantial adverse physical impacts associated with the provision of new or physically altered police facilities. These policies require proposed development to implement design features and measures (e.g., village expansion design, providing infrastructure and services compatibility, and planning for compatibility)

that would minimize impacts associated with the provision of new or physically altered police facilities should they be required in the future. These policies are described above in Section 2.11.2.

Summary

While the proposed project would increase the population within the Alpine Station service area from what was anticipated in the current General Plan, no new or expanded police facilities would be required. Impacts would be similar to those identified in the prior EIRs and would be **less than significant (Impact-PS-2)**. Therefore, no mitigation measures are required.

2.11.3.3 Issue 3: School Services

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant impacts associated with the increased demand for school services. The discussion of impacts related to the provision of new or physically altered school facilities needed to maintain acceptable service ratios or other performance objectives for schools from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.11 and 2.13, *Public Services*, of the prior EIRs and are incorporated by reference. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to a potentially significant cumulative impact associated with the physical impacts associated with the provision of new or physically altered school facilities. Impacts were determined to be potentially significant and unavoidable, even with implementation of mitigation measures and General Plan policies, because projects proposing the construction or expansion of school facilities would be approved by the individual school districts and would not be subject to discretionary approval or oversight by the County.

Implementation of the proposed project would change land use designations within four of seven subareas in the Alpine CPA, which has the potential to increase density. Increased density would result in student population growth, which could require new or expanded school facilities, the construction of which would potentially have adverse environmental impacts.

Five public elementary school districts and one high school district serve the Alpine CPA. The location of these districts is shown in Figures 2.11-5a and 5b and 2.11-6a and 6b. Population growth associated with increased density may be partially offset with funding for school facilities from new development. Under SB 50 (Chapter 407, Statutes of 1998), a school district may levy impact fees on new development to mitigate potential impacts of the development on school facilities, and payment of these fees is considered "full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities" (California Government Code Section 65995). Appropriate development impact fees are determined using development impact fee justification studies or reports.

Student generation rates represent the average number of students per home and are used to determine the number of potential students that could be generated by residential development. Table 2.11-6

identifies the student generation rates for the districts that serve the CPA, as well as the number of potential students and proposed number of dwelling units for these school districts.

Table 2.11-6 Student Generation Rates

School District	Housing Type	Number of Potential Dwelling Units	Student Generation Rate	Number of Potential Students
Alpine Union Elementary 1,2,3,5,6	Single-Family	807	0.23 (K–5th grade)	186
			0.134 (6th–8th grade)	108
	Multi-Family	1,556	0.98 (K–5th grade)	1,525
			0.077 (6th–8th grade)	120
Cajon Valley Union 4	Single-Family	736	0.23 (K–5th grade)	169
			0.134 (6th–8th grade)	98
	Multi-Family	116	0.98 (K–5th grade)	114
			0.077 (6th–8th grade)	9
Dehesa Union 2,7	Single-Family	658	0.23 (K–5th grade)	151
			0.134 (6th–8th grade)	88
	Multi-Family	3299	0.23 (K–5th grade)	759
			0.134 (6th–8th grade)	442
Grossmont Union High 1,2,3,4,5,6,7	Single-Family	2046	0.146	299
	Multi-Family	4032	0.137	552
Jamul-Dulzura Union Elementary 7	Single-Family	503	0.23 (K–5th grade)	116
			0.134 (6th–8th grade)	67
	Multi-Family	2360	0.23 (K–5th grade)	543
			0.134 (6th–8th grade)	316
Lakeside Union Elementary 4,7	Single-Family	1239	0.23 (K–5th grade)	285
			0.134 (6th–8th grade)	166
	Multi-Family	2476	0.23 (K–5th grade)	569
			0.134 (6th–8th grade)	332

Sources: California Department of Education 2020; GUHSD 2019
Note: Student generation rates identified by Cajon Valley Union Elementary District were used for Alpine Union Elementary.

As shown in Table 2.11-6, school districts serving the subareas would experience increases in both potential dwelling units and population growth with implementation of the proposed project. Based on student generation rates provided by the school districts that serve the subareas, the proposed project would result in an increased number of students in each of the districts serving the subareas. While these students would be distributed across the various schools and districts, it cannot be determined at this time exactly how many additional students would attend each individual school or district.

Future development associated with the proposed project would increase the student population, resulting in additional school enrollment from what was anticipated in the prior EIRs. To maintain acceptable service ratios, new or expanded school facilities would potentially be required. However, the planning, design, approval, and construction of school facilities is not within the County's jurisdiction; it is the responsibility of the individual school districts. Proposed charter schools under the school district's jurisdiction within the Alpine CPA would be required to comply with the same process, including planning, design, approval, and construction, through the local school district. Proposed charter schools under the County's land use jurisdiction would be required to obtain permits from the County rather than the school district. The school district would be responsible for the potential expansion or development of new school district facilities. The construction of any future high school would be required to adhere to all applicable laws and regulations, and would be subject to environmental review by GUHSD, which would serve as the CEQA lead agency that would be responsible for its approval and implementation. Impacts would be **potentially significant** and mitigation is required **(Impact-PS-3)**.

Federal, State, and Local Regulations and Existing Regulatory Processes

Existing regulations listed above in Section 2.11.2 are applicable to school facilities. Compliance with existing regulations, such as the BOS Policy-184, which enforces the County requirement that development projects include in their applications the necessary availability and commitment letters demonstrating sufficient school service availability would reduce impacts associated with increased student populations that necessitate the construction of new or expanded school facilities. Additionally, SB 50 revised development fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The statutory fees are the exclusive means of considering and mitigating school impacts. SB 50 limits the mitigation that may be required to the scope of the review of a project's impacts to schools, and the findings for school impacts. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules. Payment of the statutory fee would mitigate the impact because of the provision that the statutory fees constitute full and complete mitigation.

The current General Plan includes several policies that would reduce the potential for the proposed project to result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities because these policies require proposed development to implement design features and measures (e.g., village expansion and town center planning and design, providing infrastructure and services compatibility, planning for compatibility, planning for schools) that will minimize impacts associated with the provision of new or physically altered school facilities. These policies are summarized above in Section 2.11.2.

In addition, the prior EIRs identified several mitigation measures addressing impacts related to school facilities that would be applicable to the proposed project, including Pub- 1.1, Pub-1.2, Pub-1.3, Pub-3.1, and Pub-3.2, which are provided in Section 2.11.6.

Summary

Implementation of the General Plan policies and prior EIRs mitigation measures, in addition to implementation of existing regulations such as SB 50, would reduce the proposed project's impacts (**Impact-PS-3**) associated with the provision of new or physically altered school facilities to a **less than significant** level because payment of the SB 50 statutory fee would mitigate the impact. In addition, as stated above, BOS Policy-184 enforces the County requirement that development projects include in their applications the necessary availability and commitment letters demonstrating sufficient school service availability and, as such, would reduce impacts associated with increased student populations that necessitate the construction of new or expanded school facilities.

2.11.3.4 Issue 4: Library Facilities

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for other public facilities.

Impact Analysis

The prior EIRs determined that future development would result in potentially significant impacts associated with the increased demand for library services. The discussion of impacts related to the provision of new or physically altered library facilities needed to maintain acceptable service ratios or other performance objectives for other public facilities from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.11 and 2.13, *Public Services*, of the prior EIRs and are incorporated by reference. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to cumulative impacts associated with library facilities. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies because these policies and measures require CEQA review on new public facilities, development impact fees, and coordination with other jurisdictional agencies to identify methods to minimize public services facilities impacts associated with future development. Future development would require CEQA review on new public facilities, development impact fees, and coordination with other jurisdictional agencies to identify methods to minimize public services impacts.

The following discussion evaluates the adequacy of public library facilities in the Alpine CPA to serve the future population associated with the proposed project. The minimum space service goal for the SDCL system is 0.5 square feet per capita. Based on the 2016 estimated population of 17,913 residents (SANDAG 2017), the library facility requirement for the Alpine CPA is 8,957 square feet. The Alpine Branch, which is approximately 12,700 square feet, serves the Alpine CPA (SDCL 2016). The current facility meets the SDCL service goal and is considered adequate to serve the community. Alpine CPA has a surplus of approximately 4,028 square feet in library facility service space based on the SDCL service goal.

Population growth associated with future development would result in a need for increased library services, including the potential need for new library facilities in order to maintain adequate service levels. Under the General Plan, approximately 4,065 dwelling units could be developed within the subareas, resulting in a potential population increase of approximately 11,341 people and an additional demand of approximately 5,894.25 square feet of library space. This additional demand would not be accommodated by the existing Alpine Branch Library.

At buildout, the proposed project would result in the addition of 6,078 dwelling units (an additional 2,013 dwelling units above the number of dwelling units approved under the General Plan), and a population increase of approximately 16,958. To continue to meet the SDCL goal of providing 0.5 square feet of library facilities per capita, approximately 8,478.5 total square feet of library space would be required to serve the entire Alpine CPA at project buildout. As such, current facilities would not be sufficient to provide library services to future populations, and new or expanded library facilities would be required to maintain SDCL's service goals. Impacts would be **potentially significant** and mitigation is required (**Impact-PS-4**).

Federal, State, and Local Regulations and Existing Regulatory Processes

Existing regulations listed above in Section 2.11.2 are applicable to the construction of new or expanded library facilities. The SDCL Strategic Plan identifies the need to develop and implement a facilities plan. New or expanded facilities proposed under the County's jurisdictional authority are typically required to obtain a Site Plan or Major Use Permit. Per Section 1006.b of the County's Zoning Ordinance, the Zoning Ordinance does not apply to the development, use, or improvement of new or existing County facilities, including libraries, fire, and sheriff stations, etc. and the permits described above would not be required. However, any new construction or modifications to existing facilities are required to comply with CEQA and subsequent analysis would be required. New or expanded facilities would be required to comply with applicable regulations protecting environmental resources, such as the Noise Ordinance; the Resource Protection Ordinance, which helps protect sensitive lands and prevent their degradation; and the Watershed Protection Ordinance, which would reduce impacts associated with increased demand for library services, necessitating the construction of new or expanded library facilities.

The General Plan includes several policies that would reduce the potential for the proposed project to result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities. These policies are summarized in Section 2.11.2, above.

In addition, the prior EIRs identified several mitigation measures addressing impacts related to the construction or expansion of library facilities that would be applicable to the proposed project, including Pub-1.1, Pub-1.2, and Pub-1.3, which are provided in Section 2.11.6.

Summary

To continue to meet the SDCL goal of providing 0.5 square feet of library facilities per capita, additional square footage of library space would be required to serve the entire Alpine CPA. As such, new or expanded library facilities would be required to maintain SDCL's service goals. Therefore, the proposed project would result in a **potentially significant** impact associated with the construction or expansion of library facilities (**Impact-PS-4**).

2.11.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for public services includes surrounding communities near the Alpine CPA, whose population is served by many individual public service providers with specific service areas, including the Alpine and Lakeside FPDs; SDSD stations including the Alpine Station and Rural Law Enforcement Command; the Alpine Union, Cajon Valley, Dehesa, Jamul-Dulzura, Lakeside, and Cajon Valley school districts, as well as GUHSD; and SDCL service areas including Alpine, Campo, Crest, Descanso, East Bookmobile, Lakeside, El Cajon, Pine Valley, and Rancho San Diego.

2.11.4.1 Issue 1: Fire Protection Services

Fire protection services within the region often cross inter-jurisdictional boundaries. A cumulative impact would occur if development associated with cumulative projected growth within the Alpine CPA or directly surrounding the community combined with the Alpine CPU would increase demand for fire protection services. Future growth and development in communities adjacent to the Alpine CPA would result in a need for additional fire protection services to serve new development. In addition, growth may occur in areas outside of the County's jurisdiction, which may result in unplanned growth that would require additional fire protection services. Cumulative growth and development in surrounding communities, such as commercial, residential, or industrial projects, would require fire protection services from fire agencies within the region. To maintain adequate travel times to serve projected growth, the construction or expansion of fire protection facilities would be required, which would have the potential to result in an adverse impact on the environment. Therefore, cumulative growth and development would result in a **potentially significant cumulative impact-(Impact-C-PS-1)** associated with the construction of fire facilities.

2.11.4.2 Issue 2: Police Protection Services

Future growth and development in communities adjacent to the Alpine CPA would require increased police protection services to serve new development. In addition, growth may occur in areas outside of the County's jurisdiction, which may result in unplanned growth that would require additional police protection services and the need for construction of new or expanded of police facilities. Cumulative growth and development, such as commercial, residential, or industrial projects, would require police services. The increase in demand for police protection services associated with cumulative growth and development would potentially result in the need for construction of new or expanded of police facilities, which would have the potential to create an adverse impact on the environment. Therefore, cumulative growth and development would result in a **potentially significant cumulative impact (Impact-C-PS-2)** associated with the construction of police facilities.

2.11.4.3 Issue 3: School Services

Future projects that involve residential development to accommodate cumulative growth would increase the public school population within the Alpine CPA or directly surrounding the community. If sufficient capacity is not available, an increase in student population would require the construction or expansion of school facilities, which would have the potential to result in adverse environmental impacts. While future projects associated with projected growth would undergo environmental review and would be required to demonstrate compliance with applicable regulations prior to project approval, the need for school facilities would incrementally increase and would have the potential to result in a significant cumulative impact. Therefore, cumulative growth and development would result in a **potentially significant cumulative impact (Impact-C-PS-3)** associated with the construction of school facilities.

2.11.4.4 Issue 4: Library Services

The SDCL serves the entire unincorporated County and portions of surrounding incorporated cities. Future projects that involve residential development to accommodate cumulative growth would increase the population of library users, potentially resulting in the need to construct new or expanded library facilities that could result in significant environmental impacts. While future projects associated with projected growth would undergo environmental review and would be required to demonstrate compliance with applicable regulations prior to project approval, they would incrementally increase the

need for library facilities, which would have the potential to result in a significant cumulative impact. Therefore, cumulative growth and development would result in a **potentially significant cumulative impact (Impact-C-PS-4)** associated with the construction of library facilities.

2.11.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potentially significant direct and cumulative impacts related to the provision of new or physically altered fire, police protection, school, and library facilities. The following summarizes the potentially significant project-level and cumulative impacts that would result from implementation of the proposed project prior to mitigation.

Impact-PS-1: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Fire Protection Facilities. Due to increased development densities proposed, the proposed project would cause a more severe potentially significant impact related to the construction of fire protection facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact-PS-2: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Police Facilities. While the proposed project would increase the population within the Alpine Station service area from what was anticipated in the current General Plan, no new or expanded police facilities would be required. Impacts would be less than significant.

Impact-PS-3: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered School Facilities. Due to increased development densities proposed, the proposed project would cause more severe potentially significant impacts related to the construction of school facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact-PS-4: Result in Adverse Physical Impacts Associated with the Provision of New or Physically Altered Library Facilities. Due to increased development densities proposed, the proposed project would cause more severe potentially significant impacts related to the construction of library facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact-C-PS-1: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Fire Protection Facilities. The proposed project would cause a more severe potentially significant impact related to fire protection facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be potentially cumulatively considerable.

Impact-C-PS-2: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Police Protection Facilities. The proposed project would cause a more severe potentially significant impact related to police protection facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be potentially cumulatively considerable.

Impact-C-PS-3: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered School Facilities. The proposed project would cause a more severe potentially significant impact related to school facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be potentially cumulatively considerable.

Impacts C-PS-4: Result in a Cumulatively Considerable Contribution Associated with Adverse Physical Impacts Associated with the Provision of New or Physically Altered Library Facilities. The proposed project would cause a more severe potentially significant impact related to library facilities compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be potentially cumulatively considerable.

2.11.6 Mitigation

2.11.6.1 Issue 1: Fire Protection Services

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs mitigation measures MM-Pub-1.1 through MM-Pub-1.9 would reduce **Impact-PS-1 and C-PS-1.** However, even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Pub-1.1 through Pub-1.9 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to fire protection services.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.11.6.2 Issue 2: Police Protection Services

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, implementation of the following prior EIRs mitigation measures in combination with the General Plan policies presented in Section 2.11.3.1 would reduce **Impact-C-PS-2** to **less than significant**.

2011 General Plan and FCI GPA EIR Mitigation Measures

In addition to the General Plan policies, mitigation measures Pub-1.1, Pub- 1.2, Pub-1.3, and Pub-1.8 (see Appendix B, General Plan EIR Mitigation Measures) would further reduce the cumulative impact.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.11.6.3 Issue 3: School Services

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, implementation of the prior EIRs mitigation measures Pub-3.1 and Pub-3.2, in combination with the General Plan policies and existing regulations, would reduce **Impact-PS-3 and Impact-C-PS-3** to **less than significant.**

2011 General Plan and FCI GPA EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Pub-3.1 through Pub-3.2 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts related to school services.

In addition, mitigation measures Pub-1.1, Pub- 1.2, and Pub-1.3 would further reduce impacts.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.11.6.4 Issue 4: Library Facilities

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, implementation of the prior EIRs mitigation measures Pub-1.1, Pub- 1.2, and Pub-1.3 in combination with the General Plan policies presented in Section 2.11.3.4 would reduce **Impact-PS-4 and Impact-C-PS-4.** However, even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

2011 General Plan and FCI GPA EIR Mitigation Measures

Mitigation measures Pub-1.1, Pub-1.2, and Pub-1.3 listed in Section 2.11.6.1 would be applied to the proposed project to reduce impacts related to library facilities.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.11.7 Conclusion

2.11.7.1 Issue 1: Fire Protection Services

Implementation of the proposed project has the potential to increase density relative to both existing conditions and the future conditions that would occur under the current General Plan, resulting in additional development and population within the Alpine CPA from what was anticipated in the prior EIRs. The proposed density increase would have the potential to increase the demand for fire protection services in excess of the need identified in the prior EIRs. Therefore, this would be considered a more severe significant impact of the proposed project. For the reasons described above, implementation of the General Plan policies identified in Section 2.11.3.1, and corresponding prior EIRs' mitigation measures identified in Section 2.11.6 of this SEIR, would reduce the project-level impact, but not to a less than significant level. Impacts would be **significant and unavoidable** (**Impact-PS-1**). Additionally, the proposed project's contribution to cumulative impacts associated with fire protection services would be **cumulatively considerable (Impact-C-PS-1)**.

2.11.7.2 Issue 2: Police Protection Services

Implementation of the proposed project has the potential to increase density relative to both existing conditions and the future conditions that would occur under the current General Plan, resulting in additional development and population within the Alpine CPA from what was anticipated in the prior

EIRs. The proposed density increase would have the potential to increase the demand for police protection services. However, for the reasons described above, current staffing levels would meet the SDSD goals under implementation of the proposed project, and impacts would be **less than significant (Impact-PS-2)**. In addition, the proposed project's contribution to cumulative impacts related to police protection services would be similar to those identified in the prior EIRs and **would not be cumulatively considerable (Impact-C-PS-2)**. No new or more severe impacts would occur, and no new mitigation measures are required.

2.11.7.3 Issue 3: School Services

Implementation of the proposed project would potentially increase density relative to both existing conditions and the future conditions that would occur under the current General Plan. The proposed density increase would have the potential to increase the student population within the Alpine CPA in excess of the student population identified in the prior EIRs, potentially requiring the construction or expansion of school facilities that could result in adverse environmental impacts. However, for the reasons described above, physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, would be **less than significant** (**Impact-PS-3**). Additionally, the proposed project's contribution to cumulative impacts **would not be cumulatively considerable (Impact-C-PS-3)**. Implementation of the General Plan policies identified in Section 2.11.3.3, and corresponding prior EIRs mitigation measures identified in Section 2.11.6 of this SEIR, as well as existing regulations, would reduce project-level and cumulative impacts to **less than significant**.

2.11.7.4 Issue 4: Library Facilities

Implementation of the proposed project would increase density relative to both existing conditions and the future conditions that would occur under the current General Plan. The proposed density increase would have the potential to increase the demand for library services in excess of the need identified in the prior EIRs. Therefore, this would be considered a more severe significant impact of the proposed project. For the reasons described above, implementation of the General Plan policies identified in Section 2.11.3.4 and corresponding prior EIRs mitigation measures identified in Section 2.11.6 of this SEIR would reduce the project-level impact. However, impacts would remain **significant and unavoidable**(**Impact-PS-4**)**.** Additionally, the proposed project's contribution to cumulative impacts associated with the construction of library facilities would be **cumulatively considerable (Impact C-PS-4)**.

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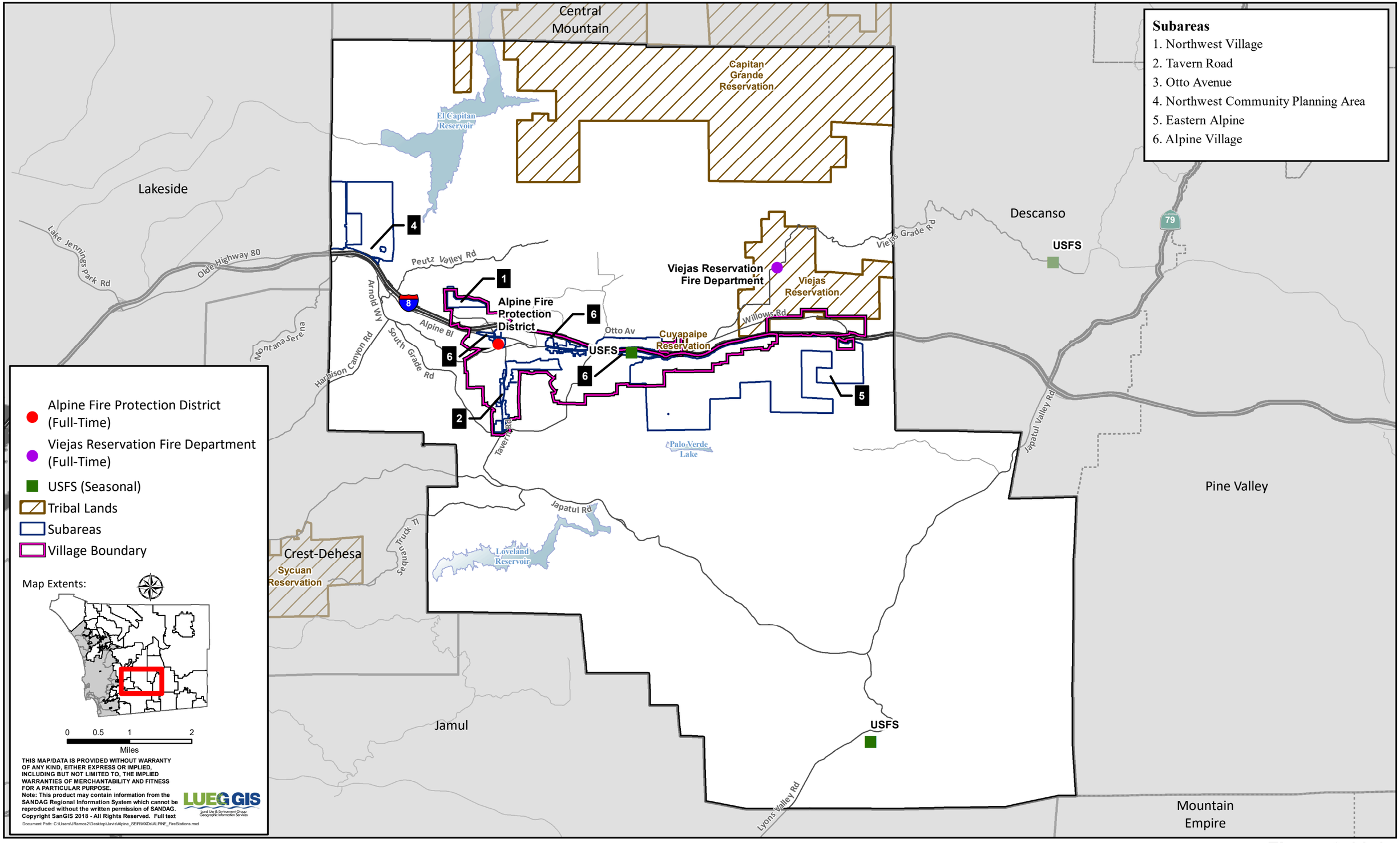
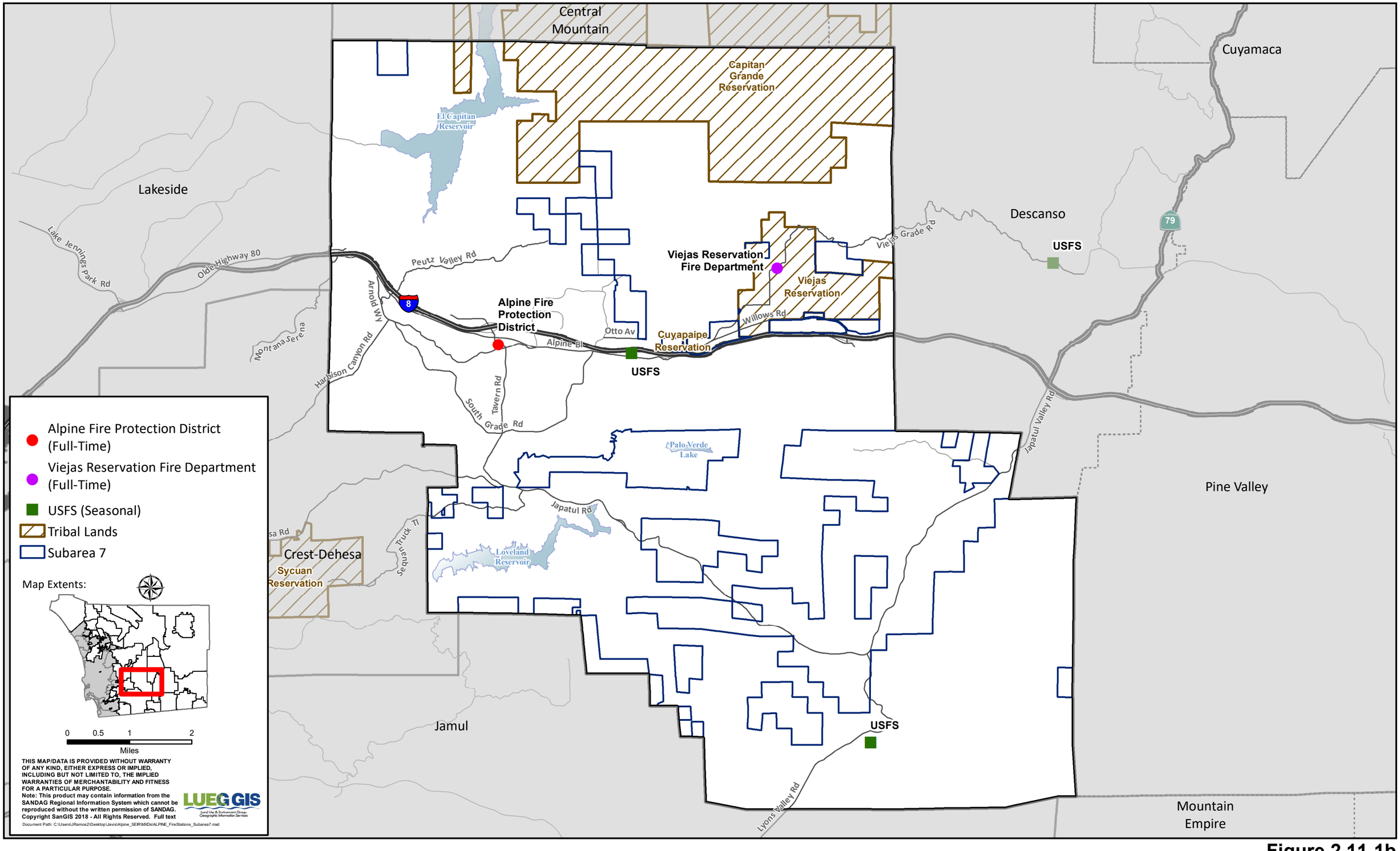


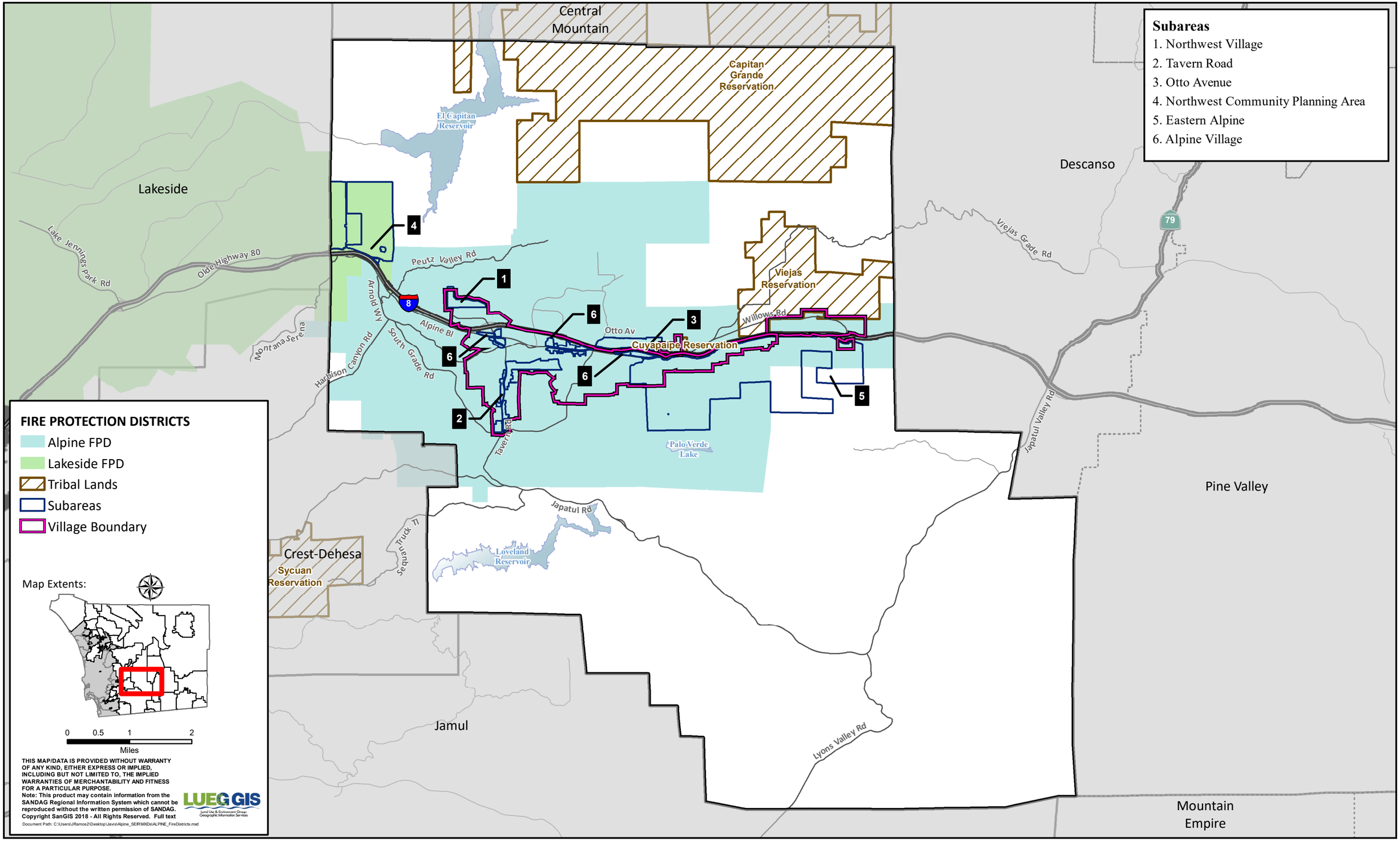
Source: SanGIS, County of San Diego, 2020

Figure 2.11-1a
Fire Protection Stations
Subareas 1-6



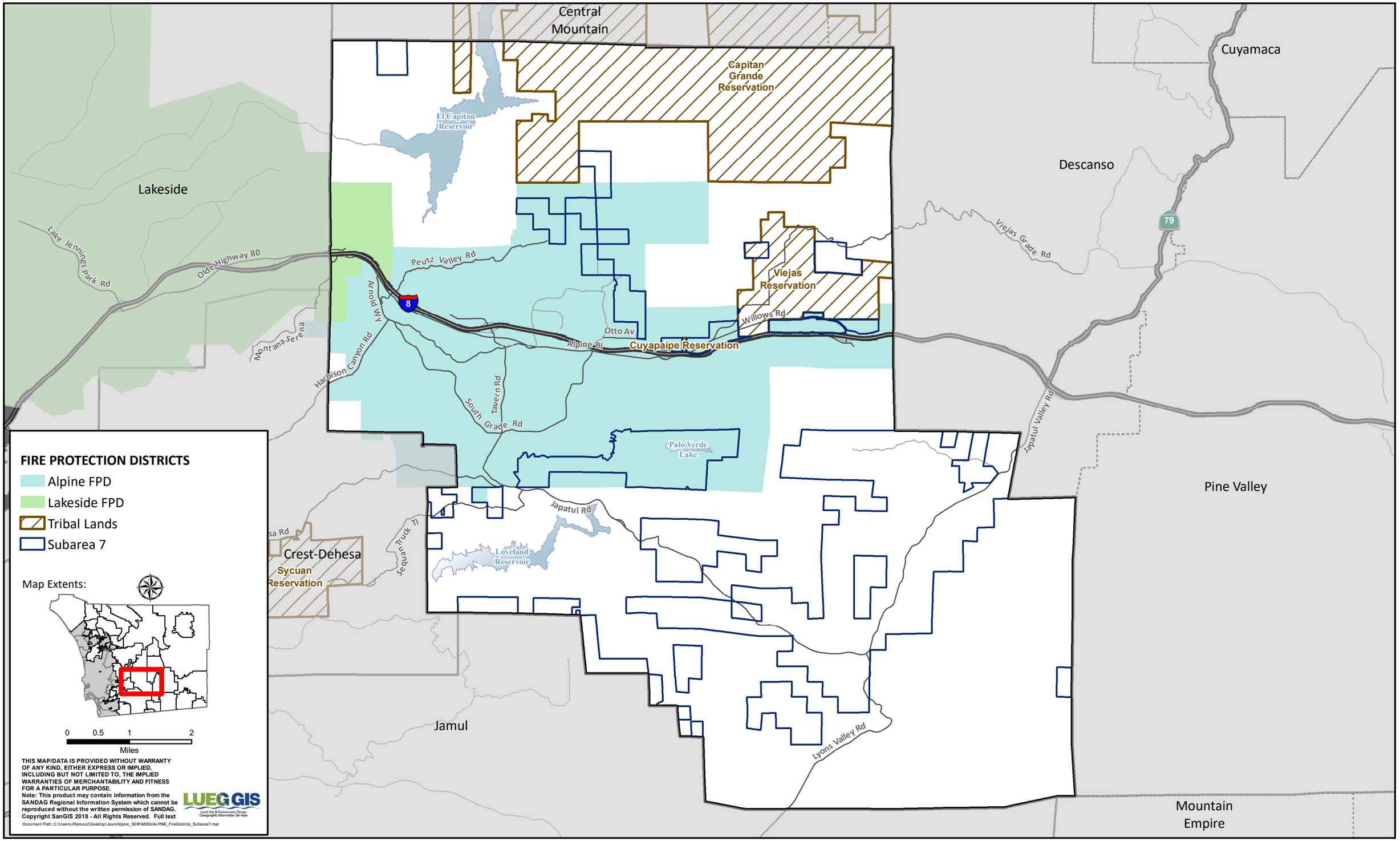
Source: SanGIS, County of San Diego, 2020

Figure 2.11-1b
Fire Protection Stations
Subarea 7



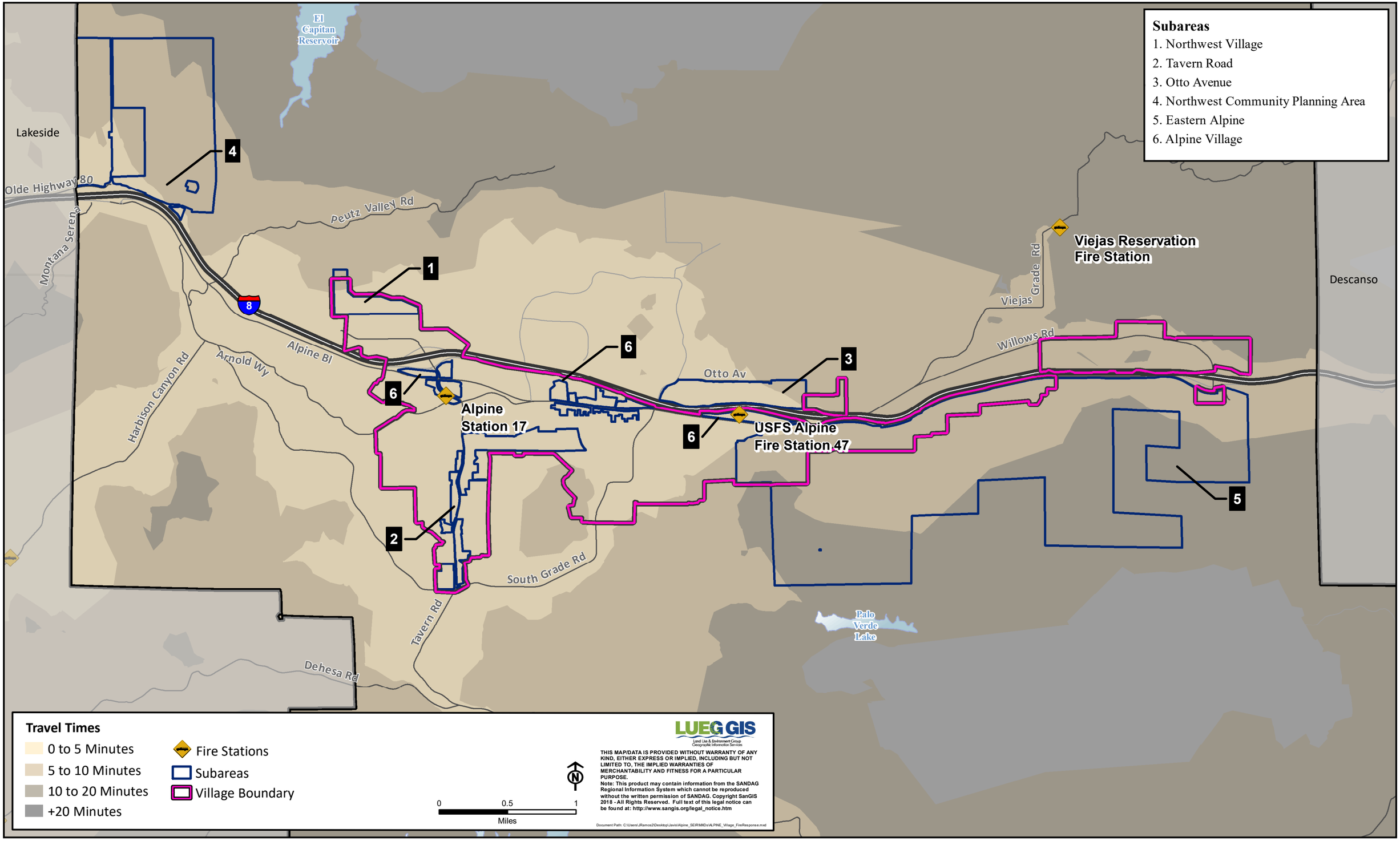
Source: SanGIS, County of San Diego, 2020

Figure 2.11-2a
Fire Protection Districts
Subareas 1-6



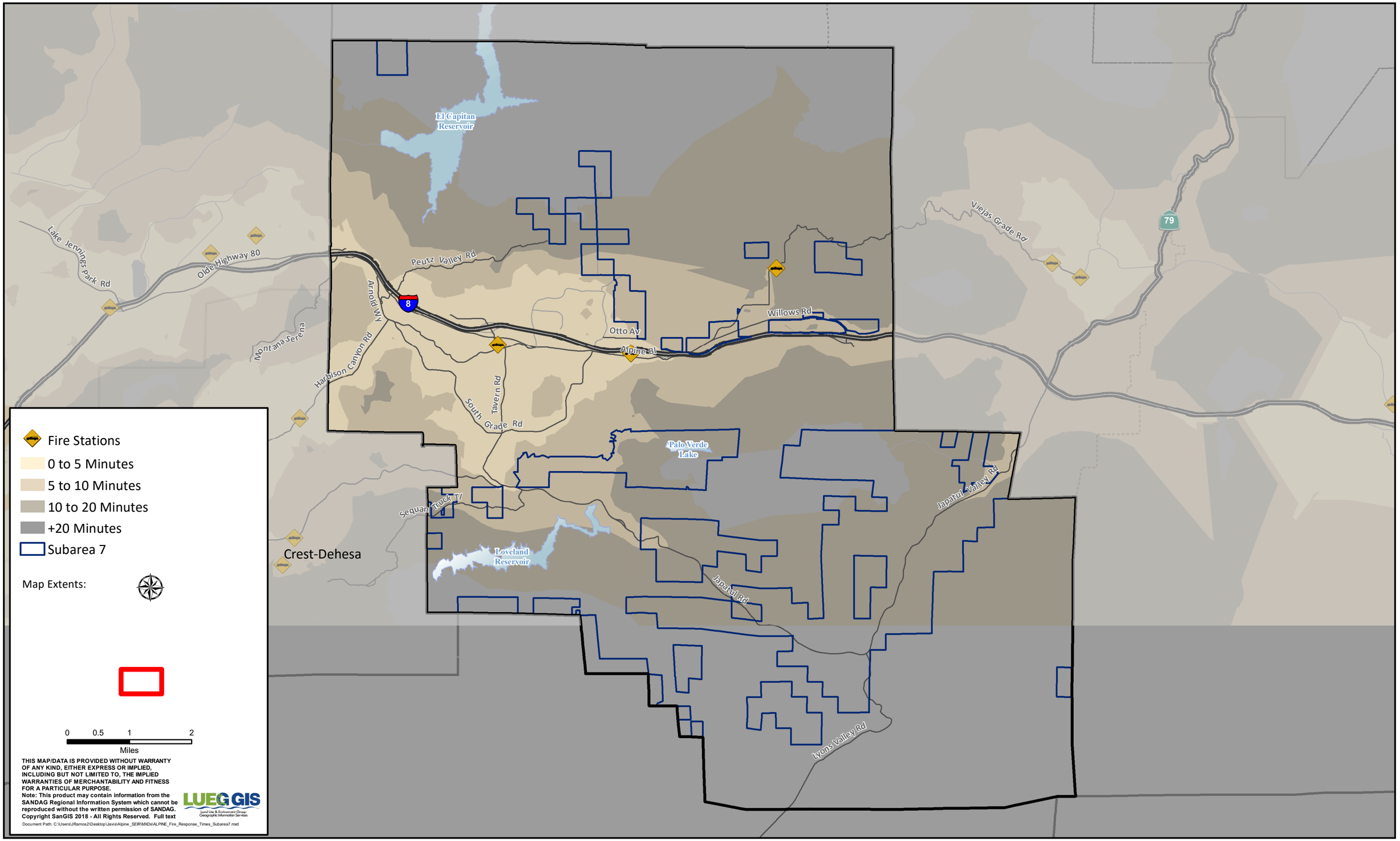
Source: SanGIS, County of San Diego, 2020

Figure 2.11-2b
Fire Protection DIstricts
Subarea 7



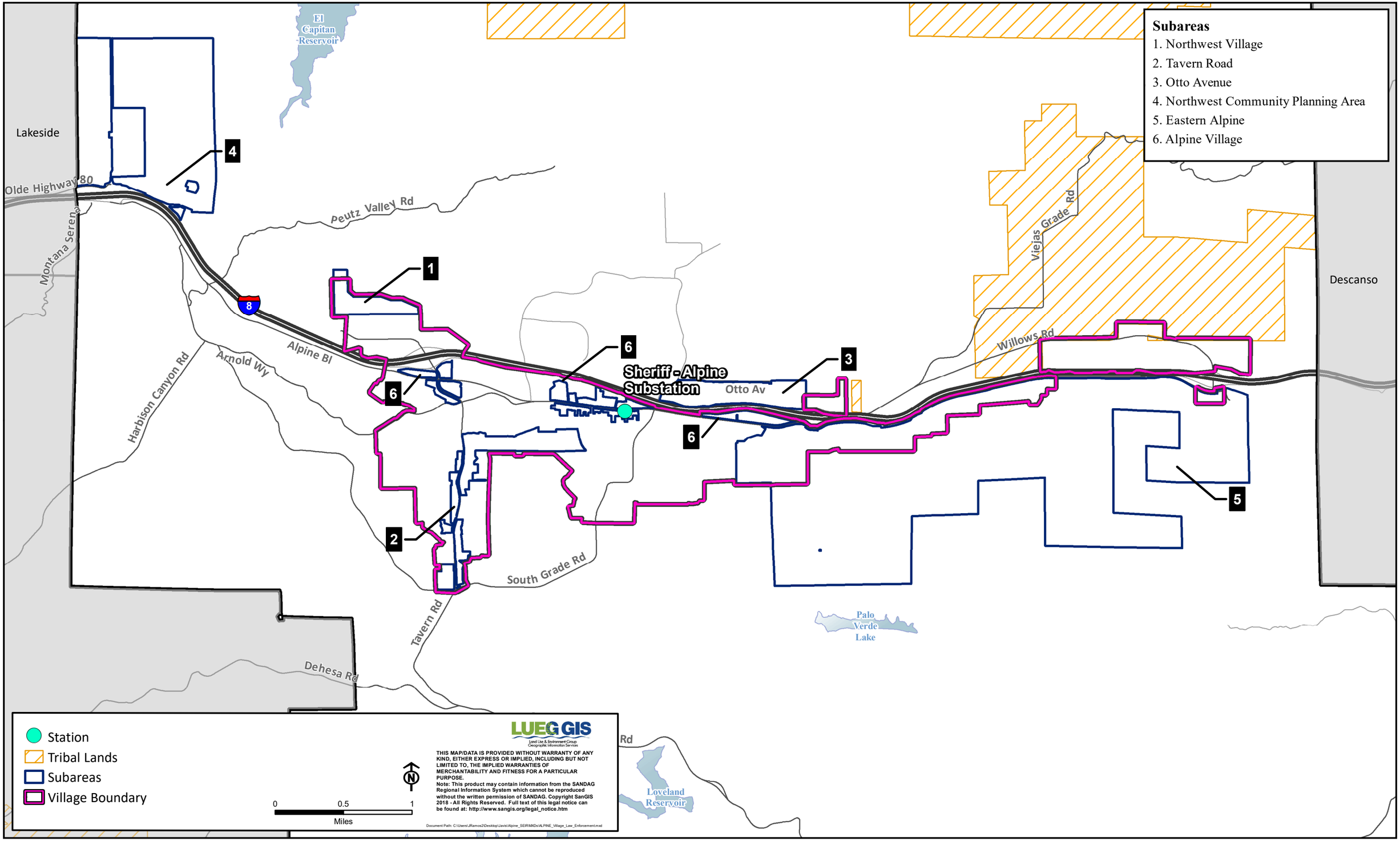
Source: SanGIS, County of San Diego, 2019

Figure 2.11-3a
Existing Fire Travel Times
Subareas 1-6



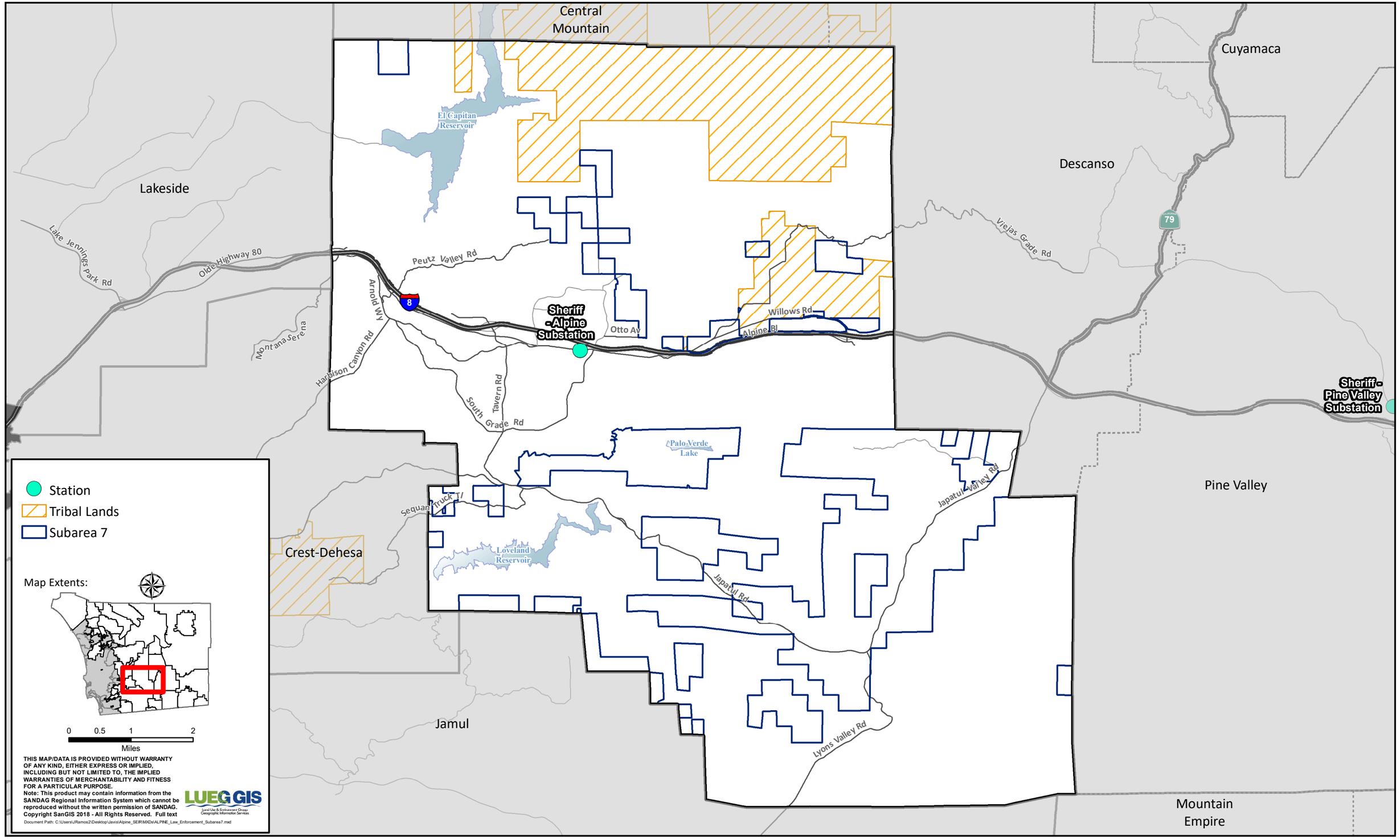
Source: SanGIS, County of San Diego, 2019

Figure 2.11-3b
Existing Fire Travel Times
Subarea 7



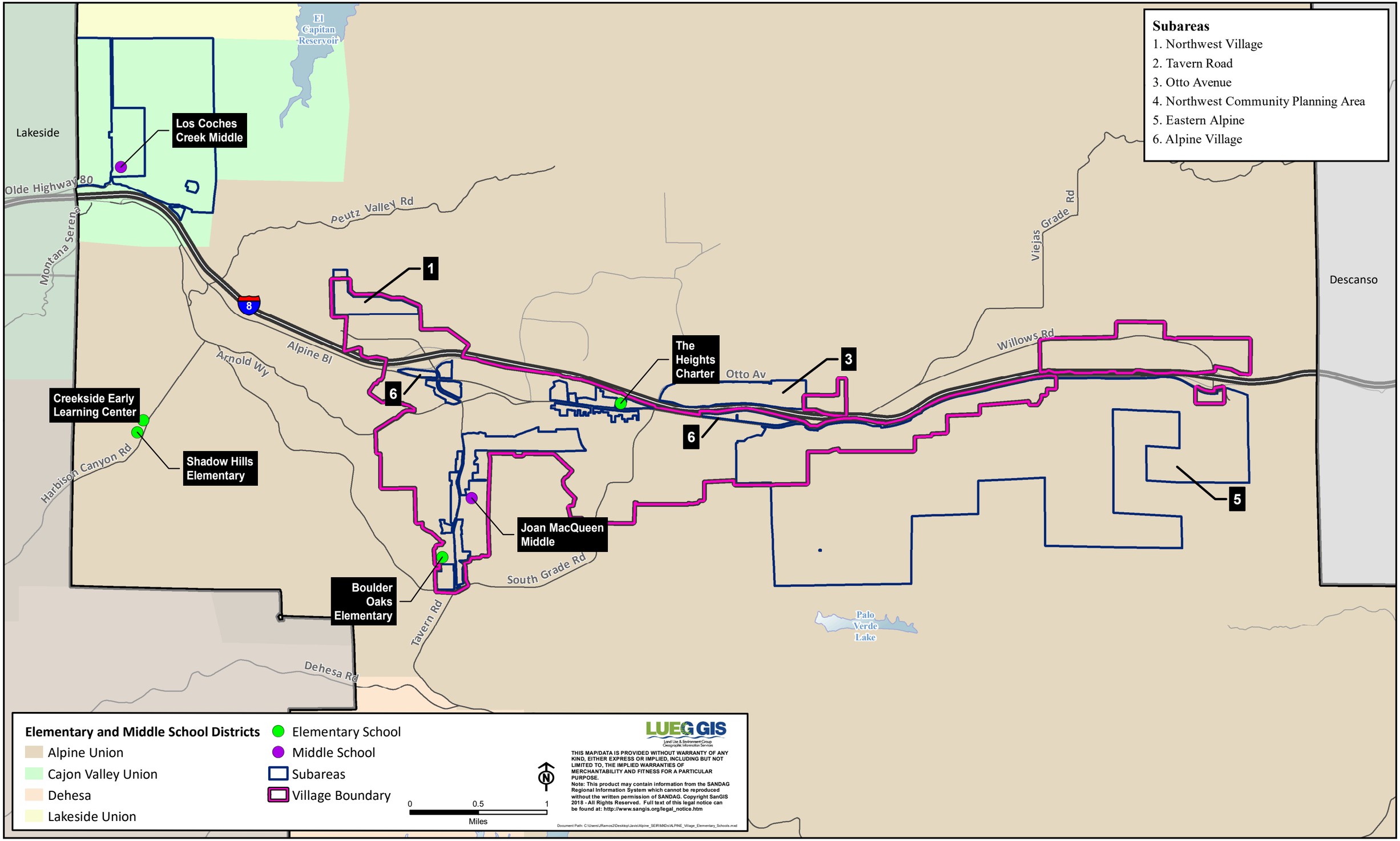
Source: SanGIS, County of San Diego, 2019

Figure 2.11-4a
Law Enforcement Facilities
Subareas 1-6



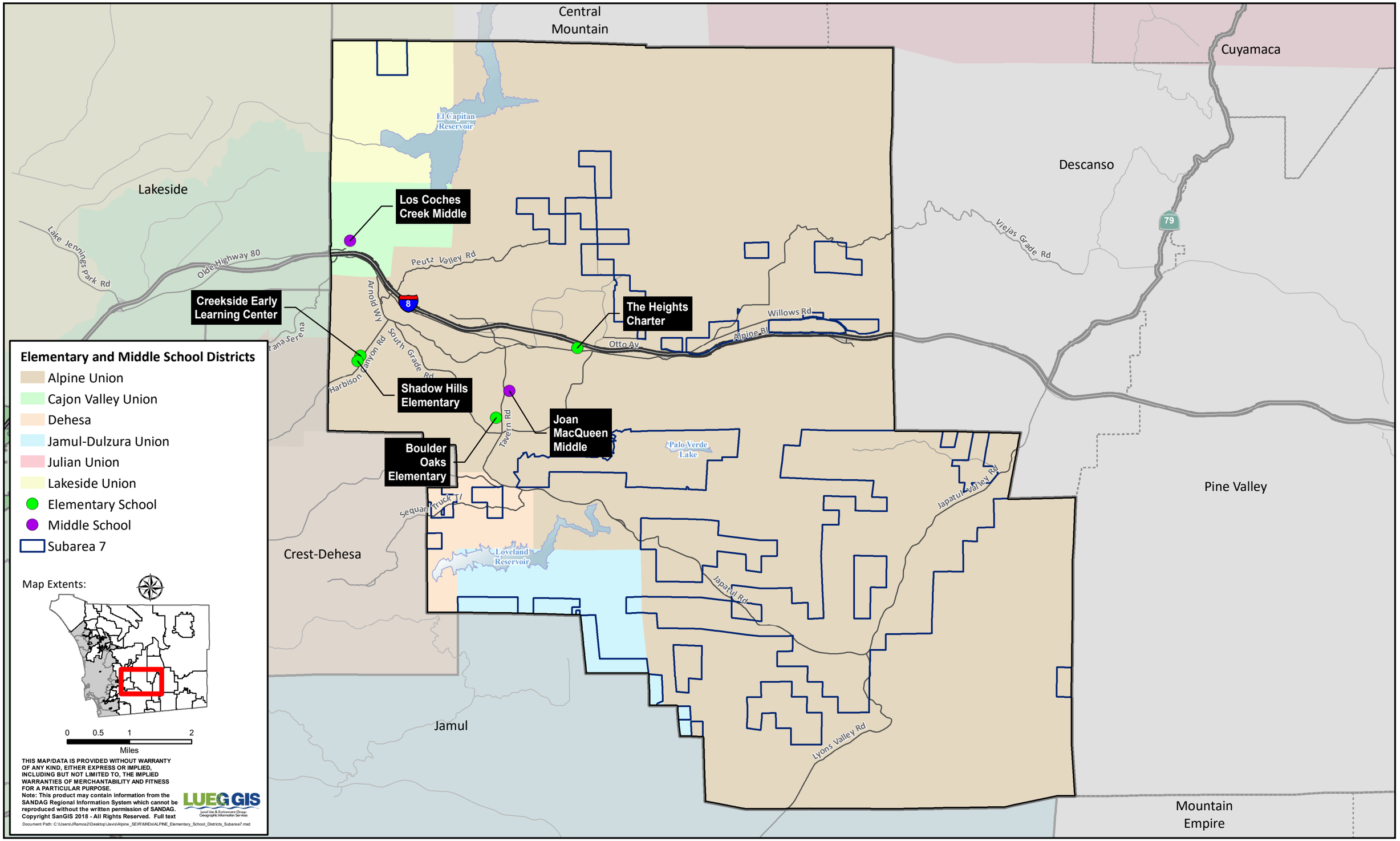
Source: SanGIS, County of San Diego, 2019

Figure 2.11-4b
Law Enforcement Facilities
Subarea 7



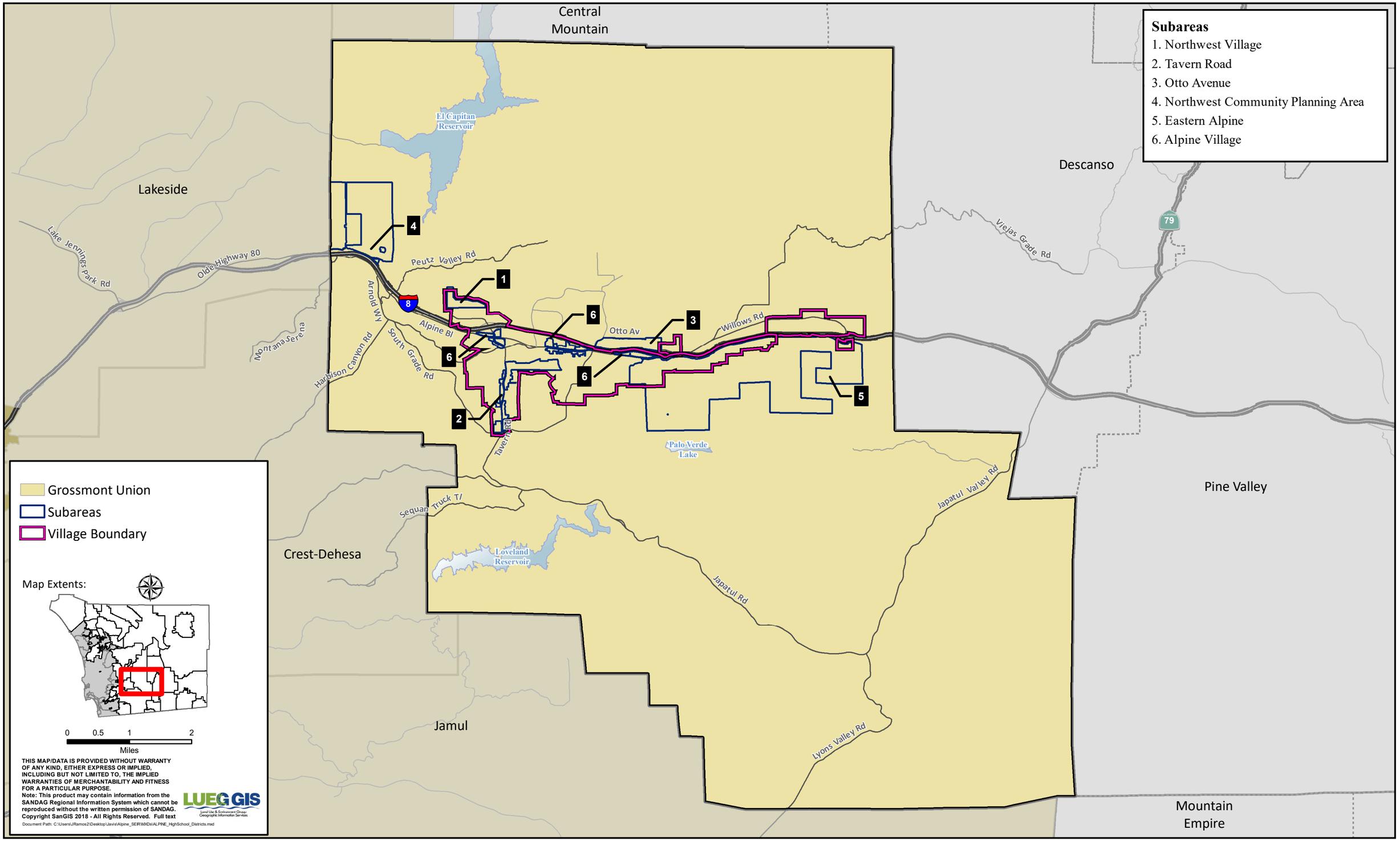
Source: SanGIS, County of San Diego, 2020

Figure 2.11-5a
Elementary School Districts
Subareas 1-6



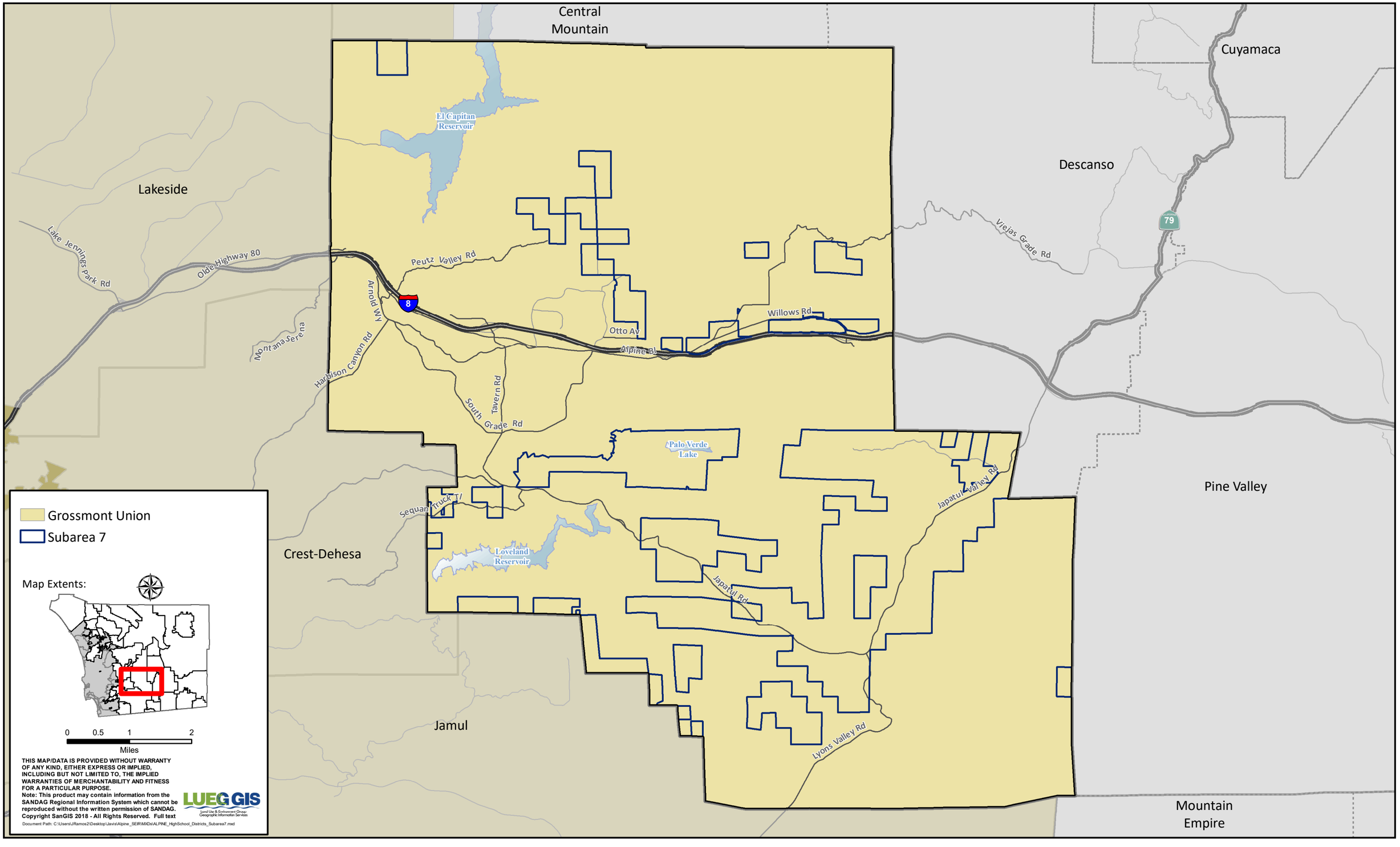
Source: SanGIS, County of San Diego, 2019

Figure 2.11-5b
Elementary School Districts
Subarea 7



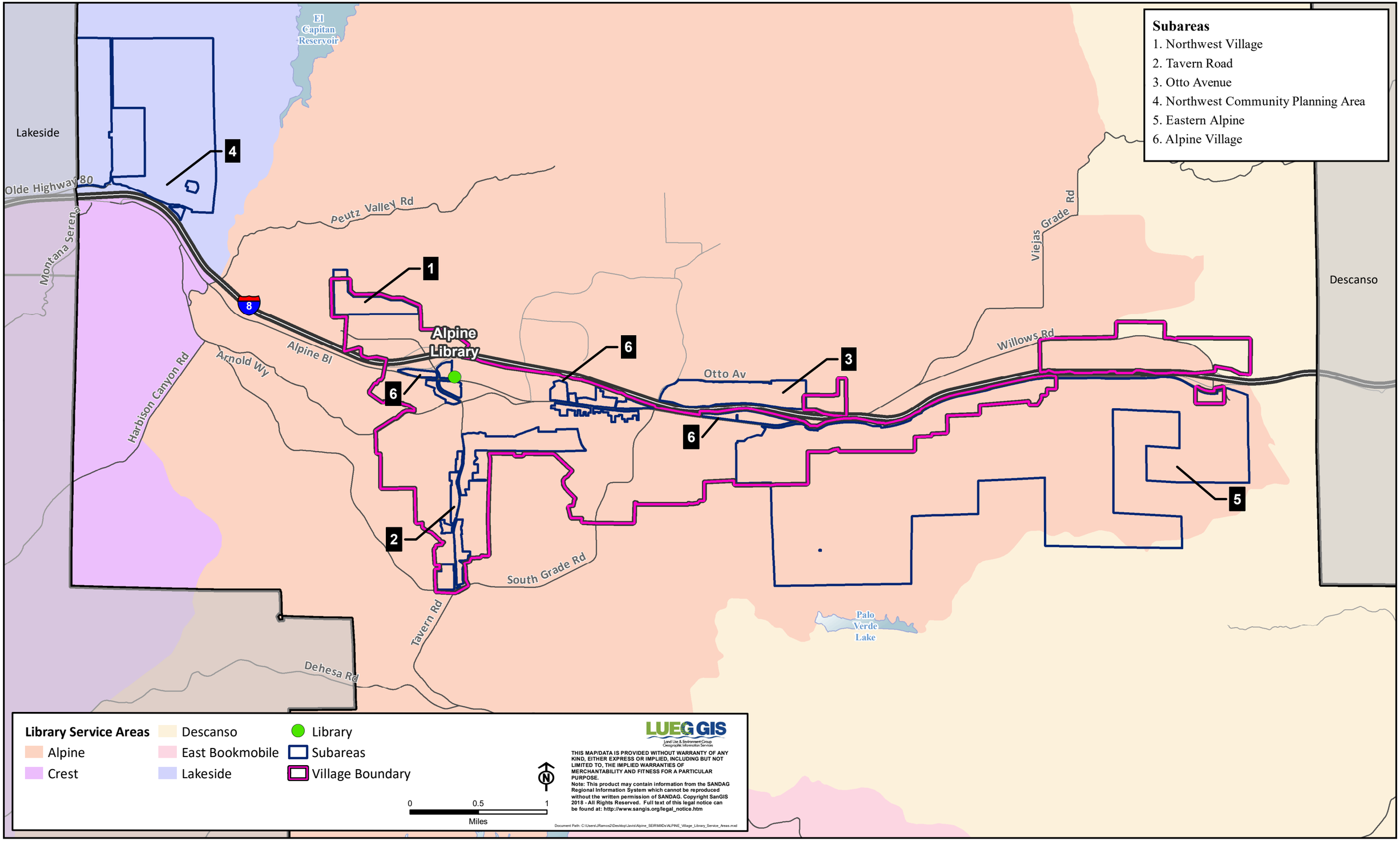
Source: SanGIS, County of San Diego, 2019

Figure 2.11-6a
High School Districts
Subareas 1-6



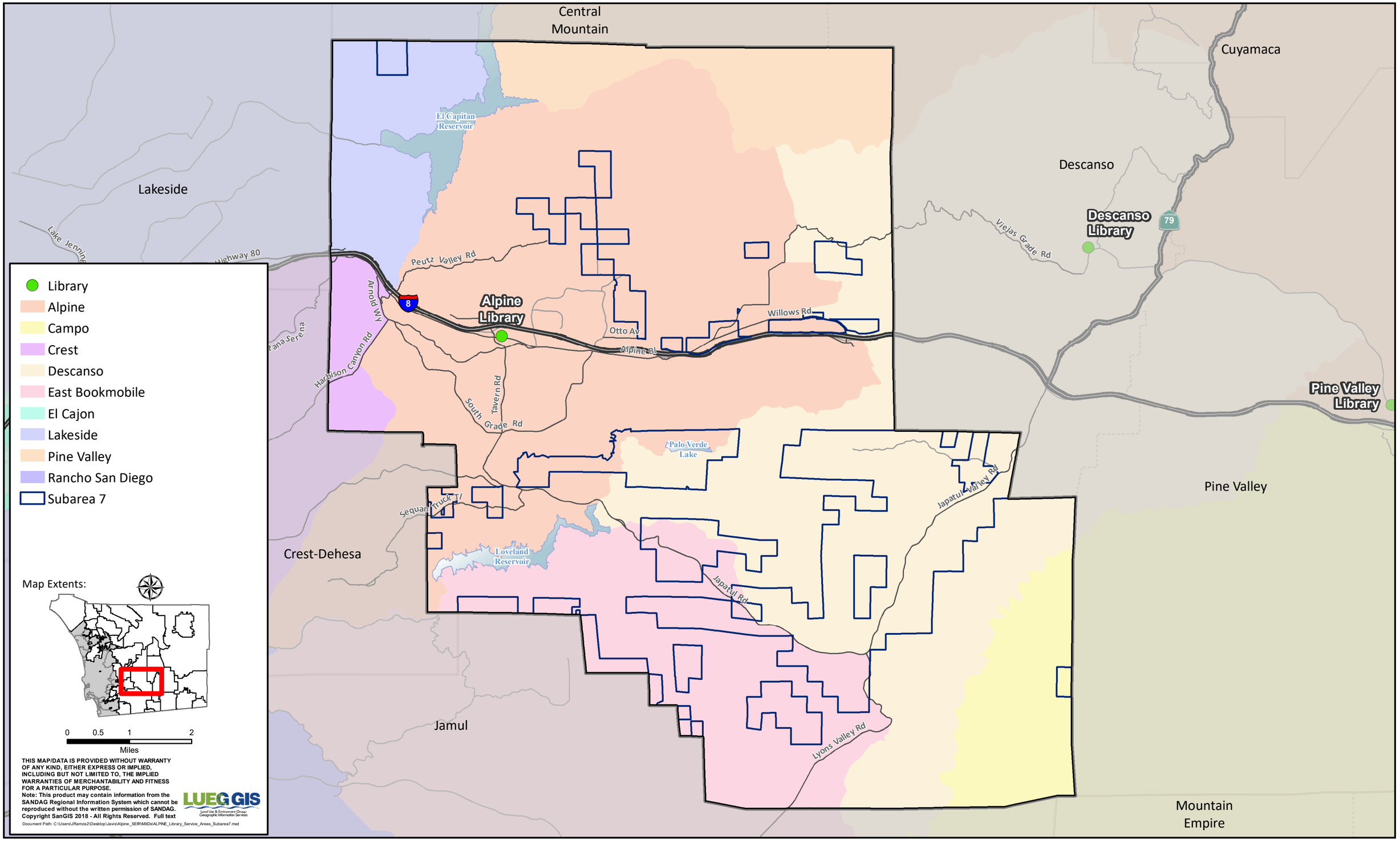
Source: SanGIS, County of San Diego, 2019

Figure 2.11-6b
High School Districts
Subarea 7



Source: SanGIS, County of San Diego, 2020

Figure 2.11-7a
Library Service Areas
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.11-7b
Library Service Areas
Subarea 7

2.12 Recreation

This section of the Supplemental Environmental Impact Report (SEIR) describes the existing recreational resources within the Alpine Community Plan Area (CPA), identifies the existing regulations governing recreational resources, and evaluates the potential impacts to both recreational resources and the environment that could result from implementation of the Alpine Community Plan Update (CPU).

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3 (Project Background) of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. These prior EIRs both have similar significance statements related to recreation. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs because the type and location of recreation have not changed significantly since those documents were prepared. However, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

Table 2.12-1 summarizes the impact conclusions identified in this section.

Table 2.12-1. Recreation Summary of Impacts

Issue Number	Issue Topic	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
REC-1	Parks and Recreational Facilities	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant
REC-2	New Recreational Facilities	Less Than Significant	Potentially Significant	Potentially Significant	Less Than Significant

No comments in the response to the Notice of Preparation (NOP) were received that related to open space areas or recreation. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

2.12.1 Existing Conditions

The Alpine CPA contains several recreational facilities including parks, trails, preserves, reservoirs, and other amenities that provide valuable recreational opportunities to the community while preserving the natural and cultural resources within it. The County of San Diego's Department of Parks and Recreation (DPR) operates several trails within the Alpine CPA. In addition, DPR recently purchased 98 acres of parkland (2480 South Grade Road) of which 24 acres will be developed as active recreation. The balance of acreage will remain as open space/preserve lands. However, there are other recreational facilities managed by non-County entities available for public use within the Alpine CPA. This section describes the recreational facilities within the Alpine CPA and its seven subareas and the administration of these facilities (see Figures 2.12-1a and 1b and 2.12-2a 2b, and Table 2.12-2). Recreational facilities near the Alpine CPA that may be utilized by Alpine residents and visitors are described and analyzed in Section 2.12.4, *Cumulative Impact Analysis*, below.

Table 2.12-2. Parks and Recreational Facilities within the Alpine CPA

Recreational Facility Name	Park Management	Location	Existing Recreational Facility Acreage
County of San Diego			
Community Trails	County of San Diego DPR	Outside Subareas	–
California Riding and Hiking Trail	County of San Diego DPR	Subarea 5	–
Local County Parks			–
South Grade Road**	County of San Diego DPR	Outside Subareas	98
Local (Non-County) Parks			
Boulder Oaks Neighborhood Park*	Alpine Union School District (AUSD)*	Within Subarea 2	2
Joan MacQueen Middle School*	AUSD*	Within Subarea 2	12
Shadow Hills Elementary School*	AUSD*	Outside Subareas	12
Alpine Community Center	Non-profit Corporation	Adjacent to Subarea 6	7
Wright's Field	Back County Land Trust	Adjacent to Subarea 2	202
Local (Non-County) Reservoirs			
Loveland Reservoir	Sweetwater Authority	Outside Subareas	–
El Capitan Reservoir	City of San Diego	Outside Subareas	–
Federal and State			
Cleveland National Forest	United States Forest Service	Within Subarea 5 and Adjacent to Subarea 3	28,020

Source: County of San Diego 2018a, 2020

*Indicates that the park is in a Joint Exercise of Powers Agreement (JEPA), which means that the owner of the facility agrees to allow limited use of the facility by another entity, in this case the County of San Diego and its residents.

**Recently purchased parkland. Twenty-four acres to be developed as active recreation. Balance to remain as open space/preserve lands.

2.12.1.1 County Operated Recreational Facilities

The Alpine CPA has several trails that provide accessibility and connectivity to the scenic and recreational facilities in the area. The system of interconnected regional and community trails and pathways within the Alpine CPA is developed and managed by the County of San Diego according to the County Trails Program and the Community Trails Master Plan (CTMP), but these trails may be developed on public, semi-public, or private lands (County PDS 2005). Within the Alpine CPA, there are several community trails near the Village Boundary, but none are located within the seven subareas. Most of the community trails are south of the Village Boundary near or adjacent to Subareas 2 and 6 (see Figures 2.12-2a and 2b). One regional trail, the California Riding and Hiking Trail, connects the northeastern portion of the Alpine CPA to the southwestern border of the CPA near the Loveland Reservoir through Subarea 5. These trails are listed in Table 2.12-2. Two other proposed regional trails, the Trans County Regional Trail and the San

Diego River Park Regional Trail, would connect the northwestern portion of the CPA near the El Capitan Reservoir to other trails in the Lakeside and Central Mountain region upon their development. Additionally, several community trails are proposed to connect parks and existing trails to the subareas, the Cleveland National Forest (CNF), the Loveland and El Capitan reservoirs, the Sweetwater River Basin, and parks within and surrounding the Alpine CPA (see Figures 2.12-3a and 3b).

The County of San Diego does not own any reservoirs or forests within the Alpine CPA. However, the County has recently purchased 98 acres south of Subarea 2, which will become available to residents and visitors of the Alpine CPA upon its development (see Figure 2.12-3a). Few details are known about the park at this time, but it is anticipated that a portion (24 acres) of the land will be developed with recreational amenities with the remainder as open space/preserved lands.

2.12.1.2 Recreational Facilities Managed by Other Entities (Non-County)

The Alpine CPA includes open space and parkland owned and managed by various agencies, including federal and local government entities and non-profit organizations. This section describes the recreational facilities that are not managed by the County of San Diego's DPR but are managed by other entities. These recreational facilities include forests, parks, preserves, reservoirs, and community centers. Table 2.12-2, above, summarizes the recreational facilities described in this section, and Figures 2.12-1a and 1b and 2.12-2a and 2b identify the locations of these facilities.

Local Recreational Amenities Managed by Other Local Entities (Non-County)

Several parks within the Alpine CPA are not owned by the County of San Diego but may be available to Alpine residents during designated hours. Parks range in acreage depending on the communities they serve and the uses they permit. The parks may be joint use facilities such as schools, community centers, athletic fields, and other recreational facilities. Boulder Oaks Neighborhood Park (2 acres), located adjacent to Subarea 2 and owned by the Alpine Union School District (AUSD), is available to the residents of the County of San Diego during limited hours because of a Joint Exercise of Powers Agreement (JEPA) between the AUSD and the County of San Diego. Boulder Oaks Neighborhood Park includes playground equipment and picnic tables. The AUSD and County of San Diego also have a JEPA for Joan MacQueen Middle School (12 acres) and Shadow Hills Elementary School (12 acres), which have athletic fields that are available for public use outside of the operational hours of the schools. Joan MacQueen Middle School is adjacent to Subarea 2, and Shadow Hills Elementary is outside of the seven subareas. The Alpine Community Center (7 acres), owned by a non-profit corporation, is adjacent to Subarea 6 and is open to the public during limited hours, when visitors may utilize the meeting space, kitchen, playground, park, ballfield, tennis court, and stage on site, but is not under a JEPA with the County of San Diego DPR (Alpine Community Center 2020). Figures 2.12-1a and 1b show the location of the existing local parks in relation to the project area. Table 2.12-2 lists the existing local park acreages within the Alpine CPA.

The Alpine CPA also includes one preserve, Wright's Field. The purpose of preserves is to maintain community character and protect biological, cultural, and historical resources, while making these resources available for limited public recreational opportunities. Some preserves may also provide interpretive and educational amenities, although public access may be limited according to the sensitivity of the resources. Wright's Field totals approximately 203 acres and is adjacent to Subarea 2, south of Subarea 6 and west of Subarea 5 (see Figure 2.12-1a). Wright's Field is owned and managed by the Back Country Land Trust.

Two reservoirs are also located within the Alpine CPA. The Loveland Reservoir is in the southwest portion of the CPA south of Subarea 2, and the El Capitan Reservoir is in the northwest portion of the CPA north of Subarea 4. The Loveland Reservoir is owned and maintained by the Sweetwater Authority and allows limited passive and fishing activities during posted hours. The El Capitan Reservoir is owned and managed by the City of San Diego and permits passive use, barbecue, fishing, and boating activities during limited hours.

Federal and State Lands

The CNF extends throughout the northwest and eastern portions of the Alpine CPA and portions of the forest lie adjacent to Subarea 3 and extend into Subarea 5. The CNF is owned and maintained by the United States Forest Service, and permits recreational activities such as camping, hunting, mountain biking, hiking, all terrain vehicle riding, and target shooting in designated areas.

No other parks, forests, preserves, reservoirs, or other recreational facilities owned or managed by federal or state entities are located within the Alpine CPA.

2.12.1.3 Management of Recreational Facilities within the County of San Diego

The County of San Diego General Plan outlines goals for how to best meet the recreational needs of local communities. To evaluate the recreational need of the County's communities, the County Park Lands Dedication Ordinance (PLDO) divided San Diego County into 24 Local Park Planning Areas (LPPAs) to coincide generally with the Community Plan boundaries outlined in the General Plan. Within each LPPA, the ratio of local or regional parkland per 1,000 residents is calculated to determine whether a community has enough acreage of park land and recreational facilities. This process is further explained below. The advantage of this evaluation is that it may be used to allocate funding for the focused development of recreational facilities in underserved communities. Several sources of funding for such development are outlined in the section below.

Recreational Needs

According the County of San Diego's Parks Master Plan (PMP), the County's minimum Level of Service (LOS) standard for local parks is 3 acres per 1,000 residents, and 10 acres per 1,000 residents for regional parks (County of San Diego 2018b). However, the goal identified in the 2011 General Plan is 10 acres per 1,000 residents for local parks and 15 acres per 1,000 residents for regional parks (County of San Diego 2018b). The PMP minimum standard is an analytical tool for the County's DPR to determine where parks and recreational resources are needed, whereas the 2011 General Plan establishes a goal for long-term park and recreational development. As of 2016, the County has approximately 2 acres of park land per 1,000 residents, and 17 acres of regional parks per 1,000 residents. As of 2019, the Alpine CPA has approximately 1.44 acres of local parkland per 1,000 residents, no regional park land. These totals do not include parks that are not owned by the County or for which there is no JEPA because, although they may meet some of the recreational needs of particular communities, access and use may be restricted.

The PLDO authorizes local jurisdictions to require developers to pay in-lieu fees for local park development or dedicate park land up to 3 acres per 1,000 population. Up to 5 acres may be dedicated per person if the amount of local existing parkland is more than 3 acres per 1,000 residents. Unfortunately, this is still below the General Plan goal of 10 local park acres per 1,000 residents. These funds must be spent within the LPPA in which they were collected, which is generally, but not completely, aligned with CPA boundaries.

Funding

As previously stated, the PLDO is a tool for ensuring the balanced development of parkland alongside residential development. Fees collected via this ordinance may be used for the dedication of parkland, the construction of active recreational facilities, or local-serving active recreational facilities in regional parks. The PLDO is explained in further detail below in Section 2.12.2.2.

Additional funding may be available for park development through the California State Parks Office of Grants and Local Services. State grants may be allocated to specific projects and are offered through state programs with defined goals such as habitat conservation. National Resource Assistance Grants aimed toward promoting conservation and restoring natural and cultural resources are also made available through the USFWS. State and federal grants are the most important funding source for the acquisition and development of parkland (County of San Diego 2011a).

The County also participate in JEPAs and other agreements with public and private entities to develop and maintain recreational facilities on non-County lands. The California Association of Joint Power Authorities (CAJPA) defined JEPAs or JPAs as the joining together of two or more public agencies to provide more effective or efficient government services or to solve a service delivery system (CAJPA 2020). This may consist of cooperatively managing a service or permitting shared use of the service. For example, the County of San Diego participates in a JEPA with the AUSD wherein the community of Alpine and the County of San Diego are allowed limited use of the athletic fields and recreational facilities at Shadow Hills Elementary, Joan MacQueen Middle School, and Boulder Oaks Neighborhood Park, which are owned by the AUSD.

2.12.2 Regulatory Framework

Sections 2.12.2 and 2.14.2 of the prior EIRs included a discussion of the regulatory framework related to recreation in the unincorporated County, including the Alpine CPA, which is hereby incorporated by reference. Regulations described in the prior EIRs that are applicable to the entire County are the same as those described in this SEIR, with the exception of the County's PLDO, DPR's Park Design Manual, Board of Supervisors (BOS) Policy I-136, and BOS Policy G-19. These regulations and their changes are described below, along with the County's PMP, which was adopted after the prior EIRs and therefore not previously included.

The discussion of regulations that were described in the prior EIRs and have not changed will not be repeated here, but the regulations are listed for reference. The updated and new regulations are summarized below.

Applicable federal regulations include:

- National Trails Systems Act of 1968 (Public Law 90-543).

Applicable state regulations include:

- California State Government Code 66477 (The Quimby Act)
- California State Government Code 831.4
- California State Government Code 846
- Government Code Section 65910
- The Landscaping and Lighting Act of 1972
- Government Code Section 50575 et seq. (The Little-Used Open Space Maintenance Act)
- Senate Bill 1685

- Open Space Easement Act of 1974
- Conservation Easement Act of 1979
- Chappie-Z'berg Off-Highway Motor Vehicle Law of 1971
- Off-Highway Motor Vehicle Recreation Act of 2003.

Applicable local regulations include:

- County of San Diego Department of Parks and Recreation Strategic Plan
- County of San Diego Trails Program
- County of San Diego CTMP
- Regional Trails Plan
- County of San Diego Bicycle Transportation Plan
- County of San Diego Multiple Species Conservation Program (MSCP)
- Zoning Ordinance Section 4900 (Usable Open Space Regulation)
- County of San Diego Code of Regulatory Ordinances Sections 86.601–86.608 (Resource Protection Ordinance)
- County of San Diego Code of Regulatory Ordinances Sections 812.101–812.104 (Trail Defense and Indemnification Ordinance)
- County Code of Regulatory Ordinances Sections 812.201–812.214 (Trails Ordinance)
- County of San Diego Ordinance No. 9701, County Ordinance No. 9702, County Ordinance No. 9703
- County of San Diego BOS Policy F-26 (Utilization of Park Fees and Interest Derived from Park Fees)
- County of San Diego BOS Policy G-6 (User Fees County Parks and Recreation Facilities)
- County of San Diego BOS Policy G-15 (Design Standard for County Facilities)
- County of San Diego BOS Policy I-4 (Acquisition of Land with Federal Assistance under the Open Space Program)
- County of San Diego BOS Policy I-44 (Procedure for Designing New County Owned Community/ Local Parks)
- County of San Diego BOS Policy J-37 (Landscaping Maintenance Districts)
- Department of Planning and Land Use Policy CP-15.

Applicable local regulations not included in, updated since, or adopted after adoption of the prior EIRs are described below.

2.12.2.1 County of San Diego Parks Master Plan (PMP)

The County's PMP serves as a guidance document for the acquisition and development of future parks and recreation facilities in the unincorporated County. The purpose of the PMP is to document current conditions and analyze park shortages and distribution inequities in a way that is consistent with County

and DPR approved plans, policies, and ordinances. Because the PMP identifies distribution inequalities and targets areas for future development and acquisition, the PMP is an important budgeting tool for DPR. The PMP also recommends ways that future park projects may be incorporated into the capital improvement budget process and identifies other sources of revenue that can be used to fund future park improvement and development. The PMP is intended to assist in the development of projects and programs that will be supported by the community and lead to improvements within the County's Park and Recreation system.

The PMP found the Alpine CPA to have a deficit of local parkland, but much capacity for park acquisition and development. The PMP found Alpine to have sufficient regional parkland because of the distances to regional parks surrounding the Alpine CPA, but there are no regional parks within the Alpine CPA boundary. Because the population is expected to increase, the PMP recommended the development of additional running, fishing, road biking, mountain biking, camping, and hiking facilities and the intensification of recreational services in the central Alpine area where population is expected to increase most. The PMP also identified 70 vacant parcels totaling 219 acres, which may be suitable for park development were they to be acquired. Overall, the PMP determined that park acquisition is the greatest priority for DPR in the Alpine CPA.

2.12.2.2 County Park Lands Dedication Ordinance

Since certification of the prior EIRs, the County's PLDO has been updated. On July 25, 2018, the BOS adopted a comprehensive update of the PLDO. The PLDO requires dedication of parks, payment of park impact fees, or a combination of both for residential development projects. For residential subdivisions and condominiums with 50 or more dwelling units, the County may require dedication of parkland. Payment of park impact fees are required for all other residential development projects.

The PLDO separates the unincorporated portions of the County into 24 LPPAs. LPPAs are used to determine the amount of park land to be dedicated or the in-lieu fees to be paid for residential development projects that are subject to the PLDO. The PLDO requires that developers dedicate parkland to meet the LOS standard of 3 acres per 1,000 residents for all new residential development. The in-lieu fee is calculated based on the number of dwelling units and includes the cost of acquiring and developing future park and recreation facilities to meet the LOS standard of 3 acres per 1,000 residents. All fees collected in an LPPA must be spent in that park planning area. The LPPA boundaries are similar to, but do not align completely with, CPA boundaries (County DPR 2019).

Existing sources of funding for park acquisition, development, operation, and maintenance include the following: the County's PLDO; local, state and federal funds; donations; and Joint Powers Authorities. PLDO funds are specifically for local park land dedication or active recreation facilities but may be used for local-serving, active recreation in regional parks.

2.12.2.3 County of San Diego Department of Parks and Recreation Park Design Manual

The Park Design Manual (County DPR 2019), developed by the DPR and approved in January 2019, is a reference tool developed for DPR Park Project Managers, consultants, and private developers for improving park land pursuant to the PLDO. The Park Design Manual is to be used for planning, designing, and constructing parks and recreational facilities that will be owned and operated by DPR. The manual supports Live Well San Diego, the County's Strategic Plan and General Plan, and applicable BOS and DPR policies. The Park Design Manual also facilitates DPR's mission of enhancing the quality of life in San Diego

County by providing exceptional parks and recreational experiences and preserving significant natural resources in all aspects of park land development.

The manual is intended to be used for the design of new parks and recreational facilities or retrofitting or rehabilitation of existing parks and recreational facilities that are or will be owned and/or operated and maintained by DPR.

2.12.2.4 Board of Supervisors Policy I-136 (Comprehensive Goals and Policies for Community Facilities Districts)

The purpose of this policy is to support projects that address a public need and provide a public benefit. In compliance with Section 53312.7 of the Government Code, the County has developed goals and policies where special taxes may be levied within the boundaries of a Community Facilities District. Proposed projects requesting Community Facilities District financing of public facilities and/or services will be evaluated to determine if such financing is viable and in the best interest of the County and current and future County residents.

2.12.2.5 Board of Supervisors Policy G-19 (Design Guidelines and Standards for County Parks and Recreational Facilities)

The purpose of this policy is to establish principles and objectives for the design, construction, and improvement of parks and recreational facilities. These goals and objectives emphasize maximizing the life of County-owned park structures while balancing planning, design, construction, maintenance, operation, and replacement costs, and setting standards that maximize energy efficiency and resource conservation, including planning for recycling.

2.12.2.6 County of San Diego General Plan Policies

The General Plan also includes goals and policies in the Land Use Element, Mobility Element, Conservation and Open Space Element, and Housing Element that are applicable to recreational facilities and amenities within the Alpine CPA.

Land Use Element and Housing Element

The Land Use Element includes several goals that encourage a balanced, well-planned environment that includes space for recreational activities and community gathering. Goal LU-6 explicitly states that the built environment should be in balance with the natural environment, and policies LU-6.3 and LU-6.4 require that project and subdivision designs be planned to conserve open space. Policies LU-6.7 and LU-6.8 require projects to connect open space areas to other open space or recreational facilities and outlines the responsibilities of stewards of open space areas. Goal H-2 and policy H-2.2 from the Housing Element are similar and require that residential neighborhoods respect the natural environment by protecting common open space areas. Goal LU-9 focuses on developing the built environment in villages and town centers in a way that contributes to the community's character, and an important part of this is locating parks and recreational facilities in village areas, as is stated in policy LU-9.7. Goal LU-12 ensures that communities have adequate infrastructure, including public facilities such as parks and open space. Policy LU-12.1 requires that new development either provide adequate infrastructure or pay fees, such as those outlined in the PLDO, which will go toward developing them. Goal LU-18 encourages the development of community centers in proximity to other recreational facilities and community centers through policies LU-18.1 and LU-18.2.

Mobility Element

Goal M-12 of the Mobility Element is dedicated to developing a safe, scenic, and interconnected multi-use trail program. This goal is implemented through policies M-12.1 through M-12.10, which encourage the development of new trails in a variety of rural, urban, wilderness areas, and private lands in a manner that is aligned with the County Trails Program, the Regional Trails Plan, and the CTMP while meeting the needs of the public and minimizing environmental impacts.

Conservation and Open Space Element

The Conservation and Open Space Element also has several goals and policies related to parks and recreational facilities. Goals COS-21 and COS-22 recommend the development of parks and recreation facilities that meet the active and passive needs of the community, protect the environment, and foster an awareness of local history. Policies COS-21.1- through COS-21.5 outline how these parks should be designed, where they should be located, and how they should be connected to other parks and trails in the region. Policy COS-22.1 encourages parks to implement a variety of recreational programs that meet the needs of the diverse community of San Diego County. Goal COS-23 recommends fostering recreational opportunities in preserves while monitoring and protecting the natural and cultural references within them. Policies COS-23.1 and COS-23.2 expand on this by emphasizing the need for public access, regional coordination, and open space connectivity. Goal COS-24 relates to the funding of parks and recreational facilities; policies COS-24.1 and COS-24.2 require development to provide fair-share contributions toward parks and recreational facilities and propose that funding be spent on the acquisition of new parks and the maintenance of existing parks.

2.12.2.7 Alpine CPU Policies

Several goals and policies from the Alpine CPU also address recreational facilities and parks as described below:

Land Use Element

Goal LU-6 from the Land Use Element encourages a balance of land uses that conserves natural resources and accommodates the diverse community of Alpine.

Conservation and Open Space Element

Goal COS-3 from the Conservation and Open Space Element calls for the creation of a connected open space system that buffers open space from development. Policy COS-3.1 encourages the preservation of open space corridors between Alpine and the CNF, Loveland and El Capitan Reservoirs, and Sweetwater River Basin. Goal COS-4 proposes the creation of a parks and open space preserve network, and is supported by policies COS-4.1 through COS-4.5, which outline where trails and open space should be located, how their management should be coordinated with neighboring agencies and jurisdictions, and how PLDO funding should be distributed to maximize the recreational benefits for the Alpine CPA.

2.12.3 Analysis of Project Effects and Determination as to Significance

Based on Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

2.12.3.1 Issue 1: Deterioration of Parks and Recreational Facilities

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations would result in potentially significant impacts on recreational facilities. The discussion of impacts on recreational facilities from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.12.3.1 and 2.14.3.1 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs determined that implementation of the 2011 General Plan and FCI GPA would result in potentially significant direct and cumulative impacts related to the deterioration of parks and recreational facilities (County of San Diego 2011a). An in-depth discussion of these impacts can be found in Sections 2.12 and 2.14of the prior EIRs, which is hereby incorporated by reference. These impacts were determined to be less than significant with the implementation of mitigation measures and General Plan policies and the application of federal, state, and local regulations. These policies and mitigation measures would require coordination with other communities, jurisdictional agencies, and organizations to develop park and recreation needs, attain funding for land acquisition and construction of recreational facilities, and prioritize development of trail segments to minimize physical deterioration of recreational facilities.

The proposed project would re-designate the land use designations within four of seven subareas of the Alpine CPA, and in Subareas 2, 4, and 6 would result in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Subarea 5 would have a decrease in dwelling units. Under the proposed project, approximately 6,078 housing units could be developed at buildout within the seven subareas, which represents an increase of approximately 2,013 housing units from what could be developed under the current General Plan. The total number of residents within the Alpine CPA was calculated based on this increase of 2,013 housing units for an increase of 8,341 residents compared to the current General Plan. The analysis below focuses on what the change to the environment would be following the estimated increase of 8,341 residents within the seven subareas under the buildout of the Alpine CPU, resulting in a total of 6,078 units (County of San Diego 2020). Figures 2.12-1a and 1b identify the existing and proposed parks and recreational facilities within the Alpine CPA.

Recreational acreage goals established by the County and in the General Plan may be a useful method for evaluating the potential deterioration of recreational facilities under the implementation of the Alpine CPU. These goals guide the planning and monitoring of recreational facilities; however, recreational facilities are not automatically considered significantly impacted if these acreage goals are not met (County of San Diego 2011a). Currently, approximately 26 acres of local park land serve the Alpine CPA

under a JEPA with the County of San Diego DPR. No regional parks are currently affiliated with the County of San Diego DPR. Parks not managed or accessible by the County of San Diego are not considered in this analysis, as access may be restricted. Although the CPA boundary is not completely aligned with the LPPA boundary for which the General Plan park-to-resident ratios are designed, the CPA boundaries will be used for the purpose of this analysis throughout this chapter, consistent with the County of San Diego PMP (County of San Diego 2018b). The existing population of the Alpine CPA is 18,095 residents (County of San Diego 2020). Therefore, the ratio of existing local park acreage to the existing population of the Alpine CPA is 1.44 acres of park land per 1,000 area residents, which does not meet the County's minimum LOS standard of 3 acres per 1,000 residents. Under the maximum buildout of the Alpine CPU, it is estimated that the population of Alpine will increase by 8,341 residents. It is anticipated that the South Grade Road parkland would be developed during this time, which would make available 98 additional acres of local parkland. This would bring the ratio of local parkland to residents to 4.69, which is well over the minimum LOS standard. If no recreational facilities are constructed or expanded, that would leave Alpine with less than 1 acre of local park land and no regional park land per 1,000 residents.

The proposed project would allow for a greater density of dwelling units in Subareas 2, 4, and 6. Any future projects would be reviewed to identify whether any mitigation measures should be applied to minimize the impacts to recreational facilities. In addition, future projects would be required to provide funds to the PLDO. Any future projects in the Alpine CPA will be subject to federal, state, and local regulations, and must conform to the goals and policies established in the General Plan. Despite these regulations and policies, the proposed project would cause a more severe significant impact related to deterioration of recreational facilities compared to the impact identified within the prior EIRs because of the increased number of dwelling units and residents. As such, the proposed project's impact to deterioration of recreational facilities would be considered **potentially significant**.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.12.2, *Regulatory Framework*, numerous federal, state, and local regulations are related to the development and management of recreational facilities that are also applicable to the Alpine CPU.

The County's PLDO requires dedication of parks, payment of park impact fees, or a combination of both for residential development projects, which encourages balanced development of park space alongside residential development and provides funding for more park space to reduce the demand on existing parks. Additional local ordinances include the County Resource Protection Ordinance, which helps protect sensitive lands and prevent their degradation, and the County BOS policies, which establish guidelines, procedures, fee rates, and objectives for recreational areas within the County, further reducing the impacts associated with increased use of parks and recreational facilities. The County DPR Strategic Plan also establishes objectives for managing environmental resources within the County.

The General Plan includes several policies within the Conservation and Open Space, Housing, Land Use, and Mobility Elements that would reduce the potential for the proposed project to result in deterioration of parks and facilities related to the increased use of parks and recreational facilities. Policies COS-21.1 through COS-21.5, COS-22.1, COS-23.1, COS-23.2, COS-24.1, COS-24.2, H-2.2, LU-6.3, LU-6.4, LU-9.7, LU-12.1, and M-12.1 through M-12.10 require regional coordination; park site planning; funding opportunities; trail planning and diversity; and the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees, that would minimize physical deterioration of recreational facilities. In addition, the prior EIRs identified several mitigation measures addressing impacts on recreational facilities that would be applicable to the

proposed project, including Rec-1.1 through Rec-1.11, which are provided in Section 2.12.6, *Mitigation*, below.

Summary

The proposed project increases the permitted densities within three of the seven subareas, which may result in the deterioration of recreational facilities within the CPA. Future development projects implemented under the Alpine CPU could increase the demand for recreational resources and adversely impact existing recreational facilities beyond what was analyzed in the prior EIRs. Future projects would be evaluated by County staff to determine whether they will adversely affect recreational resources in the area, and all projects implemented under the Alpine CPU will be required to comply with the numerous regulations described in Section 2.12.2 that protect recreational resources. Despite these regulations and policies, impacts to recreational facilities would be **potentially significant**, and mitigation would be required (**Impact-REC-1**).

2.12.3.2 Issue 2: Require the Construction or Expansion of Recreational Facilities

Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on the environment if the construction or expansion of recreational facilities was reasonably foreseeable under the proposed project, and the construction and/or expansion of any such facilities would result in a substantial adverse effect on the environment.

Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations would result in potentially significant impacts to the environment as a result of the expansion or construction of recreational facilities. The discussion of impacts on recreational facilities from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.12.3.1 and 2.14.3.1 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs determined that implementation of the 2011 General Plan and FCI GPA could result in the construction or expansion of recreational facilities, which would result in potentially significant direct and cumulative impacts related to the environment (County of San Diego 2011a). An in-depth discussion of these impacts can be found in Sections 2.12 and 2.14of the prior EIRs, which is hereby incorporated by reference. These impacts were determined to be less than significant with the implementation of mitigation measures and General Plan policies and the application of federal, state, and local regulations. These policies and mitigation measures would require the use of community design guidelines when designing park and recreation facilities; amend the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods by providing connected and continuous roads; provide environmentally sensitive pathway/trail and recreation/open space networks; and develop procedures that encourage the involvement of the community to consider designating trails that correspond to existing and already disturbed areas to reduce the adverse effect on the environment.

As previously described, the Alpine CPA is currently below the County's minimum LOS standard ratio of parkland to residents. Future development projects implemented under the Alpine CPU would further increase the number of residents in the Alpine CPA, creating an even greater demand for recreational resources. It is possible that the increase in demand for recreational resources could lead to the

construction or expansion of recreational facilities within the Alpine CPA. The analysis below focuses on what the change to the environment would be following the estimated increase of 8,341 residents within the seven subareas under the buildout of the Alpine CPU. The total number of residents within the Alpine CPA was calculated based on this increase of 2,013 housing units for an increase of 8,341 residents compared to the 2011 General Plan and FCI GPA. Figures 2.12-1a and 1b identify the existing and proposed parks and recreational facilities within the Alpine CPA.

Currently, approximately 26 acres of local park land serving the Alpine CPA, which are under a JEPA with the County of San Diego DPR. Parks not under a JEPA with the County DPR are not considered for this analysis because they may have restricted access. No regional parks within the Alpine CPA are affiliated with the County of San Diego DPR. The ratio of existing local parks to the population of the Alpine CPA is 1.44 acres of park land per 1,000 area residents, which does not meet the County's minimum LOS standard of 3 acres of local parkland per 1,000 residents. The ratio of existing regional parks to the population of the Alpine CPA is 0.0 acres of park land per 1,000 residents, which also does not meet the County's minimum LOS standard of 10 acres of regional parkland per 1,000 residents.

Under the maximum buildout of the Alpine CPU, it is estimated that the population of Alpine will increase by 8,341 residents, which would reduce the local park acre-to-resident ratio to less than one. This means there would be a deficit of approximately 54 acres of local park land and 265 acres of regional parkland per 1,000 residents if no additional parks were added during the buildout. However, the anticipated development of the South Grade Road park, which will be managed by the County DPR, will add 98 acres of parkland to the Alpine CPA. The future anticipated ratio of proposed parkland to proposed population under the Alpine CPU would therefore be 4.69 acres of local parkland per 1,000 residents, which would meet the LOS standard of 3 acres of local parkland per 1,000 residents. However, a deficit of parkland does not automatically create a significant impact on the environment, as these ratios are only analytical tools and there is no guarantee that any recreational facilities will be built as a result of this anticipated deficit in park land; however, it does indicate that the future construction or expansion of recreational facilities may be likely.

Construction of new, or expansion of existing, parks and recreational facilities under the implementation of the Alpine CPU could adversely impact the environment, including valuable natural and cultural resources. The construction or expansion of parks and recreational facilities could also increase traffic on affected roadways, result in higher temporary and permanent ambient noise levels, and obstruct scenic views or impact visual resources, including light and glare. Any future projects would be reviewed to identify whether any mitigation measures should be applied to minimize the impacts to environmental resources. In addition, any future projects in the Alpine CPA will be subject to federal, state, and local regulations, and must conform to the goals and policies established in the General Plan. Despite these regulations and policies, this impact is **potentially significant** because the increase in development could adversely impact environmental resources as a result of the expansion or construction of recreational facilities within the Alpine CPA.

Federal, State, and Local Regulations and Existing Regulatory Processes

As identified in Section 2.12.2, there are numerous federal, state, and local regulations regarding the development and management of recreational facilities that are also applicable to the Alpine CPU.

Various planning documents, including but not limited to the CTMP, the Regional Trails Plan, the County Bicycle Transportation Plan, the County of San Diego Parks Master Plan, and the County of San Diego DPR Design Manual, support the environmentally responsible development of recreational facilities within the San Diego County, including the Alpine CPA. The CTMP and the Regional Trails Plan outline a trail system

that may serve as an alternative off-road mode of transportation for individuals seeking to decrease their carbon footprint on the local environment. Similarly, the Bicycle Transportation Plan guides the development of bicycle trails in each community, which may also ameliorate the environmental impact of an increase in density. Additionally, the County of San Diego Parks Master Plan and DPR Park Design Manual encourage park developers to take into consideration the natural environment and make every effort to protect cultural and natural resources.

Future development projects, including the construction or expansion of recreational facilities that are implemented under the Alpine CPU, will also be expected to comply with local regulations protecting environmental resources, such as the Zoning Ordinance, the Noise Ordinance, the MSCP, the Habitat Loss Permit (HLP) Ordinance, and other relevant policies.

The General Plan also includes several policies within the Conservation and Open Space, Housing, Land Use, and Mobility Elements that would reduce the potential for the proposed project to result in deterioration of parks and facilities related to the increased use of parks and recreational facilities. Policies COS-23.1, LU-6.7, LU-6.8, LU-18.1, LU-18.2, and M-12.9 encourage the development of open space near existing open space, outline guidelines for the stewardship of open space preserves, and require that open space projects be developed in a way that minimizes impacts to the environment and enhances and preserves natural and cultural resources. In addition, the prior EIRs identified several mitigation measures addressing impacts related to the construction of new recreational facilities or the expansion of existing facilities, including Rec-2.1 through Rec-2.6, which are provided in Section 2.12.6, Mitigation, below.

Summary

The proposed project increases the permitted density of dwelling units within the Alpine CPA beyond what was allowed by the current General Plan and analyzed by the prior EIRs. Because of the deficit of recreational facilities in the Alpine CPA, it is possible that recreational facilities will be constructed or expanded as the Alpine CPA is built out. Future development involving the construction or expansion of recreational facilities would be evaluated by County staff for all potentially significant impacts resulting from the improvement and development of parks and recreational facilities. Such facilities must also comply with applicable regulations protecting environmental resources including those described in Section 2.12.2. Despite these regulations and policies, impacts to the environmental resulting from the construction or expansion of recreational facilities would be **potentially significant**, and mitigation would be required (Impact-REC-2).

2.12.4 Cumulative Impact Analysis

Some recreational facilities, because of their size, facilities, or characteristics, are utilized by individuals who do not live in the local neighborhood or community. Therefore, there is a potential that development in neighboring communities such as Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, Jamul/Dulzura, and the Viejas reservation, combined with any development within the Alpine CPU, could increase the use of parks and recreational facilities within the Alpine CPA. Additionally, future development within the Alpine CPA could increase foot traffic at parks, preserves, and refuges nearby, including but not limited to Old Ironsides County Park, Nancy Jane County Park, South Lane County Park, Flinn Springs County Park, El Monte County Park, Oakoasis Preserve, El Capitan Preserve, Cuyamaca Rancho State Park, and the San Diego National Wildlife Refuge. The increased use would potentially accelerate the physical deterioration of park or recreational facilities, and/or require the need for new or expanded recreational facilities to accommodate increased growth. Therefore, the geographic scope of the

cumulative impact analysis for recreational resources includes the adjacent communities of Lakeside, Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, Jamul/Dulzura, and the Viejas Reservation.

2.12.4.1 Issue 1: Deterioration of Parks and Recreational Facilities

A cumulative impact on parks and recreational facilities would occur if future development associated with the cumulative projected growth within the Alpine CPA would increase the use of parks and recreational facilities in a manner that would result in their physical deterioration. Future development within the Alpine CPA would have the potential to increase development and dwelling unit density, which could increase the number of residents and visitors using recreational facilities in the Alpine CPA and neighboring communities. This increased use would accelerate the physical deterioration of the parks or recreational facilities that these residents would use, both within the Alpine CPA and in neighboring communities.

Similarly, development projects in surrounding communities could result in increased visitors to recreational facilities within the Alpine CPA. This increased use could lead to the deterioration of recreational facilities within the Alpine CPA, which would be considered a significant impact. Adjacent communities under the County's jurisdiction would still be required to comply with the federal, state, and local regulations listed in Section 2.12.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, recreational facilities could still be impacted by future development activities in adjacent communities, and this development could potentially cause a significant cumulative impact related to historical resources.

As described in Section 2.12.3.1, the proposed project allows for increased density of dwelling units than was permitted under the General Plan. The proposed density increase would increase the use of existing recreational facilities, potentially leading to the physical deterioration of these facilities. Although the cumulative projected growth and development must comply with existing regulations and policies, recreational facilities could potentially be adversely impacted. Therefore, cumulative impacts from future growth and development within the cumulative study area would result in a **cumulatively considerable impact** and mitigation would be required. (Impact-C-REC-1).

2.12.4.2 Issue 2: Require Construction or Expansion of Recreational Facilities

A cumulative impact on parks and recreational facilities would occur if future development associated with the cumulative projected growth within the Alpine CPA would result in the construction or expansion of recreational facilities that would adversely impact the environment. The development of higher-density residential projects could result in the construction or expansion of parks, as all new development is required to comply with General Plan policies and regulations that promote the balanced distribution of the built and natural environment. Alternatively, developers may be required to fund the construction or expansion of recreational facilities according to the PLDO in the future. The construction or expansion of recreational facilities associated with this development could adversely impact the environment within the Alpine CPA and could also affect wildlife corridors and habitats connected to neighboring communities. This construction and its associated environmental impacts constitute a potentially significant impact to both the Alpine CPA and neighboring communities.

Similarly, development projects in surrounding communities could result in the construction or expansion of recreational facilities that could adversely impact the natural environment within the Alpine CPA, which would be considered a significant impact. Adjacent communities under the County's

jurisdiction would still be required to comply with the federal, state, and local regulations listed in Section 2.12.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, the environment could still be impacted by future construction or expansion of recreational facilities in adjacent communities, which would constitute a potentially significant impact to the environment.

As described in Section 2.12.3.2, the proposed project allows for increased density of dwelling units than was permitted under the General Plan. Because development projects within San Diego County, including the Alpine CPA, are required to comply with federal, state, and local regulations and are expected to follow the goals and policies established in the General Plan, recreational facilities may be constructed or expanded as a result of new residential development. The increase in density associated with implementation of the Alpine CPU could result in an increase in population of approximately 8,341 residents, which would require an additional 77 acres of local recreational facilities in the Alpine CPA to comply with the County's minimum LOS standard of 3 acres of local park land per 1,000 residents. This potential construction or expansion could adversely impact the environment. Although the cumulative projected growth and development must comply with existing regulations and policies, recreational facilities could potentially be adversely impacted. Therefore, cumulative impacts from future growth and development within the cumulative study area would result in a **cumulatively considerable impact** and mitigation would be required. (Impact-C-REC-2).

2.12.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the Alpine CPA would result in potentially significant direct and cumulative impacts to parks and recreational facilities.

Impact-REC-1: Result in Deterioration of Parks and Recreational Facilities. Future development occurring as part of implementation of the Alpine CPU would result in an increased demand for parks and recreational facilities such that substantial deterioration of these recreational resources would occur.

Impact-REC-2: Construction or Alteration of Recreational Facilities. The increased population that would occur with implementation of the Alpine CPU would result in the need for new or expanded parks and recreational facilities, the construction of which would result in significant environmental effects.

Impact-C-REC-1: Result in Deterioration of Parks and Recreational Facilities. The proposed project would cause a similar impact related to the deterioration of parks and recreational facilities compared to the impacts identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

Impact-C-REC-2: Construction or Alteration of Recreational Facilities. The proposed project would cause a similar impact related to the construction or alteration of recreational facilities compared to the impacts identified in the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.12.6 Mitigation

2.12.6.1 Issue 1: Deterioration of Parks and Recreational Facilities

The following prior EIRs mitigation measures would reduce Impact-REC-1 and Impact-C-REC-1, the direct and cumulative deterioration of parks and recreational facilities, to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Rec-1.1 through Rec-1.11 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's potential to deteriorate parks and recreational facilities.

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

2.12.6.2 Issue 2: Require Construction or Alteration of Recreational Facilities

The following prior EIRs mitigation measures would reduce Impact-REC-2 and Impact-C-REC-2, direct and cumulative impacts to the environment caused by the construction or alteration of recreational facilities, to **less than significant**.

2011 General Plan and FCI Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Rec-1.1 through 1.4, Rec-1.8 and 1.9, Rec-1.11, and Rec-2.1 through 2.6 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce impacts related to the construction or alteration of recreational facilities.

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

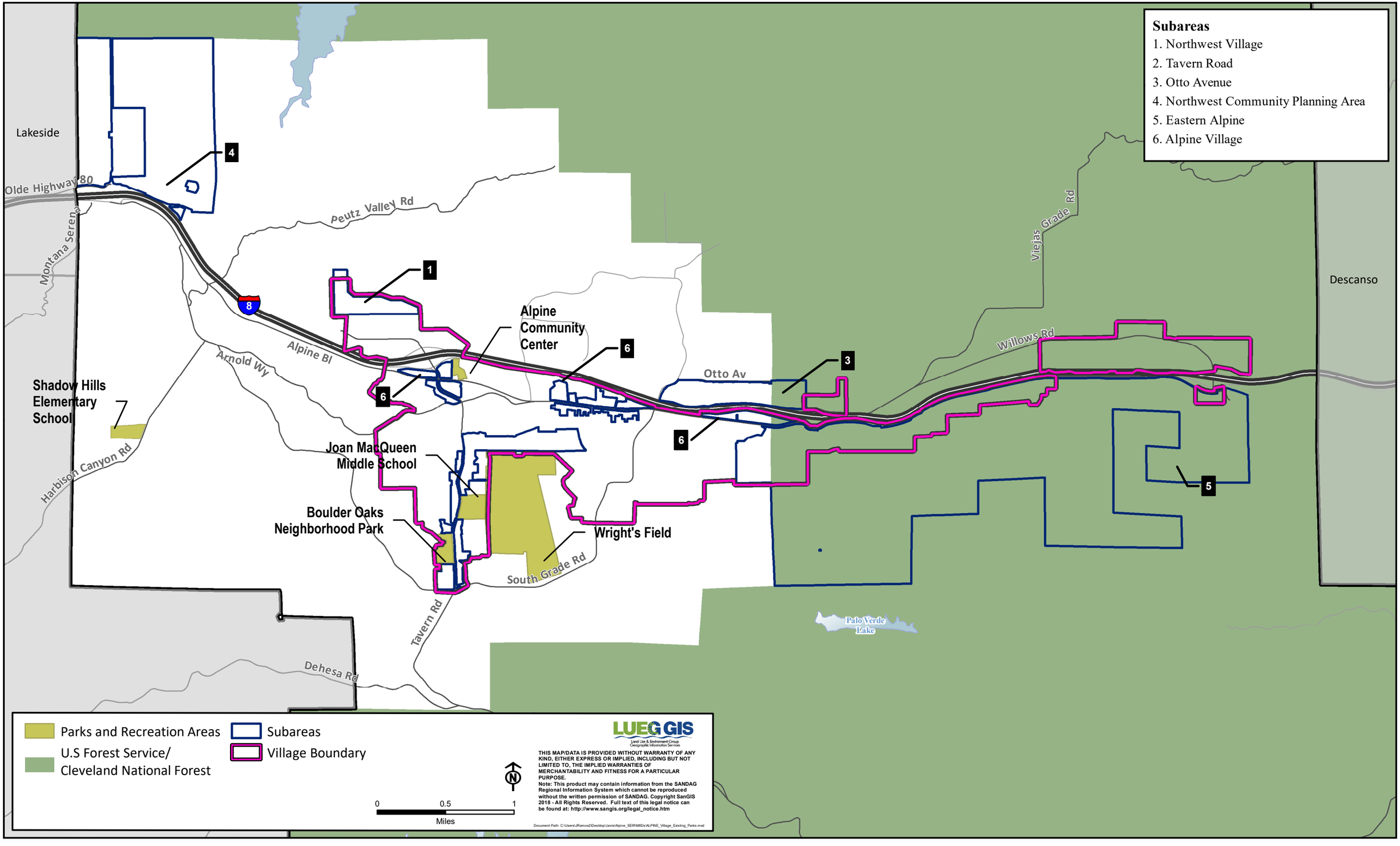
2.12.7 Conclusion

2.12.7.1 Issue 1: Deterioration of Parks and Recreational Facilities

Implementation of the Alpine CPU would increase future development in the Alpine CPA. This could result in the increased use of existing local parks, potentially resulting in accelerated deterioration of parks and recreational facilities. The overall impacts related to the deterioration of parks and recreational facilities would be more severe than those described in the prior EIRs. Therefore, the proposed project would result in a potentially significant impact related to the deterioration of parks and recreational facilities (Impact-REC-1). The proposed project in conjunction with subsequent projects would also result in a potentially significant cumulative impact (Impact-C-REC-1). However, for the reasons described above, the application of existing regulations in combination with the adopted General Plan policies identified in Section 2.12.3.1 and prior EIRs mitigation measures, such as MM Rec-1.1, which requires that Community Plans be utilized to determine park and recreation facility requirements, and other measures that encourage land acquisition, trail expansion, and the construction of recreational facilities in tandem with community growth, would mitigate direct and cumulative impacts to recreational facilities to **less than significant** and impacts **would not be cumulatively considerable**.

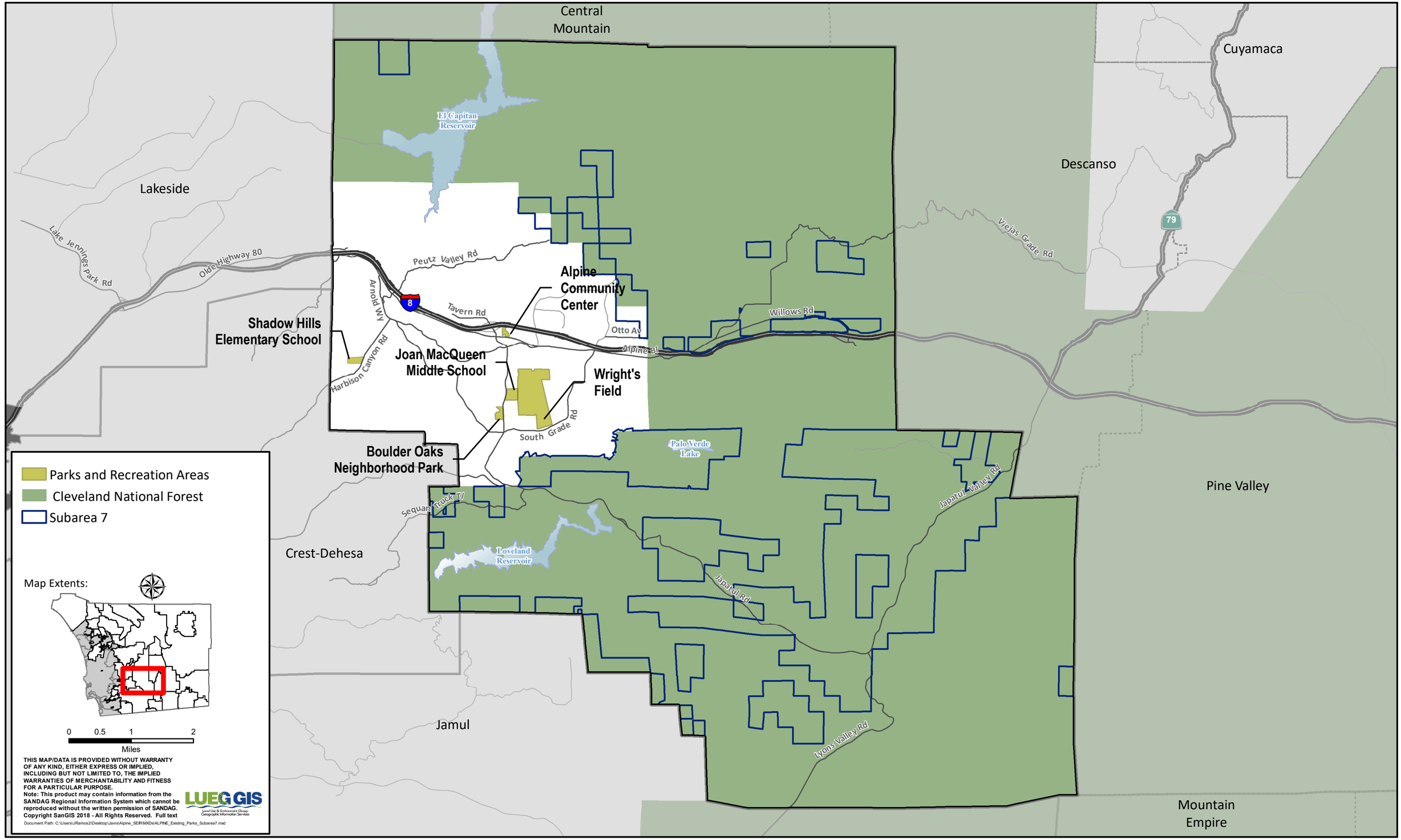
2.12.7.2 Issue 2: Require Construction or Alteration of Recreational Facilities

Implementation of the Alpine CPU would increase future development in the Alpine CPA, which would require the need for new or expanded recreational facilities to meet the County's minimum LOS standard of 3 acres of parks per 1,000 residents. Therefore, the proposed project could result in the construction or expansion of recreational facilities, which may have an adverse effect on the environment. The overall impacts related to the construction of new or expanded recreational facilities would be more severe than those described in the prior EIRs. Therefore, the proposed project would result in a potentially significant impact to the environment as a result of the construction of new or expanded recreational facilities (Impact-REC-2). The proposed project in conjunction with subsequent projects would also result in a potentially significant cumulative impact (Impact-C-REC-2). However, for the reasons described above, the application of existing regulations in combination with the adopted General Plan policies identified in Section 2.12.3.2 and prior EIRs mitigation measures that require that Community Plans be updated to address recreational needs while preserving the Community's character, the regular monitoring of existing facilities through Resource Management Plans, and recreational development that corresponds to existing trails and recreational facilities in order to minimize environmental impacts, would mitigate direct and cumulative impacts to recreational facilities to **less than significant** and impacts **would not be cumulatively considerable**.



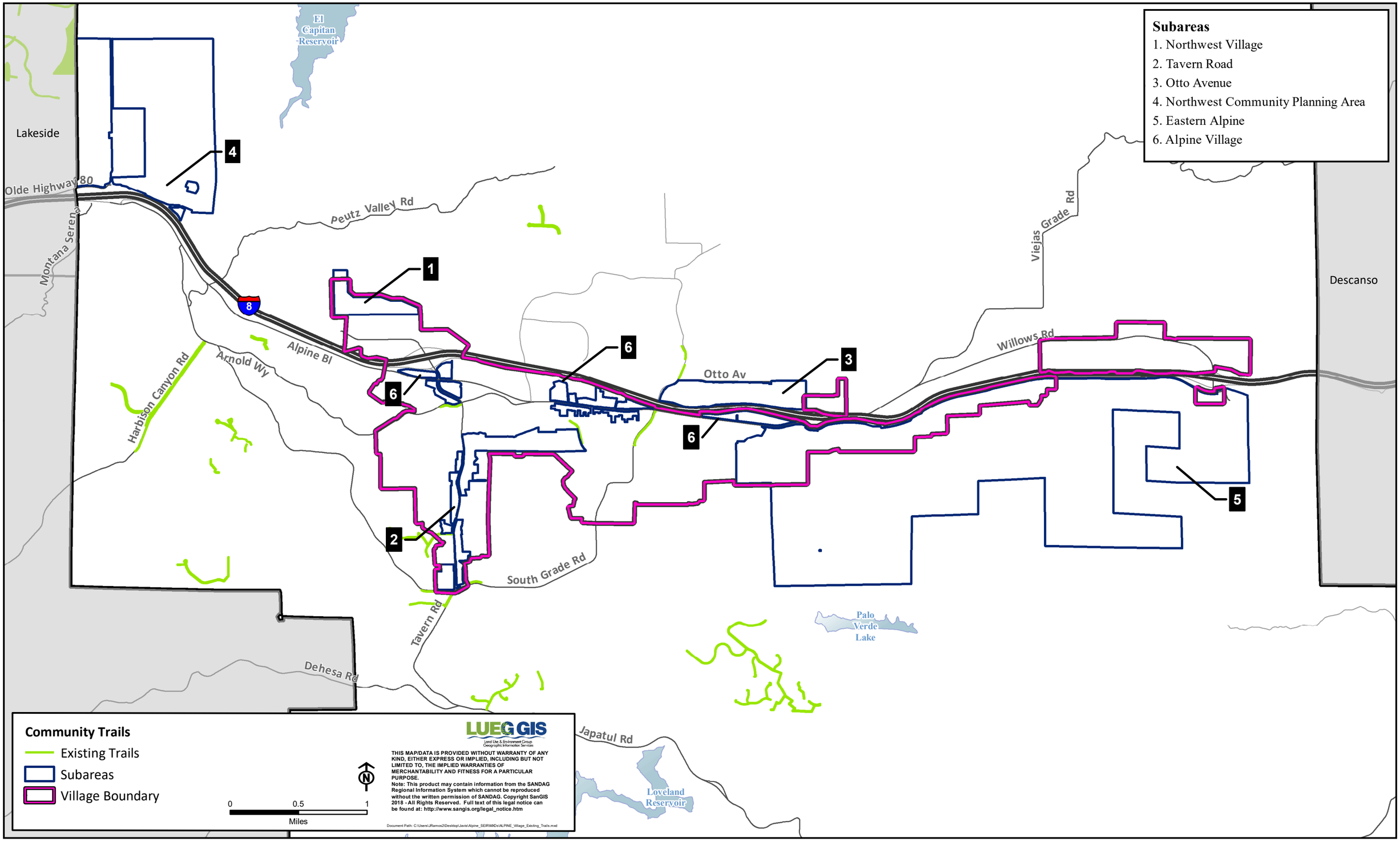
Source: SanGIS, County of San Diego, 2019

Figure 2.12-1a
Existing Parks
Subareas 1-6



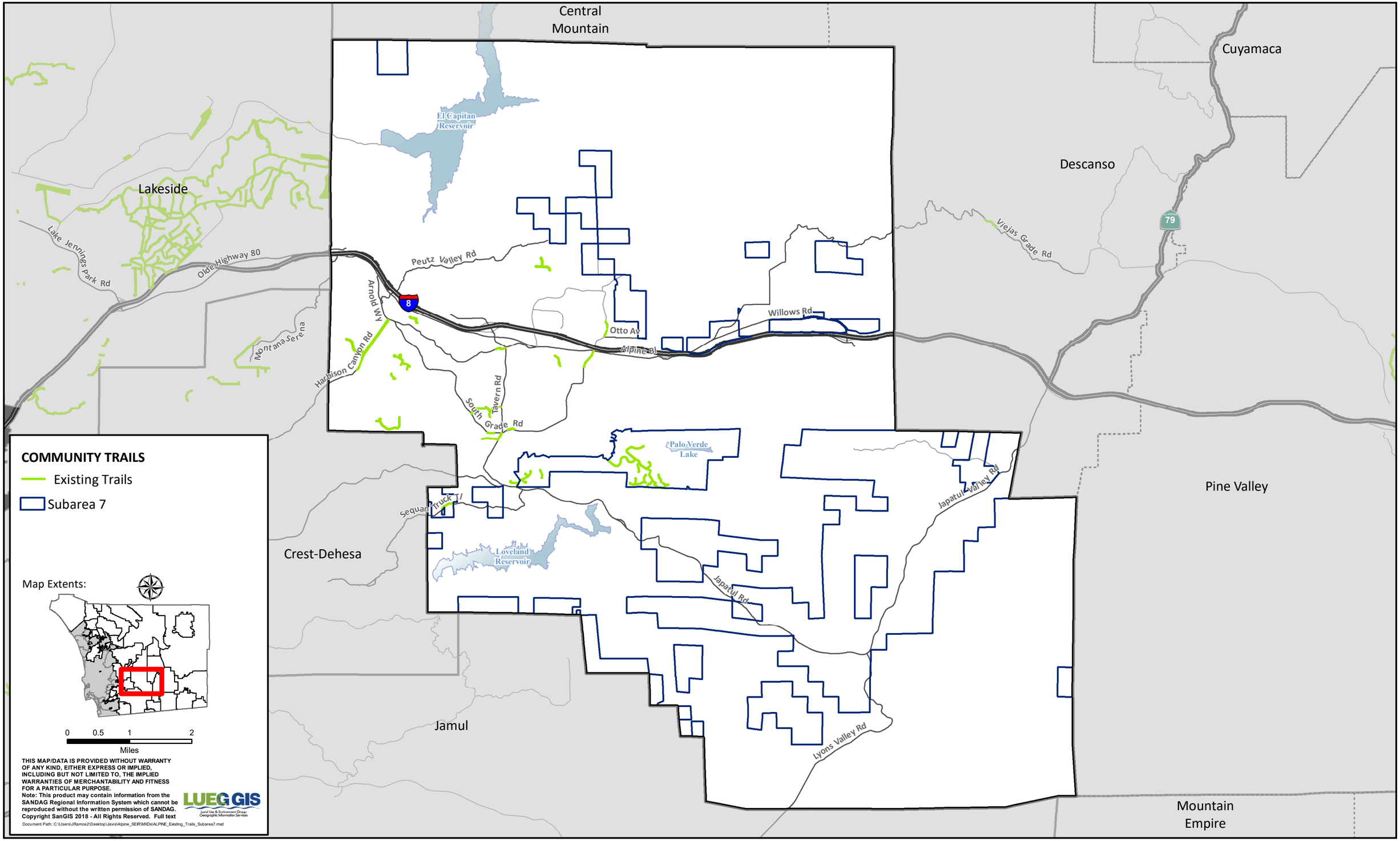
Source: SanGIS, County of San Diego, 2020

Figure 2.12-1b
Existing Parks
Subarea 7



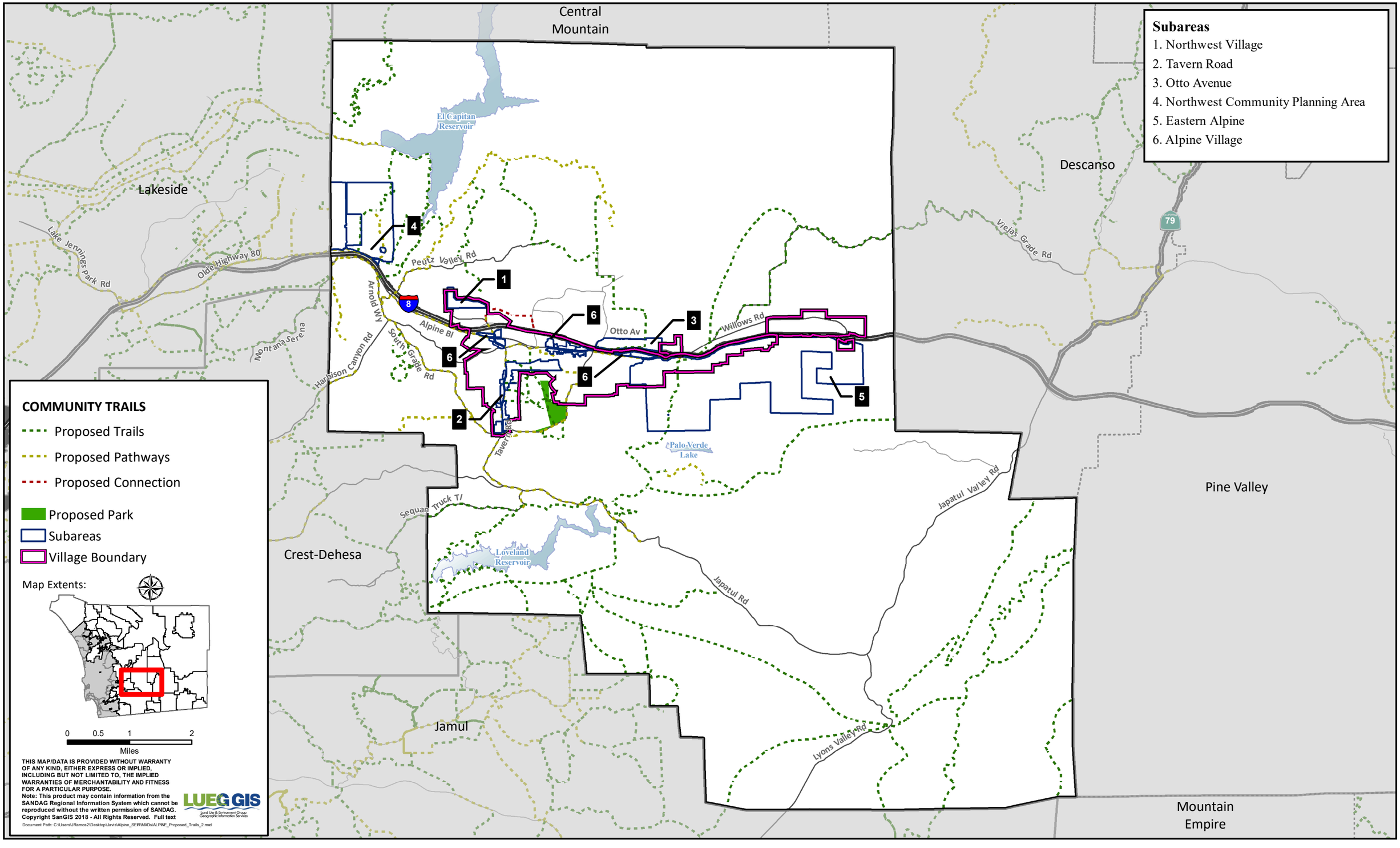
Source: SanGIS, County of San Diego, 2019

Figure 2.12-2a
Existing Trails
Subareas 1-6



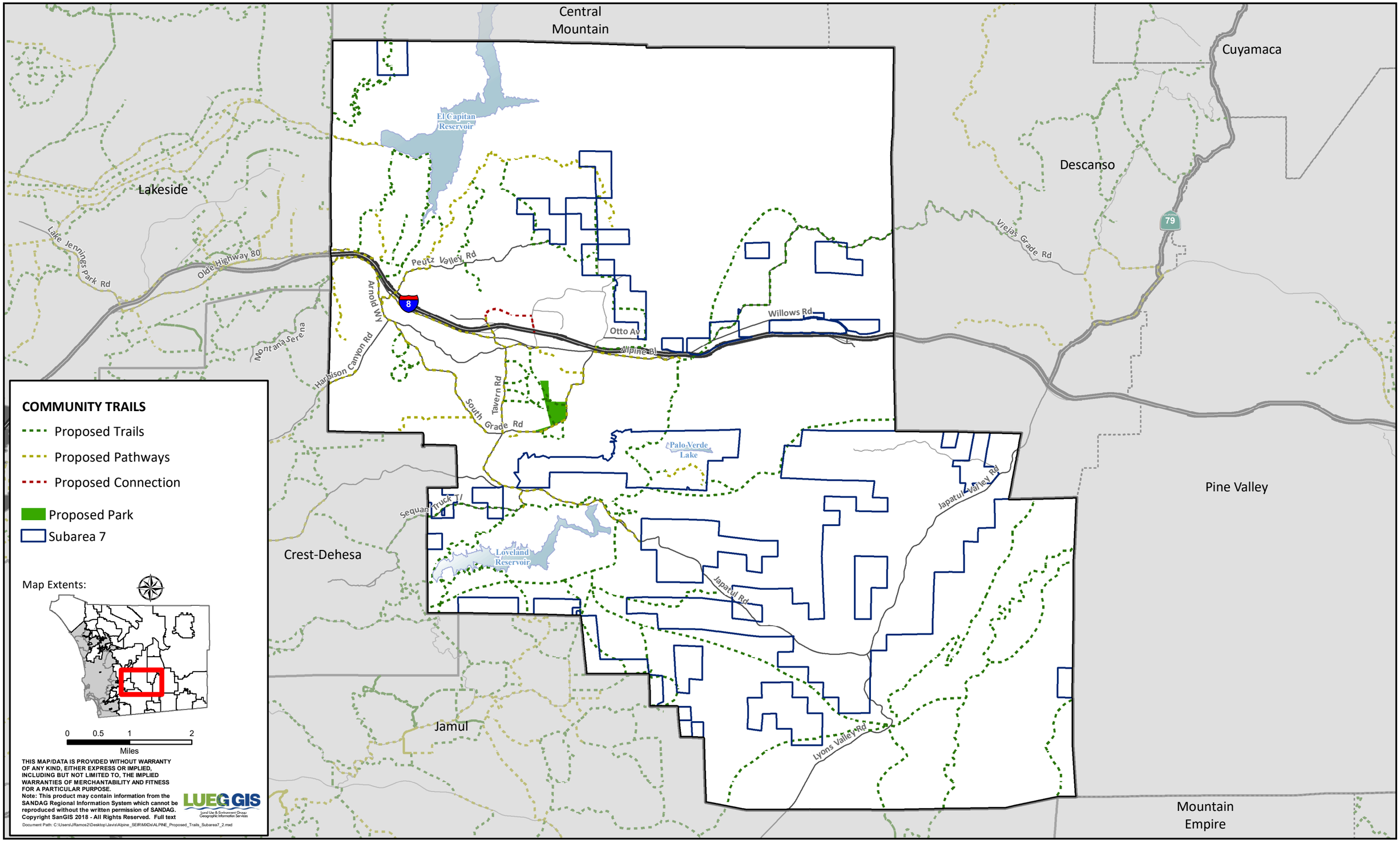
Source: SanGIS, County of San Diego, 2019

Figure 2.12-2b
Existing Trails
Subarea 7



Source: SanGIS, County of San Diego, 2019

Figure 2.12-3a
Proposed Trails and Parks
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.12-3b
Proposed Trails and Parks
Subarea 7

2.13 Transportation and Traffic

This section of the Supplemental Environmental Impact Report (SEIR) summarizes information from the Traffic Impact Study prepared by Chen Ryan and Associates (Attachment G of this SEIR). The Traffic Impact Study evaluates existing conditions for the transportation facilities within the Alpine Community Plan Area (CPA), as well as the potential transportation and traffic impacts that could result from implementation of the proposed project.

This section incorporates information and analysis from the 2011 General Plan EIR as it applies to the proposed project. Section 1.3 (Project Background) of this SEIR provides a background for both the 2011 General Plan EIR and the 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this EIR as "prior EIRs"). The 2011 General Plan EIR analyzed the entirety of the Alpine CPA, while the FCI EIR provided an updated analysis of impacts of land use changes within the former FCI lands. Only the 2011 General Plan EIR will be used for analysis of transportation and traffic due to the outcome of litigation of the FCI GPA.

Table 2.13-1 summarizes the impact conclusions identified in this section.

Table 2.13-1. Transportation and Traffic Summary of Impacts

Issue Number	Issue Area	Prior EIR Conclusions	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
TRA-1	Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
TRA-2	Exceed Threshold for Vehicle Miles Traveled (VMT)	Not Applicable[1]	Potentially Significant	Potentially Significant	Significant and Unavoidable
TRA -3	Substantially Increase Hazards Due to a Design Feature	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
TRA -4	Result in Inadequate Emergency Access	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant

[1]The 2011 General Plan EIR determined significance for level of service not vehicle miles traveled, as Senate Bill 743 did not have an effective date until July 1, 2020.

Comments received in response to the Notice of Preparation (NOP) related to transportation and traffic included suggestions to use transportation demand management (TDM) to minimize impacts on increased traffic, requests to maintain the rural and small-town nature of Alpine, and requests for road repairs. These concerns are addressed and summarized in this section. Specifically, issues regarding the use of TDM and road repairs are included in Section 2.13.3 below. A copy of the NOP and comment letters received in response to the NOP is included in Appendix A of this SEIR.

2.13.1 Existing Conditions

This section describes the existing roadway network and vehicle miles traveled (VMT) setting of the Alpine CPA. This section also identifies the existing transit (bus and rail) services within the Alpine CPA and existing bicycle and pedestrian systems in the Alpine CPA. Section 2.15.1 of the General Plan EIR included a discussion of the existing conditions related to transportation and traffic in the unincorporated County based on level of service (LOS). In 2013, Senate Bill (SB) 743 was enacted, with an implementation date of July 1, 2020, requiring public agencies to no longer utilize LOS for traffic analysis and instead utilize VMT. The existing condition of the current General Plan for the Alpine CPA was modeled by San Diego Association of Governments (SANDAG) and is included below.

2.13.1.1 Roadway Network

The existing roadway network in the unincorporated County includes freeways, expressways, prime arterials, major roads, boulevards, collector roads, rural light collector roads, and rural mountain roads. Roadways are grouped in similar types, the three groups being State highways, Mobility Element roadways, and local public roads. Mobility Element roadways refer to the existing portion of the County Mobility Element roadway system that has been constructed. There are 100 lane miles of Mobility Element roads and 27 lane miles of local public roads in the Alpine CPA (County of San Diego 2016).

The study area for the proposed project includes the General Plan Mobility Element roadways within the Alpine CPA. Table 2.13-2 identifies the roadway segments in the Alpine CPA, and Figures 2.13-1a and 2.13-1b show the location of these roadway segments.

Table 2.13-2. Alpine CPA Roadway Segments

Mobility Element ID[1]	Roadway	From	To	Classification
1	Old Highway 80	Lakeside Community Boundary	Chocolate Summit Drive	2.2B Light Collector
2	Chocolate Summit Drive/Broad Oaks Road	Old Highway 80	Chocolate Creek Road	2.2E Light Collector
2	Chocolate Summit Drive/Broad Oaks Road	Chocolate Creek Road	Lakeside Community Boundary	2.3C Minor Collector
3	Alpine Boulevard	Dunbar Lane	Arnold Way	4.1B Major Road
3	Alpine Boulevard	Arnold Way	Tavern Road	2.1D Community Collector
3	Alpine Boulevard	Tavern Road	South Grade Road	2.2A Light Collector
3	Alpine Boulevard	South Grade Road	West Willows Road	2.1D Community Collector
3	Alpine Boulevard	West Willows Road	East Willows Road	2.1C Community Collector
4	Harbison Canyon Road	Arnold Way	Bridle Run	2.2A Light Collector
4	Harbison Canyon Road	Bridle Run	Crest/Dehesa Community Boundary	2.2C Light Collector

Mobility Element ID[1]	Roadway	From	To	Classification
5	Arnold Way	Alpine Boulevard (western intersection)	South Grade Road	2.2C Light Collector
5	Arnold Way	South Grade Road	Foss Road	2.2F Light Collector
5	Arnold Way	Foss Road	Tavern Road	2.2C Light Collector
5	Arnold Way	Tavern Road	Alpine Boulevard (near West Victoria Drive)	2.2A Light Collector
6	Foss Road	Arnold Way	South Grade Road	2.2E Light Collector
7	South Grade Road	Arnold Way	Via Viejas	2.2E Light Collector
7	South Grade Road	Via Viejas	Alpine Boulevard	2.2C Light Collector
8	Tavern Road	New Road 11	Arnold Way	4.1A Major Road
8	Tavern Road	Arnold Way	South Grade Road	2.2D Light Collector
8	Tavern Road	South Grade Road	Japatul Road	2.2E Light Collector
9	Dehesa Road	Crest/Dehesa Community Boundary	Tavern Road	2.2E Light Collector
10	Japatul Road	Tavern Road	Japatul Valley Road	2.2F Light Collector
11	New Road 11	Victoria Park Terrace	Tavern Lane	2.3A Minor Collector
12	West Willows Road	Willows Road	Alpine Boulevard	2.2E Light Collector
13	Victoria Park Terrace	Tavern Road (at Tavern Lane)	West Victoria Drive	2.2A Light Collector
14	New Road 14	Tavern Road (at Tavern Lane)	West Victoria Drive	Local Public Road
15	West Victoria Drive	Alpine Boulevard	Victoria Park Terrace	2.2E Light Collector
16	North/East Victoria Drive	Victoria Park Terrace	Otto Avenue	2.2F Light Collector
16	North/East Victoria Drive	Otto Avenue	South Grade Road	2.2C Light Collector
17	Otto Avenue	East Victoria Road	West Willows Road	2.2C Light Collector
18	New Road 18	Alpine Boulevard at West Victoria Drive	Eltinge Drive at Marshall Road	Local Public Road
19	Willows Road	Otto Avenue/West Willows Road	Viejas Casino Area	2.2E Light Collector
19	Willows Road	Viejas Casino Area	Interstate 8 (I-8) westbound on-ramp (Exit 36)	4.2A Boulevard
19	Willows Road	I-8 westbound on-ramp at Willows Road	Alpine Boulevard	4.1A Major Road

Mobility Element ID[1]	Roadway	From	To	Classification
20	Japatul Valley Road	Japatul Road	Central Mountain Subregion Boundary	2.2F Light Collector
21	Lyons Valley Road	Japatul Road	Jamul/Dulzura Subregion Boundary	2.2F Light Collector
22	Viejas View Place	Alpine Boulevard	South Grade Road	Local Public Road
23	New Road 23	Victoria Circle	East Victoria Drive	Local Public Road
24	El Monte Road	Lakeside Community Boundary	El Capitan Reservoir	2.3C Minor Collector

[1] The Mobility Element identifications are depicted on Figure M-A-1, *Alpine Mobility Element Network* in the Mobility Element Network Appendix of the County's General Plan and noted on Figures 2.13-1a and 2.13-1b.
Source: County of San Diego 2016

2.13.1.2 Vehicle Miles Traveled

VMT is the total number of miles traveled by motor vehicles within Alpine, including trips to/from and within the community. The VMT generated for the Alpine CPA existing conditions (i.e., base year 2012) were derived from the SANDAG Series 13 Regional Travel Demand Model Activity Base Model (ABM). The ABM is a travel demand forecasting model that incorporates census data and travel surveys to inform the algorithms of the model's projections. SANDAG's Regional ABM was customized for the Alpine CPA and calibrated at the local level using detailed land use inputs obtained from assessor's parcel data within the Alpine community and incorporated local transportation network refinements to better match ground conditions in 2012.

The following definitions describes how VMT is referred to, calculated, and accounted for in the Alpine CPA:

- Resident VMT/Capita (VMT/Capita) includes all vehicle-based resident travel grouped and summed to the home location of the individual. It includes *all* resident vehicle travel: home-based and non-home based. The VMT is then summed for all individuals residing in the community and divided by the population of the community to arrive at Resident VMT/Capita.
- Employee VMT/Employee (VMT/Employee) includes all vehicle-based employee travel grouped and summed to the work location of the individual. This includes *all* employee travel, not just work-related trips. The VMT for each work location is then summed for all work locations in the community and divided by the number of employees within the community to arrive at Employee VMT/Employee. This does not include employees whose work location is specified as home.
- Net Retail VMT Increase Associated with Retail. At this time, the SANDAG model cannot isolate the VMT associated with retail uses in a similar fashion as it does with the VMT associated with residential and employment uses. Therefore, the external VMT associated with the retail uses within the community were isolated outside of the model by subtracting the VMT associated with employees and residents within the community from the total VMT generated within the community. The remaining VMT would be associated with external patrons coming into the community to access retail or other commercial uses. If the external VMT associated with retail was identified to be higher than baseline (ground conditions) external VMT associated with retail use, then the alternative was considered a significant impact. This is consistent with the retail

standards outlined in the County's Transportation Study Guide (TSG) since it measures an increase in the net VMT, which is specifically associated with the proposed retail uses. It should be noted that this is a conservative analysis since it can be assumed that some of the external VMT may not be associated with retail uses; however, this is assumed to be an insignificant portion of the external VMT and is not anticipated to change the findings.

- Total VMT is the total daily VMT within the Alpine CPA. The total VMT is derived from multiplying the daily volume on everyday roadway segments by the length of every roadway segment within Alpine.

The VMT generated under the current General Plan establishes the baseline in which planned development is compared to identify cumulative transportation-related impacts. The current General Plan conditions represent buildout of the land uses and mobility network assumed within the County's current General Plan, including those within the Alpine CPA. Table 2.13-3 summarizes the projected population employment, total VMT, VMT/capita, and VMT/employment within the Alpine CPA for the base year 2012 as derived from the respective SANDAG Series 13 Model runs. As shown in Table 2.13-3, as the population within the CPA increases, so does the total VMT.

Table 2.13-3. Existing VMT Summary

Scenario	Population[1]	Employment	Total VMT	VMT/ Capita	VMT/ Employment
Base Year (2012)	17,988	6,774	947,833	34.23	44.64
Current General Plan	33,231	11,855	1,487,583	25.62	33.97

[1]Total population within the Alpine Community Planning Area, based on San Diego Association of Governments Series 13 Model projections.
VMT = Vehicle Miles Traveled
Source: Appendix G

2.13.1.3 Transit Services

Bus and rail service are the primary modes of public transportation that serve the needs of unincorporated County residents. The San Diego Metropolitan Transit System (MTS) is the region's largest provider of transit services, including bus and trolley, and serves 275,000 riders each weekday. MTS provides two bus routes that serve the Alpine CPA, 838 and 888.

2.13.1.4 Bicycle and Pedestrian Systems

The San Diego County Active Transportation Plan (ATP) promotes active transportation through pedestrian and bicycle improvements throughout the unincorporated County. The ATP consists of an update to the County's Bicycle Transportation Plan (dated 2008) and the Pedestrian Area Plans (prepared for Alpine, Borrego Springs, Fallbrook Town Center, Lakeside Town Center and Spring Valley) into one combined ATP. The ATP was approved by the Board of Supervisors on October 31, 2018. The ATP identifies goals, objectives, and actions related to improving safety to reduce auto collisions with cyclists and pedestrians, increasing accessibility and connectivity with an active transportation network, and improving public health by encouraging walking and biking. The plan identifies existing and proposed bikeways, and classifies bikeways into three types of bicycle facilities: bike path, bike lane, and cycle track. Bike paths refer to paths that provide for bicycle travel on a paved right-of-way completely separated from any street or highway. A bike lane provides a striped and stenciled lane for one-way travel on a street or highway. Cycle tracks provide a physically separated bikeway for the exclusive use of bicycles. All

County roadways (excluding freeways, except where allowed by California Department of Transportation [Caltrans]) are open for travel by bicycle, regardless of bikeway treatment.

2.13.2 Regulatory Framework

Chapter 2.15.2 of the 2011 General Plan EIR describes the Regulatory Framework related to transportation and traffic and are hereby incorporated by reference. The federal and State regulatory framework discussion in these prior EIR regarding transportation and traffic has not changed since adoption and are therefore not repeated here. SB 743 was signed into effect in 2013 with an implementation date set for July 1, 2020. Therefore, while the 2011 General Plan EIR included VMT numbers for the unincorporated County, including the Alpine CPA, it did not include a significance analysis for VMT as currently required under SB 743. Therefore, a discussion of SB 743 is provided below. The majority of the local regulatory discussion in the prior EIR regarding transportation and traffic remain applicable to the proposed project. However, SANDAG's Regional Transportation Plans and Programs and the County's Transportation Impact Fee Ordinance have been updated and are reflected below. It should be noted that the County is currently undertaking a comprehensive update of the Land Development Code, which includes the County's Zoning Ordinance and could result in revisions to the local regulations listed below.

Applicable federal regulations include:

- Americans with Disabilities Act (ADA)
- Highway Capacity Manual
- Title, Code of Federal Regulations
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users

Applicable State regulations include:

- Caltrans Standards
- Statewide Transportation Improvement Program
- Transportation Development Act (TDA)

In addition to the above, the following State regulations related to transportation and traffic have been adopted/updated since adoption of the 2011 General Plan Update EIR.

2.13.2.1 Senate Bill 743

Governor Jerry Brown signed SB 743 on September 27, 2013, which mandated a change in the way public agencies evaluate transportation impacts of projects under the California Environmental Quality Act (CEQA), focusing on VMT rather than LOS and other delay-based metrics. SB 743 states that new methodologies under CEQA are needed for evaluating transportation impacts that are better able to balance congestion management with the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and to support infill development. SB 743 indicates that measurements of transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. Accordingly, SB 743 required the Governor's Office of Planning and Research to amend the CEQA Guidelines Section 15064.3(c) to reflect these changes. The CEQA-mandated implementation date for SB 743 is July 1, 2020.

Applicable local regulations include:

- Community Plans
- County Zoning Ordinance, Parking Regulations, Section 6750-6799
- San Diego County Public Road Standards

- San Diego County Private Road Standards
- County of San Diego Consolidated Fire Code
- County Community Right-of-Way Development Standards
- Congestion Management Program

To comply with SB 743, the County of San Diego adopted a new TSG on June 24, 2020, that identifies VMT analysis methodologies, establishes VMT thresholds for CEQA transportation impacts, and identifies initial mitigation strategies. The TSG provides guidance for the methodology and thresholds utilized to evaluate transportation-related impacts.

Other applicable local regulations adopted/updated since the adoption of the General Plan in 2011 are described below.

2.13.2.2 SANDAG San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan) combines and updates the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy for the San Diego Region into one plan. The Regional Plan anticipates the growth that will occur in the region and provides a blueprint for a regional transportation system, while also establishing the region's sustainable community strategy with the overarching vision of promoting sustainability and offering more mobility options for people and goods. The Regional Plan goals are structured into three overarching themes: Healthy Environment & Communities, Innovative Mobility & Planning, and Vibrant Economy. The Regional Plan also identifies six general categories of policy objectives and, within each, specific policy objectives. The policy objective categories are Habitat and Open Space Preservation, regional Economic Prosperity, Environmental Stewardship, Mobility Choices, Partnerships/Collaboration, and Healthy and Complete Communities.

2.13.2.3 2018 Regional Transportation Improvement Program

The 2018 Regional Transportation Improvement Program is a multi-billion-dollar 5-year program of major transportation projects funded by federal, State, TransNet local sales tax, and other local and private funding covering fiscal year 2016/2017 to 2020/2021. The program development process, which includes the air quality emissions analysis for all regionally significant projects, requires approval by the Federal Highway Administration and the Federal Transit Administration.

The Regional Transportation Improvement Program is a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation-related air pollution in support of efforts to attain federal and State air quality standards for the region. The program also incrementally implements the Regional Plan, which is the long-range transportation plan for the San Diego region (SANDAG 2015).

2.13.2.4 County of San Diego Regulatory Ordinances, Sections 77.201 – 77.220, Transportation Impact Fee

The Transportation Impact Fee (TIF) program provides funding for mitigation of cumulative impacts and for proportional construction of transportation facilities needed to support traffic generated by new development to meet State law requirements. Per the County Board of Supervisors ordinance, effective December 31, 2012, the County will collect TIF at or before building permit issuance for projects that generate new trips.

2.13.2.5 County of San Diego General Plan Policies

The General Plan includes goals and policies that address transportation and traffic within the Mobility, Land Use, and Safety elements. These goals and policies are summarized below.

Mobility Element

Policy M-1.1: Prioritized Travel within Community Planning Areas. Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.

Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.

Policy M-1.3: Treatment of High-Volume Roadways. To avoid bisecting communities or town centers, consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads through landscaping, design, and/or careful location of facilities.

Policy M-2.1: Level of Service Criteria. Require development projects to provide associated road improvements necessary to achieve an LOS of "D" or higher on all Mobility Element roads except for those where a failing LOS has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with LOS E/F). When development is proposed on roads where a failing LOS has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.

Policy M-2.2: Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.

Policy M-2.3: Environmentally Sensitive Road Design. Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce roadkill and to direct animals to under crossings.

Policy M-3.1: Public Road Rights-of-Way. Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.

Policy M-3.2: Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, and pedestrian, bicycle and equestrian facilities.

Policy M-3.3: Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law, and local regulations.

Policy M-4.2: Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in village and rural villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.

Policy M-4.3: Rural Roads Compatible with Rural Character. Design and construct public roads to meet travel demands in semi-rural and rural lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. (See applicable community plan for possible relevant policies.)

Policy M-4.4: Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

Policy M-4.5: Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.

Policy M-5.1: Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map.
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing VMTs.
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands.
- Maximized efficiency to enhance connectivity between different modes of travel.

Policy M-5.2: Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new State freeways or highways and to reduce impacts of road improvements and/or design modifications to State facilities on adjacent communities.

Policy M-8.1: Maximize Transit Service Opportunities. Coordinate with SANDAG, the Consolidated Transportation Services Agency (CTSA), North County Transit District (NCTD), and MTS to provide capital facilities and funding, where appropriate, to:

- Maximize opportunities for transit services in unincorporated communities.
- Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit-only lanes.
- Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible.
- Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops.

Policy M-8.2: Transit Service to Key Community Facilities and Services. Locate key county facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit

in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit.

Policy M-8.3: Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership and designate such locations as part of planning efforts for town centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of town centers and village cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit-oriented development, when appropriate.

Policy M-8.4: Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.

Policy M-8.5: Improved Transit Facilities. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.

Policy M-8.6: Park and Ride Facilities. Coordinate with SANDAG, Caltrans, and tribal governments to study transit connectivity and address improving regional opportunities for park-and-ride facilities and transit service to gaming facilities and surrounding rural areas to reduce congestion on rural roads.

Policy M-8.7: Inter-Regional Travel Modes. Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated County residents.

Policy M-9.1: Transportation Systems Management. Explore the provision of operational improvements (i.e., adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.

Policy M-9.2: Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.

Policy M-9.3: Preferred Parking. Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. Encourage parking cash out programs to reimburse employees for the cost of "free" on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements.

Policy M-9.4: Park-and-Ride Facilities. Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.

Policy M-10.1: Parking Capacity. Require new development to:

- Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity;
- Provide parking facilities for motorcycles and bicycles; and

- Provide staging areas for regional and community trails.

Policy M-10.2: Parking for Pedestrian Activity. Require the design and placement of on-site automobile, motorcycle, and bicycle parking in villages and rural villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.

Policy M-10.3: Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.

Policy M-10.4: Shared Parking. Support town center plans when desired by the community that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.

Policy M-11.1: Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.

Policy M-11.2: Bicycle and Pedestrian Facilities in Development. Require development and town center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities. This will include both on-street facilities as well as off-street bikeways to safely serve the full range of intended users. Also designate areas for transit facilities, where appropriate and coordinated with the transit service provider.

Policy M-11.3: Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in semi-rural and rural lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.

Policy M-11.4: Pedestrian and Bicycle Network Connectivity. Require development in villages and rural villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and county-wide networks.

Policy M-11.5: Funding for Bicycle Network Improvements. Seek outside funding opportunities for bicycle and pedestrian network improvement projects, particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, park-and-ride facilities, and major transit stops.

Policy M-11.6: Coordination for Bicycle and Pedestrian Facility Connectivity. Coordinate with Caltrans to provide alternate connections for past, existing, or planned bicycle and pedestrian routes that were or would be severed by State freeway and highway projects that intersect pathways or divide communities. Caltrans endeavors to provide safe mobility for all users, including bicyclists, pedestrians, transit riders, and motorists appropriate to the function and context of the facility. Caltrans is committed to working with the County to complete bicycle and pedestrian.

Policy M-11.7: Bicycle and Pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

Land Use Element

Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within villages and rural villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

Policy LU-5.4: Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.

Policy LU-5.5: Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated, and acceptable alternative routes are implemented. Examples include large parking areas that cannot be crossed by non-motorized vehicles, and new developments that block through access on existing or potential bicycle and pedestrian routes.

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

Policy LU-9.8: Village Connectivity and Compatibility with Adjoining Areas. Require new development within villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas. (See applicable community plan for possible relevant policies.)

Policy LU-10.4: Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in semi-rural and rural areas that are outside of villages (including rural villages) to minimize vehicle trips and environmental impacts.

Policy LU-11.6: Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.

Policy LU-11.8: Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high-impact industrial uses.

Policy LU-12.2: Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.

Safety Element

Policy S-3.4: Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-3.5: Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.

Policy S-14.1: Vehicular Access to Development. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

2.13.2.6 Alpine CPU Policies

There are specific Alpine Community Plan (Alpine CPU) goals and policies in the land use, mobility, noise, and safety elements relevant to transportation and traffic, which are summarized below.

Land Use Element

Goal LU-1 is proposed to capitalize on the economic opportunity afforded by Interstate 8 (I-8) and the regional access it provides. Policy LU-1.1 meets this goal by designating three I-8 interchanges (Tavern Road, West Willows, and East Willows) as commercial quadrants.

Goal LU-2 recommends strengthening and enhancing commercial activity in the core of Alpine. Policy LU-2.1 refines this goal by encouraging commercial and mixed-use development along Alpine Boulevard between Tavern Road and West Willows on/off ramps to reinforce its role as the "main street" of Alpine.

Goal LU-8 promotes the early designation of a scenic highway system that will provide scenic travel routes within the Alpine CPA. Policy LU-8.1 identifies three scenic vistas/view corridors along I-8 looking north and south through Peutz Valley and east and west views of Viejas Mountains.

Mobility Element

Goal M-1 works to support a multi-modal transportation system that serves the general convenience and safety of Alpine citizens and enhances the beauty and quality of the built environment. Policies M-1.1 and M-1.2 promote general convenience of carpooling or multi-modal transportation through encouraging park-and-ride lots, and future development near existing and planned transit stops. Policies M-1.3 and M1.4 encourage traffic calming along Willows Road (between the Viejas Reservation and the west Willows Road I-8 on/off ramps South Grade Road), South Grade Road, Arnold Way, Tavern Road (between Alpine Boulevard and South Grade Road), Alpine Boulevard (between Tavern Road and the west Willows Road I-8 on/off ramps), and school sites; and traffic circles/roundabouts where appropriate. Policy M-1.5 recommends road capacity improvements at the western intersection of Arnold Way and Alpine Boulevard. Policy M-1.7 supports improved circulation access from Harbison Canyon Road to Alpine Boulevard and I-8 via Arnold Way. Policy M-1.8 recommends road designs in industrial areas so industrial traffic will not use nearby residential streets for access or circulation. Policies M-1.6, M-1.9 and M-1.10 encourage replacement of all trees lost during road construction and renovation projects; encourage streetscape designs that promote walkability, such as shade and benches; and support walkways in residential communities and around existing and future school sites.

Noise Element

Goal N-1 proposes to maintain the tranquility of residential neighborhoods by reducing potential noise pollution. Policy N-1.1 encourages land use and circulation patterns that will minimize noise in residential neighborhoods.

Safety Element

Goal S-1 promotes the establishment of emergency procedures and preventative measures to minimize damage from fire, geologic hazards, crime occurrence, and hazardous substances. Policy S-1.4 supports this goal by recommending the establishment of alternative means of ingress and egress to and from Palo Verde Ranch and/or other existing neighborhoods.

2.13.3 Analysis of Project Effects and Determination as to Significance

Based on guidance provided in Appendix G of the State CEQA Guidelines and the County's Transportation Study Guide (2020), the proposed project would result in a significant impact if it would:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
- Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

2.13.3.1 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System; including Transit, Roadway, Bicycle, or Pedestrian Facilities

Guidelines for the Determination of Significance

The Alpine CPU would have a significant impact if it would conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

As noted in Appendix G of the CEQA Guidelines Section 15064.3 subdivision (b), the determination of significant hazards to pedestrians or bicyclists shall consider the following factors:

- Projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.
- Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Impact Analysis

The prior EIR concluded that the 2011 General Plan would result in a potentially significant impact on traffic and LOS, and specific implementation programs were identified as mitigation. Impacts related to conflicts with applicable plans, ordinances, and policies that deal with the effectiveness of the circulation system can be found in Sections 2.15.3.1 and 2.15.3.2 of the 2011 General Plan EIR and is incorporated by reference. Implementation of the 2011 General Plan resulted in a total of 136 deficient roadway segments through the unincorporated County, resulting in a total of 253 deficient lane miles as roadway segments. While it was an improvement over existing conditions at the time of implementation, a total of 253 roadway lane miles exceeded the LOS standard established by the County, and impacts on traffic and LOS with implementation of the General Plan were significant and unavoidable. General Plan policies and mitigation were implemented to reduce impacts related to LOS standards by requiring land use decisions that would result in the reduction of VMTs; creating a TIF ordinance to apply impact fees to development; coordinating with other jurisdictions to enhance connectivity with different modes of travel and during planning and designing of new roadway infrastructure; and requiring large commercial and office developments to prepare TDM programs to reduce use of single-occupant vehicles.

These policies and mitigation measures would help reduce impacts related to increased traffic on roadways by providing alternate means of transportation, and creating a land use pattern that allows for alternate means of transportation (walking, bicycling, transit, etc.), which would reduce the overall number of cars on the road. However, because the effectiveness of these measures could not be quantified or assured, this impact remained significant and unavoidable.

The discussion of impacts related to conflicts with applicable plans, ordinances, or policies related to the effectiveness of the circulation system can be found in Sections 2.15.3.1 and 2.15.3.2 of the 2011 General Plan EIR and the discussion of impacts related to conflicts with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks) can be found in Section 2.15.3.6 of the 2011 General Plan EIR and are hereby incorporated by reference. General Plan policies and mitigation measures would reduce this impact to less than significant levels by requiring community plans to establish policies and design guidelines to encourage compact walkable routes; establishing planning principles for transit nodes, coordinating with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities and expand mass transit opportunities; implementing and revising of the County ATP every 5 years to identify a long-range bicycle network and coordinating with SANDAG for development of the Regional Bicycle Plan; and implementing of the County Trails Program.

The proposed project would result in an increase in the density and development potential for three of the seven subareas (Subareas 2, 4 and 6). The proposed new land use designations would allow up to 6,078 dwelling units in Subareas 1 through 7; approximately 2,013 dwelling units above the number of maximum units under the current General Plan. The prior EIR concluded that the 2011 General Plan had the potential to result in a potentially significant impact on traffic and LOS, and specific implementation programs were identified as mitigation. As stated above in Section 2.13.1 and 2.13.2, current regulation requires the use of VMT as the metric to measure traffic impacts. Therefore, the proposed project is analyzed for consistency with the new VMT policies and plans in Issue 2 below. As further discussed under Issue 2, the project would exceed the residential, employee, and retail VMT thresholds; and therefore, the proposed project would not be consistent with VMT policies.

Subareas 2, 4, and 6 are located near existing transportation infrastructure including I-8 and Alpine Boulevard. There are two bus routes (838 and 888) that service the Alpine CPA. Route 838 provides access along Alpine Boulevard and between Willows Road and Viejas Casino (along Subareas 6 and 7), and route 888 travels from Jacumba/Campo to El Cajon and also provides access along Alpine Boulevard (Subarea 6). There is also an on-demand bus service (MTS Access), which provides service to the public with physical, cognitive, and visual disabilities. The proposed project would introduce higher density residential uses within Subareas 2, 4, and 6. Portions of Subareas 2 and 4, and all of Subarea 6, are located within 0.5 mile of both routes 838 and 888.

Many roadways and intersections in the Alpine CPA do not currently have pedestrian or bicycle facilities. The roadways and intersections designed prior to adoption of current road standards may have conditions that could pose an increased risk if traffic volumes, pedestrian volumes, or bicycle volumes substantially increase along the road segment or at the intersection, as a result of the proposed project. Increased traffic generated or redistributed by the proposed project may cause a significant traffic operational impact on pedestrians or bicyclists, which would decrease the performance or safety of bicycle and pedestrian routes and would also be inconsistent with the policies identified to promote transit, bicycle, and pedestrian facilities. The determination of significant hazards to pedestrians or bicyclists would be addressed on a case-by-case basis, considering the following seven factors:

1. Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists;
2. Amount of pedestrian activity at the project access points that may adversely affect pedestrian safety;
3. Preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site;
4. Percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety;
5. Physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts;
6. Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable; and
7. Potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

Because this is a programmatic-level analysis, it is assumed that the Mobility Element will be fully built out, and all Mobility Element roadways and intersections will be designed to County standards and able to accommodate the appropriate bicycle and pedestrian demand. The proposed project would focus some of the higher density residential land use designations, including Subareas 2 and 6, near transit facilities (i.e., bus stops, etc.), which would be consistent with plans and policies in both the County's General Plan, including Policies LU-5.1 and M-8.3, as well as SANDAG's Regional Transportation Plan (RTP) to promote increased use of transit. However, the Alpine CPA subarea density increase has the potential to increase the pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, State, and local regulations identified in Section 2.13.2, Regulatory Framework, are applicable to the proposed project, and compliance with these existing regulations would reduce potential impacts to the circulation system. It would be required that transportation facilities proposed under the Alpine CPA be built in compliance with the existing County of San Diego Public Road standards. In addition, all new Alpine Community Plan Mobility Element roadways or roadway improvements would be required to be designed to accommodate the multi-modal facilities planned within the County of San Diego's ATP, and in accordance with the relevant policies in the County's General Plan Mobility Element.

The General Plan includes several policies within the Mobility and Land Use Elements that help reduce impacts associated with alternative modes of transportation. These include Policies LU-5.4, LU-5.5, M-3.1, M-8.1, M-8.2, M-8.4, M-8.5, M-8.7, M-8.10, M-11.1, M-11.2, M-11.3, M-11.4, M-11.5, M-11.6, and M-11.7. These policies require land use decisions that would result in compact, walkable development patterns within village and rural village designations; establishment of planning principles for transit nodes; coordination with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities and expand mass transit opportunities; funding for the County Bicycle Transportation Plan every 5 years to identify a long-range bicycle network and coordination with SANDAG for development of the Regional Bicycle Plan; and implementation of the County Trails Program.

The prior EIR identified mitigation measure Tra-1.1 through Tra-1.7 and Tra-2.1, which included the following:

- Coordination with SANDAG and adjacent cities during updates to the RTP to identify a transportation network that maximizes efficiency and enhances connectivity between different modes of transportation;
- Coordination with Caltrans and adjacent jurisdictions during planning and design for improvement to the freeway and state highway network;
- Implementation of County Public Road Standards during review of a new development project, County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects, and Congestion Management Strategies identified in the RTP;
- Requirements for large projects to mitigate impacts to State highways and freeways;
- Development procedures to require large commercial and office developments to use the TDM program;
- Implementation of the County's TIF Ordinance; and
- Coordination with other jurisdictions when development projects result in significant impacts on city roads.

Summary

The proposed project would allow for a greater number of housing units within Subareas 2, 4, and 6 of the Alpine CPA, which are located within 0.5 mile of a bus route stop along an existing transit corridor. However, the project would exceed the residential, employee and retail regional VMT thresholds, and therefore would not be consistent with the State or County-adopted VMT policies. In addition, the increased density generated by the proposed project would increase pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety. Implementation of the General Plan policies and compliance with existing regulations would reduce the proposed project's impacts related to the circulation systems, but not to a level below significant. Therefore, the proposed project would not be consistent with existing circulation system policies and would be considered a **significant impact** (**Impact-TRA-1**).

2.13.3.2 Issue 2: Exceed Thresholds for Vehicle Miles Traveled

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance (Transportation and Traffic), the proposed project would have a significant impact if it would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). In addition, the County's TSG notes for large land use plans, such as Specific Plans or Community Plan Updates, the land use plan should be compared to the region overall. A comparison to the region is appropriate because large land use plans can influence regional VMT. The following thresholds apply to large land use plans:

- *Residential*: Aggregate all residential land uses for the build-out year of the plan and compare to the existing regional average on a VMT per resident basis. The threshold is 15% below the existing regional average VMT per Resident.

- *Employment*: Aggregate all employment land uses for the build-out year of the plan and compare to the existing regional average on an VMT per Employee bases. The threshold is 15% below the existing regional average VMT per Employee.
- *Retail/Service*: Evaluate the effect that adding these land uses has on regional VMT. The threshold is any increase in regional VMT.

Based on the impact criteria, the proposed project's Mobility Element features could potentially induce travel based on the following criteria:

- *Route Changes*: Faster travel time may attract more drivers to a route with expanded capacity, which can increase or decrease vehicle travel depending on whether it shortens or lengthens trips.
- *Newly Generated Trips*: Increasing travel speeds from added roadway capacity could induce additional vehicle trips, resulting in increased VMT.

Impact Analysis

The prior EIR concluded that the General Plan would result in a potentially significant impact on unincorporated traffic and LOS. The prior EIR provided that the 2011 General Plan buildout conditions for the year 2030 would result in a total VMT of 361,102 for the Alpine CPU (County of San Diego 2011). However, as discussed above under Section 2.13.2 Regulatory Setting, SB 743 was enacted on September 27, 2013, with an effective date of July 1, 2020, and therefore a significance analysis was not prepared nor required for the prior EIR. SB 743 mandated a change in the way public agencies evaluate transportation impacts of projects under CEQA, focusing on VMT rather than LOS and other delay-based metrics. Therefore, a VMT analysis was prepared for the proposed project instead of an LOS analysis. The VMT generated for the Alpine CPA existing conditions (i.e., base year 2012), current General Plan, and proposed project were derived from the SANDAG Series 13 model.

Table 2.13-4 summarizes the projected population, employment, and VMT within the Alpine CPA for the proposed project.

Table 2.13-4. Alpine CPA VMT Summary

Scenario	Population[1]	Employment	Total VMT	VMT/Capita	VMT/ Employment
Base Year (2012)	17,988	6,774	947,833	34.23	44.64
Current General Plan	33,231	11,855	1,487,583	25.62	33.97
Proposed Project	40,622	12,736	1,724,540	24.41	31.79

[1] Total population within the Alpine community is based on San Diego Association of Governments' Series 13 model projections.
Source: Appendix G

Based on SANDAGs Series 13 model projections, the current General Plan would result in 1,487,583 total VMT for the Alpine CPA, and the proposed project would result in 1,724,540 total VMT for the Alpine CPA. Residential and employment-based land uses, retail land uses, and induced travel-related impacts are all evaluated separately below using the methods and standards outlined in the County's TSG (County of San Diego 2020) and the Traffic Impact Study (Appendix G). As discussed below, the proposed project would result in significant impacts related to VMT; however, as demonstrated in Table 2.13-4 the proposed

project would reduce VMT/capita and the VMT/employment metrics in comparison to the current General Plan making travel in Alpine CPA more efficient.

Residential and Employment

Based on SANDAGs model results, the proposed project is anticipated to have an average VMT/Capita of 24.41 miles and an average VMT/Employee of 31.79 miles. Table 2.13-5 compares the average VMT efficiency metrics, noted above for the Alpine CPA, to the VMT thresholds. The proposed project is considered to have a significant transportation-related impact if the VMT/Capita or VMT/ Employee of the community is not 15% or more lower than the VMT average of the San Diego Region.

Table 2.13-5. Proposed Impacts of Residential and Employment Land Uses on the San Diego Region

Analysis	Average VMT	Project VMT/Capita	Threshold[1]	Significant Impact
Residential (VMT/Capita)				
Base Year Regional	17.30	24.41	14.71	Yes
Base Year Unincorporated	26.20	24.41	22.27	Yes
Build Out Regional	14.68	24.41	12.48	Yes
Horizon Year Unincorporated	23.31	24.41	19.81	Yes
Employee (VMT/Employee)				
Base Year Regional	25.40	31.79	21.59	Yes
Base Year Unincorporated	33.60	31.79	28.56	Yes
Build Out Regional	21.75	31.79	18.48	Yes
Horizon Year Unincorporated	30.51	31.79	25.93	Yes

[1] The threshold is 15% lower than the Regional average.
VMT = Vehicle Miles Traveled
Source: Appendix G

Based on the County's TSG, impacts for employment and residential land use are considered significant when they are compared against base year conditions. As shown in Table 2.13-5, the average VMT/Capita and VMT/Employee within the Alpine CPA were modeled to be above the regional and unincorporated VMT thresholds. The project's exceedance of the residential and employee base year VMT thresholds at the regional level is considered a significant impact.

Retail

The project proposes to provide commercial retail uses in Subareas 2, 4, 5, and 6. No commercial land uses are proposed in Subareas 1 and 3; and no changes to the current commercial land use designations are proposed in Subarea 7. Retail land uses are considered to have a significant VMT related impact if they are greater than 50,000 square feet and considered to be non-locally serving, resulting in a net increase in VMT of the community or surrounding area. To identify if the retail uses within the proposed project are anticipated to increase the total VMT in the community, the base year VMT for retail is compared to the retail VMT associated with the proposed project. The existing retail VMT for the base year is 29,697, and the modeled retail VMT for the proposed project is 328,012. The VMT associated with external

patrons coming into the community to access retail or other commercial uses is higher than the base year conditions, resulting in a potentially significant impact.

Induced Travel

This section identifies the potential impacts associated with induced travel under the proposed project. Induced travel-related impacts are generally associated with vehicular capacity improvements or other changes to the current Mobility Element network.

Mobility Element Roadway Classification Changes

The project proposes changes to the existing Mobility Element (ME) Network includes the deletion of the following roadways: West Willows Road (existing ME ID 12), and New Roads 14, 18, 23, and 24. In addition, the project would result in changes to the roadway capacity on several roadways and would add one new roadway: New Road 26. These proposed changes to the ME Network are reflected in Table 2.13-6 below, and Figures 1-12a and 1-12b.

As shown in Table 2.13-6, the proposed project would increase the capacity of the following roadways:

- South Grade Road, between Tavern Road and Via Viejas (ME ID 7);
- New Road 11, between Victoria Park Terrace and Tavern Road (ME ID 11);
- North/East Victoria Drive, between Victoria Park Terrace and South Grade Road (ME ID 16); and
- Viejas View Place, between Alpine Boulevard and South Grade Road (ME ID 22).

In addition to the proposed increase in roadway capacity for the four road segments listed above, the project proposes to add one new roadway to the existing ME Network: New Road 26. The new road would provide a secondary access to Palo Verde Estates, which currently only has one way in and one way out.

The proposed ME Network changes are anticipated to result in faster travel times, which could lead to land development further out on the corridor, leading to long-term incremental increase in trip lengths, resulting in increased VMT.

Federal, State, and Local Regulations and Existing Regulatory Processes

The General Plan includes several policies within the Land Use and Mobility Elements that require development to expand village development and effectively use the existing transportation network to maximize the use of alternative modes of travel. These include Policies LU-1.4, LU-5.1, LU-5.4, LU-9.8, M-1.1, M-1.2, M-9.1, M-9.2, M-9.3, and M-9.4.

The County's ATP provides guidelines, as well as goals, objectives and actions for implementation of the ATP, including a transportation system management to optimize the transportation network, and provides goals and policies specific to the transportation system management and TDMs. In addition, the County's TSG provides requirements for development projects to include TDM, and to provide the calculated VMT reduction related to each TDM measure.

The prior EIR identified mitigation measure Tra-1.1 through Tra-1.7 and Tra-2.1, which included the following:

- Coordination with SANDAG and adjacent cities during updates to the RTP to identify a transportation network that maximizes efficiency and enhances connectivity between different modes of transportation;

Table 2.13-6. Proposed Changes and Additions to Roadway Mobility Element Classifications

ME Identification	Roadway	From	To	Current ME		Proposed ME		Change in Capacity
				Class	Capacity	Class	Capacity	
1	Old Highway 80	Lakeside CPA Boundary	Chocolate Summit Drive	2.2B	19,000	2.2C	19,000	0
2	Chocolate Summit Drive/Broad Oaks Road	Old Highway 80	Chocolate Creek Road	2.2E	16,200	2.3B	9,000	7,200
3	Alpine Boulevard	Dunbar Lane	Arnold Way	4.1B	34,200	2.1C	19,000	15,200
3	Alpine Boulevard	Arnold Way	Tavern Road	2.1D	19,000	2.1C	19,000	0
3	Alpine Boulevard	Tavern Road	South Grade Road	2.2A	19,000	2.2B	19,000	0
3	Alpine Boulevard	South Grade Road	West Willows Road	2.1D	19,000	2.1C	19,000	0
4	Harbison Canyon Road	Arnold Way	Bridle Run	2.2A	19,000	2.1C	19,000	0
4	Harbison Canyon Road	Bridle Run	Crest/Dehesa CPA Boundary	2.2C	19,000	2.1C	19,000	0
5	Arnold Way	Alpine Boulevard	South Grade Road	2.2C	19,000	2.1C	19,000	0
5	Arnold Way	Tavern Road	Alpine Boulevard	2.2A	19,000	2.2C	19,000	0
7	South Grade Road	~~Via Viejas~~ Tavern Road	Via Viejas	2.2E	16,500	2.2C	19,000	+2,800
8	Tavern Road	~~Arnold Way~~ Victoria Park Terrace	Arnold Way	4.1A	37,000	2.2D	19,000	-18,000

ME Identification	Roadway	From	To	Current ME		Proposed ME		Change in Capacity
				Class	Capacity	Class	Capacity	
11	New Road 11	Victoria Park Terrace	Tavern Road	2.3A	9,000	2.2E	16,200	+7,200
~~8~~12	Tavern Road	New Road 11	Victoria Park Terrace	4.1A	37,000	2.1A	19,000	-18,000
13	Victoria Park Terrace	Tavern Road (at Tavern Lane)	West Victoria Drive	2.2A	19,000	2.1D	19,000	0
16	North/East Victoria Drive	Victoria Park Terrace	Otto Avenue	2.2F	9,700	2.2D	19,000	+9,300
16	North/East Victoria Drive	Otto Avenue	South Grade Road	2.2C	19,000	2.2D	19,000	0
17	Otto Avenue	East Victoria Road	~~West~~ Willows Road	2.2C	19,000	2.2E	16,200	-2,800
19	Willows Road	Viejas Casino Area	East Willows Road Interchange	4.2A	30,000	2.2E	16,200	-13,800
22	Viejas View Place	Alpine Boulevard	South Grade Road	Local Public Road	N/A	2.3C	8,000	+8,000
<u>26[1]</u>	<u>New Road 26</u>	<u>Alpine Boulevard</u>	<u>Via Dieguenos</u>	<u>N/A</u>	<u>N/A</u>	<u>2.3C</u>	<u>8,000</u>	<u>+8,000</u>

Source: Appendix G
Note: [1] ME ID 26 is a new road segment proposed to be added to the ME Network..
CPA = Community Plan Area
ME = Mobility Element
N/A = Not Applicable

- Coordination with Caltrans and adjacent jurisdictions during planning and design for improvement to the freeway and state highway network;
- Implementation of County Public Road Standards during review of new development project;
- Implementation of County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects;
- Implementation of the Congestion Management Strategies identified in the RTP and requirements for large projects to mitigate impacts to State highways and freeways;
- Utilization of development procedures to require large commercial and office development to use the TDM program;
- Implementation of the County's TIF Ordinance; and
- Coordination with other jurisdictions when development projects result in significant impacts on city roads.

Summary

As discussed above, both the employment and residential land uses within the proposed project are anticipated to have a significant impact. The retail VMT (not associated with employees and residents) within the community is anticipated to increase under the proposed project and would also have a significant impact. The proposed ME Network changes have the potential to induce travel through the proposed new roadway link and provision of additional capacity, therefore resulting in a significant impact. Implementation of the General Plan policies and existing regulations would reduce the proposed project's impacts, but not to a level below significant. This would be considered a **significant impact** (**Impact-TRA-2**).

2.13.3.3 Issue 3: Substantially Increase Hazards Due to a Design Feature

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance (Transportation and Traffic), the proposed project would have a significant impact if it would substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or introduce incompatible uses (e.g., farm equipment).

Impact Analysis

The prior EIR concluded that the 2011 General Plan had the potential to result in a significant impact on rural roadway safety. The discussion of impacts related to conflicts with applicable plans, ordinances, or policies dealing with rural road safety can be found in Section 2.15.3.3 of the 2011 General Plan EIR. Mitigation measures Tra-1.3, Tra-1.4, Tra-1.6. and Tra-3.1 were identified, which included implementation of County Public Road Standards during review of new development project, implementation of County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects, development of project review procedures to require large commercial and office development to use Transportation Demand Programs, and coordination with SANDAG to obtain funding for operational improvements to State highways and freeways. In addition, the prior EIR identified General Plan policies LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5, and M-9.1 to help reduce

impacts associated with rural road safety; however, impacts remained significant and unavoidable.The proposed project would introduce higher density residential uses within Subareas 2, 4, and 6. Increased traffic generated by the new higher density residential uses has the potential to be incompatible with rural users of the roadways by creating safety hazards related to increased congestion and faster moving vehicles encountering slower moving vehicles, such as farm equipment. The project proposes to implement ME Policy M-8: Design of roads in industrial areas so industrial traffic will not use nearby residential streets for access or circulation. This policy is intended to protect health and safety of residents, including reduction of conflicts with truck traffic, noise, etc., along residential roadways. In addition, the project proposes changes to the ME Network roadway segments to decrease capacity along Chocolate Summit Drive and Tavern Road; increase the capacity along New Road 11, North/East Victoria Drive and Viejas View Place; and add one additional new roadway, new Road 26. However, the increase in traffic on rural roads within the Alpine CPA would remain a potentially significant impact in the residential areas. In addition, the increased density could also pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns. Therefore, impacts related to increased hazards due to incompatible uses would be potentially significant (**Impact-TRA-3**).

The proposed new roadway, New Road 26, from Alpine Boulevard to Via Dieguenos by Viejas Creek Trail is located within Subarea 5. The new roadway would be designed and constructed in accordance with the County of San Diego Department of Public Works (DPW) Road Standards (County of San Diego 2012), and per DPW's review procedures, new roadway plans would be reviewed by the County engineer. Design standards and design review requirements would ensure proposed roadways do not contain any hazardous features such as sharp curves or dangerous intersections. Therefore, impacts related to rural road safety from the design of a new roadway would be less than significant.

Federal, State, and Local Regulations and Existing Regulatory Processes

Several federal, State, and local regulations identified in Section 2.13.2, Regulatory Framework, are applicable to the proposed project and the potential to reduce hazards from design features or incompatible uses. The General Plan includes several policies within the Mobility and Land Use Elements that require development to design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. These include policies LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5, and M-9.1.

The prior EIR identified mitigation measure Tra-1.3, Tra-1.4, Tra-1.6 and Tra-3.1, which included implementation of County Public Road Standards during review of new development projects, implementation of County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects, development of project review procedures to require large commercial and office development to use Transportation Demand Programs, and coordination with SANDAG to obtain funding for operational improvements to State highways and freeways.

Summary

The proposed project would increase potential impacts related to higher density development within Subareas 2, 4 and 6; causing an increase in roadway hazards along rural roads due to incompatible uses compared to the prior EIR. Implementation of General Plan policies and prior EIR mitigation measure Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1 would reduce potential impacts but not below a level of significance and would be considered a **significant impact (Impact-TRA-3)**.

2.13.3.4 Issue 4: Result in Inadequate Emergency Access

Guidelines for the Determination of Significance

Based on Appendix G of CEQA and the County of San Diego Guidelines for Determining Significance (Transportation and Traffic), the proposed project would have a significant impact if it would result in inadequate emergency access.

Impact Analysis

The prior EIR determined that development would have the potential to result in direct and cumulative significant impacts on emergency access because existing roadway conditions within the rural areas of the unincorporated County could result in inadequate emergency response for the population anticipated under the 2011 General Plan, and that implementation of General Plan policies and mitigation measures were required. These policies and measures would reduce impacts related to emergency access because they require updating community plans to identify local public roads; implementing building and fire codes that ensure adequate service levels are in place; preparing fire protection plans to ensure the requirements of the County Fire Code and other applicable regulations are being met; and implementing and revising the Subdivision Ordinance to ensure that proposed subdivisions meet design and accessibility standards. Implementation of policies and mitigation measures would reduce impacts to less-than-significant levels.

The proposed project would increase development potential, and subsequently, population density in three of the seven subareas. The potential change in land uses that would be permitted under the proposed project, compared to the current General Plan, is provided in Chapter 1, Section 1.4, Project Description.

Inadequate emergency access and egress can occur as a result of an incomplete or not fully interconnected roadway network, such as inadequate roadway widths, turning radii, dead-end or gated roads, one-way roads, single ingress and egress routes, or other factors. In addition to Mobility Element roads, a comprehensive network includes regional freeways and highways and local public, private, and fire access roads. Private roads also have the potential to impair emergency access. Private roads are often unpaved and poorly maintained, which pose risks to public safety, especially in high wildfire hazard areas.

Dirt roads, or roads with potholes, may cause damage to fire apparatus vehicles and/or impede an emergency vehicle from accessing a site. Dirt roads pose additional safety concerns as dust can obstruct the view of evacuees during a firestorm, which can cause vehicles to drive off the road or into the fire. While the Alpine CPU does not propose private roads, development that includes private roads would be required to comply with the County's Standards for Private Roads, which establish minimum design and construction requirements, and include provisions related to emergency access.

Proposed New Road 26 would be constructed per the County's Road Standards (2012), which would ensure that roadways meet the design requirements to accommodate emergency access and vehicles.

Federal, State, and Local Regulations and Existing Regulatory Processes

The General Plan includes several policies within the Land Use, Mobility, and Safety Elements to improve emergency access throughout the Alpine CPA. These include Policies LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.4, S-3.5, and S-14.1. These policies would reduce impacts related to emergency access because they require updating community plans to identify local public roads, implementing fire and building codes to ensure adequate service levels are in place associated with construction of structures and their accessibility, preparing fire protection plans to ensure the requirements of the County Fire Code are being met, and including a provision of adequate vehicular access by new development.

The prior EIR identified mitigation measure Tra-1.3, Tra-1.4, Tra-1.6, Tra-4.1, Tra-4.2, Tra-4.3, and Tra-4.4, which included the following:

- Implementation of County Public Road Standards during review of a new development project;
- Implementation of County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects;
- Development of project review procedures to require large commercial and office development to use Transportation Demand Programs;
- Updating community plans to identify local public road and community emergency evacuation routes;
- Implementation of Building and Fire Codes to ensure adequate service levels;
- Implementation of County Guidelines for Determining Significance for Wildland Fire and Fire Protection; and
- Implementation of the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

Summary

The proposed project would allow for a greater number of housing units within Subareas 2, 4, and 6 of the Alpine CPA and proposes changes to the Mobility Element roadways. This would result in additional traffic and mobility changes within the Alpine CPA that could result in inadequate emergency access. However, implementation of the General Plan policies and compliance with existing regulations would reduce the proposed project's impacts related to emergency access to a **less than significant level**.

2.13.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for traffic includes the entire Alpine CPA and communities adjacent to and surrounding the Alpine CPA, including Lakeside, Crest-Dehesa, Central Mountain (including the Descanso and Pine Valley Subregions), Jamul-Dulzura, and Mountain Empire. The following describes potentially significant cumulative traffic impacts in the Alpine CPA vicinity and the proposed project's contribution to potential cumulative traffic impacts.

2.13.4.1 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System; including Transit, Roadway, Bicycle, or Pedestrian Facilities

Similar to the programmatic nature of the Alpine CPU, cumulative projects would potentially conflict with existing alternative transportation plans, policies, or programs. Development projects, consistent with applicable general plans, would locate land uses that are dependent on alternative transportation in areas that were not planned for in existing public transportation plans, and programs, such as SANDAG RTP. Additionally, if cumulative projects in surrounding jurisdictions are not effectively communicated and planned with agencies managing alternative transportation in the region, conflicts could occur. Cumulative projects would be required as applicable to comply with existing federal, State, and local regulations, such as ADA, Highway Capacity Manual 2016, TDA funds, SANDAG's San Diego Forward: The Regional Plan, 2018 Regional Transportation Improvement Plan, and other community plans or

jurisdictional standards, such as a zoning ordinance. Also, as most cumulative projects would be required to comply with existing regulations, cumulative project impacts would be less than significant.

As discussed in Section 2.13.4.2 below, traffic generated by implementation of the Alpine CPU combined with growth in the region would exceed the residential, employee and retail regional VMT thresholds, and therefore, would not be consistent with the State or County-adopted VMT policies threshold. This would result in a significant cumulative impact. In addition, cumulative projects that do not implement multi-modal improvements would contribute to the proposed project impacts to multi-modal facilities and would create a cumulative impact on multi-modal facilities in the community. Therefore, the proposed project would result in a significant cumulative impact (**Impact-C-TRA-1**).

2.13.4.2 Issue 2: Exceed Thresholds for Vehicle Miles Traveled

The County's TSG notes that if a project is consistent with the RTP/Sustainable Communities Strategy (SCS), then the cumulative impacts shall be considered less than significant. Cumulative projects inconsistent with the current General Plan (requiring a GPA) would require a cumulative VMT analysis. A project would result in a significant project-generated VMT impact under cumulative conditions if the applicable cumulative project-generated VMT thresholds are exceeded. A project's cumulative VMT effect would be considered significant if the cumulative link-level boundary VMT (total VMT, VMT/Employee, or VMT/Capita) increases under proposed project conditions as compared to current General Plan conditions. Therefore, this analysis assumes that cumulative impacts would occur if the proposed project increases the regional VMT/Employee, VMT/Capita or total VMT generated within the region when compared to current General Plan conditions.

The current General Plan land use designations and network classifications for the Alpine CPA are assumed within the RTP/SCS. Since the project proposes changes to the current General Plan land uses and transportation network, the proposed project is not consistent with the RTP/SCS. Therefore, the cumulative VMT effects of the proposed project were modeled. Table 2.13-7 provides a comparison of the proposed project total VMT, average VMT/Capita, and average VMT/Employee compared against those under the current General Plan at the regional, unincorporated, and community levels.

As shown in Table 2.13-7, the total VMT for all three geographic areas are anticipated to increase; however, the VMT/Capita and VMT/Employee are anticipated to decrease with the proposed project at the unincorporated and community levels, and would remain similar to the current General Plan at the regional level. This indicates that while there will be more growth in vehicular travel within the Alpine CPA as a whole, the travel will be done more efficiently than what is projected under the current General Plan conditions. However, based on the County's TSG, an increase in any of the regional metrics is considered a cumulative impact to the RTP/SCS. Since the proposed project is anticipated to increase the regional VMT/Capita, regional VMT/Employee, and the regional total VMT, the project would cause a significant impact to the RTP/SCS, resulting in a significant contribution to a cumulative impact (**Impact-C-TRA-2**).

Table 2.13-7. Cumulative Impacts to the Regional and Alpine SCS

Metric	Current General Plan	Proposed Project	Difference	Percent of Change	Significant Impact[1]
Regional VMT/ Capita	14.67	14.68	0.01	0.07%	Yes[1]
Regional VMT/ Employee	21.72	21.75	0.03	0.14%	Yes[1]
Total Regional VMT	96,668,603	96,819,000	150,397	0.16%	Yes[1]
Unincorporated VMT/Capita	23.39	23.31	-0.08	-0.34%	No
Unincorporated VMT/Employee	30.76	30.51	-0.25	-0.81%	No
Total Unincorporated VMT	21,600,628	21,669,679	69,051	0.32%	Yes
Alpine VMT/Capita	25.62	24.41	-1.21	-4.71%	No
Alpine VMT/ Employee	33.97	31.79	-2.18	-6.41%	No
Total Alpine VMT	1,487,583	1,724,540	236,957	15.93%	Yes

Source: Appendix G
Notes:
[1] Cumulative impacts are determined when the project alternative increases the regional Vehicle Miles Traveled (VMT) efficient metrics, when compared to current General Plan conditions. Therefore, these are the metrics that determine significant cumulative impacts; the other metrics are provided for information purposes.

2.13.4.3 Issue 3: Substantially Increase Hazards Due to a Design Feature

Buildout of the General Plan land use designations and/or the specific Community Plans of the surrounding communities in the County would generate additional vehicular traffic in areas traditionally occupied by rural uses and have the potential to be incompatible with rural users of the roadways by creating safety hazards related to increased congestion and faster moving vehicles encountering slower moving vehicles, such as farm equipment. The Mobility Element of the General Plan has identified new roadways throughout the County, including in the communities adjacent to the Alpine CPA, which would increase optional routes for new residential uses as well rural users and would reduce potential conflicts due to incompatible uses of the roadways. In addition, one new roadway would be designed and constructed in accordance with DPW's Road Standards (San Diego County 2012) and, per DPW's review procedures, new roadway plans would be reviewed by the County engineer. Design standards and design review requirements would ensure proposed roadways do not contain any hazardous features such as sharp curves or dangerous intersections. Therefore, impacts related to rural road safety would be less than significant. Consequently, a cumulatively significant impact related to hazardous design features from new roadways would not result from implementation of the proposed project.].

The Alpine CPU would increase density and traffic within an existing rural area causing an increase in roadway hazards along rural roads due to incompatible uses compared to the prior EIR. Cumulative projects in surrounding jurisdictions would face potential transportation operational issues that typically occur in unincorporated areas of the County. Older roadways, in incorporated jurisdictions that surround the County, would not be adequate by existing roadway standards. Additionally, many unincorporated areas that surround the County, including areas within the Counties of Riverside and Imperial have rural roadway conditions typical to those in the unincorporated County.

Therefore, cumulative projects in these areas would face the same traffic operational concerns including increased traffic on rural roads with slow moving agricultural vehicles and increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns. While cumulative projects would not preclude improvements to roadways with potential hazards, there is no guarantee that these improvements would be constructed concurrently with the anticipated increase in vehicle trips on these roadways. Therefore, cumulative projects would result in a potentially significant cumulative impact to rural road safety. Additionally, the proposed project would contribute to a significant cumulative roadway safety impact (**Impact-C-TRA-3**).

2.13.4.4 Issue 4: Result in Inadequate Emergency Access

Cumulative projects in the cumulative study area would encounter similar emergency access impairment concerns as the Alpine CPA, such as incomplete or not fully interconnected roadway networks, including inadequate roadway widths, turning radii, dead-end or gated roads, one-way roads, single ingress and egress routes, or other factors. Existing conditions in adjacent communities could result in existing inadequate roadway widths, dead-end roads, one-way roads, unpaved private roads, and gated communities, all of which have the potential to impair emergency access. However, cumulative emergency access impacts would be limited to the immediate vicinity of the impact, such as multiple obstructions to emergency access along the same route to an emergency care facility hospital. In addition, most cumulative projects, such as those identified in the SANDAG RTP and applicable general plans, which propose the construction of new roadways, would be required to meet current State and applicable jurisdictional standards, in addition to CEQA requirements. Similar to the Alpine CPU, other community plans in the County would also be required to consider local public and fire access roads to fully address emergency access requirements. Furthermore, the project proposes to add one new roadway to the existing ME Network (New Road 26). New Road 26 would provide a secondary access to Palo Verde Estates, which would improve access to this community that currently only has one access point. Therefore, a cumulatively significant impact related to emergency access would not result from implementation of the proposed project.

Impacts related to emergency access resulting from implementation of the Alpine CPA would be less than significant, and, as discussed above, a cumulative impact related to emergency access would not result from implementation of the proposed project. Therefore, the proposed project's contribution to cumulative impacts related to emergency access would not be cumulatively considerable.

2.13.5 Significance of Impacts Prior to Mitigation

The proposed project and cumulative effects of the proposed project in conjunction with subsequent projects within the Alpine CPA would result in potentially significant direct and cumulative transportation and traffic impacts.

Impact-TRA-1: **Conflict with existing circulation system policies.** The proposed project would exceed residential, employee and retail regional VMT thresholds, and therefore would conflict with the State and

County-adopted VMT policies. In addition, the increased density generated by the proposed project would increase the pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety.

Impact-TRA-2: **Exceed VMT Thresholds.** The proposed project's VMT would exceed the residential, employee, and retail regional VMT thresholds for the San Diego region.

Impact-TRA-3: Substantially increase hazards due to a design feature. The proposed project would increase hazards due to incompatible uses.

Impact-C-TRA-1: **Conflict with existing circulation system policies.** The proposed project would result in cumulative impacts in regard to exceeding cumulative VMT thresholds and being inconsistent with State and County-adopted VMT policies. In addition, the increased density generated by the proposed project would contribute to a cumulative impact to pedestrian and bicycle activity without the presence of adequate facilities, which may adversely affect pedestrian and bicycle safety.

Impact-C-TRA-2: **Exceed VMT Thresholds.** The proposed projects cumulative VMT would exceed the San Diego region thresholds.

Impact-C-TRA-3: **Conflict with existing circulation system policies.** The proposed project would contribute to a significant cumulative roadway safety impact.

2.13.6 Mitigation

2.13.6.1 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System; including Transit, Roadway, Bicycle, or Pedestrian Facilities

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. Future discretionary projects would be required to comply with the County's existing plans, standards and regulations to avoid conflicts with the programs, plans, and policies addressing the circulations system including multi-modal facilities. The County is currently in the process of developing a TDM ordinance; if this ordinance is fully developed and approved it would further assist future development projects to mitigate VMT and circulation impacts. However, as this ordinance is being developed through a separate process and not fully developed or approved at this time, it is not applied as mitigation for the proposed project. Even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

2011 General Plan Mitigation Measures

The following prior EIR mitigation measures are being carried forward and shall apply to the proposed project: Tra-1.1 and Tra-1.7, and Tra-2.1 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's conflicts with existing policies addressing the circulation system to the extent feasible.

Alpine CPU Mitigation Measures

MM-TRA-1: As part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed project to determine if subsequent projects would be required to implement TDMs, in accordance with the County's TSG.

2.13.6.2 Issue 2: Exceed Thresholds for Vehicle Miles Traveled

As discretionary projects are submitted, CEQA review would be completed which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the County is in the process of evaluating a County-wide VMT mitigation fee program, that if adopted, would apply to new development implemented under the Alpine CPA. If adopted, the fees collected from the program would go towards the development of multi-modal facilities or other VMT reducing infrastructure. As noted above in 2.13.6.1, the County is also in the process of developing a TDM ordinance; if this ordinance is fully developed and approved it would further assist future development projects to mitigate VMT impacts. As this ordinance is not fully developed or approved at this time, it is not applied as mitigation for the proposed project. Furthermore, implementation of the following prior EIR mitigation measures, in combination with the General Plan policies presented in Section 2.13.3.2 would reduce **Impact-TRA-2** and **Impact-C-TRA-2** to the extent feasible, but would not mitigate impacts from the exceedance of the VMT threshold to a less than significance level. Even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

Table 2.13-8 below provides a summary of the mitigation strategies evaluated, and the feasibility of implementing the strategies.

Table 2.13-8. Summary of Mitigation Strategies

Mitigation Strategy	Potential to Reduce Impacts	Feasibility
Transportation Demand Management	Potential to reduce Vehicle Miles Traveled (VMT) by up to 15% in suburban portions of community.	The County can require new development within the Alpine Community Planning Area (Alpine CPA) to implement a transportation demand management (TDM) Plan. However, this would only provide partial mitigation. Few empirical studies are available to suggest appropriate VMT reduction caps for strategies implemented in rural areas, and project-specific VMT reduction estimates should be calculated. Further, as noted by California Air Pollution Control Officers Association (CAPCOA), within rural areas, project-specific TDM measures would need to be identified. Since the Alpine Community Plan (Alpine CPU) is a programmatic document and does not provide project-specific details, specific TDM measures may be challenging when applied at this level. Additionally, CAPCOA recommends that a maximum VMT reduction cap of 15% be applied within suburban areas (no cap is provided for rural areas). This is far below the 30% to 91% in reductions that would be required to mitigate the direct impacts within Alpine CPA. For these reasons, utilizing TDM measures to reduce VMT at the community level for the Alpine CPA is not a viable mitigation measure; however, requiring

Mitigation Strategy	Potential to Reduce Impacts	Feasibility
		new project developments to develop a TDM plan could result in partial mitigation.
Active Transportation Improvements	Potential to reduce VMT by 1% to 3%	The County can implement the proposed active transportation facilities included in the San Diego County Active Transportation Plan (ATP). However, this will only have a minor effect within the Community as these measures are found to have limited effect in a rural context, and would only provide partial mitigation. Furthermore, as noted by CAPCOA, these strategies have a negligible impact in a rural context, such as the Alpine CPA (CAPCOA 2010)
Transit Route Extensions or Improvements	Can reduce VMT by up to 24.6%	Not a feasible mitigation measure since the County does not operate or control the region's transit services.
VMT Mitigation Fee Program	Potential to reduce impacts to less than significant at the regional level.	A VMT Mitigation Fee program does not currently exist at either the County or regional level. It is not known whether a program will be adopted, or if adopted, whether the fee program would reduce all impacts to less than significant in the Alpine CPA.
TDM Ordinance	Potential to reduce impacts to less than significant at the regional level.	A TDM ordinance does not currently exist. It is not known whether a TDM ordinance, once developed, would be adopted, and whether it would reduce all impacts to less than significant in the Alpine CPA.

Source: Appendix G

Infeasible Mitigation Measures

The following measures were considered to reduce impacts associated with exceeding the threshold for VMT. However, the County has determined that these measures would be infeasible and, therefore, these mitigation measures would not be implemented:

Transit Route Extensions or Improvements

Currently, Alpine is served only by MTS Bus Route 838. This route currently operates under limited service with one-hour headways during weekdays and only provide service to the core areas of the community (along Alpine Boulevard and Willows Road). MTS Bus Route 888 also has a stop at the Alpine Creek Shopping Center and Viejas Casino, which only runs one-time a day in each direction (eastbound/westbound). Route 888 ultimately connects between El Cajon and Jacumba Hot Springs.

Based on *CAPCOA's Quantifying Greenhouse Gas Mitigation Measures,* the expansion or enhancement of transit services can be an effective measure in reducing VMT, up to 24.6% (LUT-5); however, all public transit within the San Diego Region is operated by either the NCTD or MTS. The County of San Diego does not have the authority to change or expand transit services within Alpine. Therefore, the expansion of

transit services within Alpine is not a feasible mitigation measure to reduce the Alpine CPU's impacts to less than significant.

2011 General Plan EIR Mitigation Measures

The following prior EIR mitigation measures are being carried forward and shall apply to the proposed project: Tra-1.1, Tra-1.3, Tra-1.4, Tra-1.6, and Tra-1.7, Tra-2.1, Tra-3.1 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's VMT to the extent feasible.

Alpine CPU Mitigation Measures

MM-TRA-2 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall require applicants to include a TDM plan and implementation strategy based on the quantifiable measures outlined in the CAPCOA Guidelines or other TDM Guidelines adopted by the County. These strategies may include, but are not limited to: vanpools, telecommute or alternative work schedules, and master planned communities (with design and land use diversity to encourage intra-community travel). Neighborhood Electric Vehicle networks may also be appropriate for larger scale developments. The project-specific VMT reduction estimates of the selected TDM plan and implementation strategy shall be calculated.

MM-TRA-3 As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County Planning & Development Services staff shall review proposed projects to determine if new development within Alpine shall be required to implement the following Active Transportation Improvements to reduce VMT levels:

- LUT-9 Improve Design of Development - Maximum VMT Reduction 21.3% and minimum reduction of 3%.

  Grouped categories that go along with LUT-9

  - SDT-5: Incorporate Bike Lane Street Design
  - SDT-6: Provide Bike Parking in Non-Residential Projects
  - SDT-7: Provide Bike Parking with Multi-Unit Residential Projects
  - SDT-9: Dedicate Land for Bike Trails
- SDT-1: Provide Pedestrian Network Improvements – Maximum VMT Reduction 2%
- SDT-2: Provide Traffic Calming Measures - Maximum VMT Reduction 1%

2.13.6.3 Issue 3: Substantially Increase Hazards Due to a Design Feature

Implementation of the following prior EIR mitigation measures, in combination with the General Plan policies presented in Section 2.13.3.3 would reduce **Impact-TRA-3** and **Impact-C-TRA-3** to the extent feasible, but would not mitigate impacts from the increased hazards due to incompatible uses to a less than significance level. Even with the implementation of policies and mitigation, impacts would remain **significant and unavoidable**.

Infeasible Mitigation Measures

The 2011 General Plan EIR identified an infeasible mitigation measure that is being carried forward to reduce impacts associated with incompatible uses generating increased road hazards. However, the County has determined that this measure would be infeasible; therefore, these mitigation measures would not be implemented:

- All transportation facilities within the unincorporated County shall be retrofitted to provide safe bicycle and pedestrian movement corridors. This measure would conflict with the proposed project's objective to minimize public costs of infrastructure and services and correlate their timing with development. Additionally, this measure would be considered infeasible due to related construction improvement costs and potential reduction of existing and future service level standards of the facilities. In addition, some of the transportation facilities in the unincorporated County are within the jurisdiction of another agency, such as Caltrans.

2011 General Plan EIR Mitigation Measures

The following prior EIR mitigation measures are being carried forward and shall apply to the proposed project: Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1 (see Appendix B). Implementation of these mitigation measures would reduce the proposed project's potential to create hazards from incompatible uses, but not to a level below significance.

Alpine CPU Mitigation Measures

No additional mitigation measures are proposed.

2.13.6.4 Issue 4: Result in Inadequate Emergency Access

The proposed project would not result in any new or more severe impacts on scenic resources and impacts are less than significant. Implementation of the following 2011 General Plan EIR mitigation measures would reduce the proposed project's impacts on scenic resources. Therefore, no new mitigation measures would be required.

2011 General Plan EIR Mitigation Measures

The following prior EIR mitigation measures are being carried forward and shall apply to the proposed project: Tra-1.3, Tra-1.4, Tra-1.6, Tra-4.1, Tra-4.2, Tra-4.3, Tra-4.4 (see Appendix B).

Alpine CPU Mitigation Measures

No additional mitigation measures are required.

2.13.7 Conclusion

2.13.7.1 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System; including Transit, Roadway, Bicycle, or Pedestrian Facilities

Implementation of the proposed project would increase development in the Alpine CPA. The proposed density increase would have the potential to increase all VMT (VMT/Capita, VMT/employee, retail VMT and total VMT) in excess of established regional thresholds. The project's exceedance with the regional VMT thresholds would result in a potentially significant impact. In addition, the proposed increased

density would increase pedestrian and bicycle activity without the presence of adequate facilities and may adversely affect pedestrian and bicycle safety. Therefore, the proposed project would result in a potentially significant impact due to increased density conflicting with policies addressing the circulation system. These impacts would be more severe than impacts identified in the prior EIR (**Impact-TRA-1**). In addition, the proposed project would result in a potentially significant cumulative impact (**Impact-C-TRA-1**). General Plan policies, prior EIR mitigation measures, and the proposed Alpine CPU mitigation measure MM-TRA-1 identified above would reduce direct and cumulative impacts by reducing the project's impacts to VMT and bicycle and pedestrian facilities, but not below a level of significance. Impacts would remain **significant and unavoidable**.

2.13.7.2 Issue 2: Exceed Thresholds for Vehicle Miles Traveled

Implementation of the proposed project would increase development in the Alpine CPA. The proposed density increase would increase all VMT in excess of established regional thresholds. Therefore, this would be considered a significant impact of the proposed project (**Impact-TRA-2**). Additionally, the proposed project would contribute to a potentially significant cumulative impact associated with the increase in VMT at the regional level (**Impact-C-TRA-2**). General Plan policies, prior EIR mitigation measures, and the proposed Alpine CPU mitigation measures MM-TRA-1, MM-TRA-2, and MM-TRA-3 would reduce the project's direct and cumulative VMT impacts, but not to below a level of significance. Impact would remain **significant and unavoidable**.

2.13.7.3 Issue 3: Substantially Increase Hazards Due to a Design

Implementation of the proposed project would increase development in the Alpine CPA, which could result in an increase in hazards associated with incompatible uses. Therefore, the proposed project would result in a potentially significant impact due to an increase in hazards from incompatible uses, which would be more severe than impacts identified in the prior EIR (**Impact-TRA-3**). In addition, the proposed project would result in a potentially significant cumulative impact (**Impact-C-TRA-3**). General Plan policies and prior EIR mitigation measures identified above would reduce direct and cumulative impacts on hazards due to incompatible uses, but not below a LOS. Impacts would remain **significant and unavoidable.** Additionally, the proposed project's contribution to cumulative impacts associated with increased hazards due to design would **be cumulatively considerable.**

2.13.7.4 Issue 4: Result in Inadequate Emergency Access

Implementation of the proposed project would not result in any new or more severe impacts regarding emergency access. Implementation of the prior EIR mitigation measures (Appendix B) would reduce the proposed project's impacts on emergency access to **less than significant**. Therefore, no new mitigation measures would be required. In addition, the proposed project's contribution to cumulative impacts related to inadequate emergency access would be similar to those identified in the prior EIR and would **not be cumulatively considerable**.

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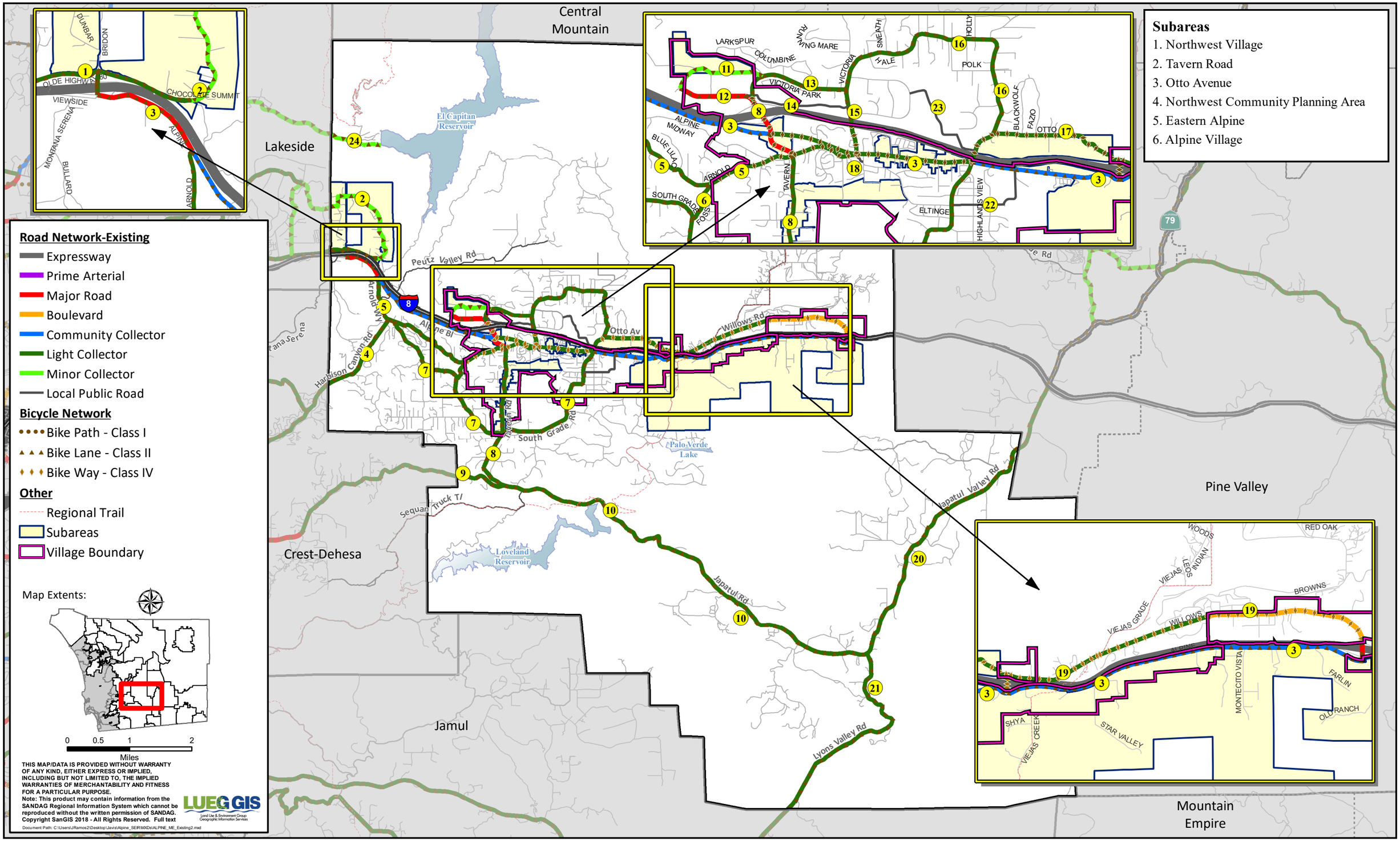
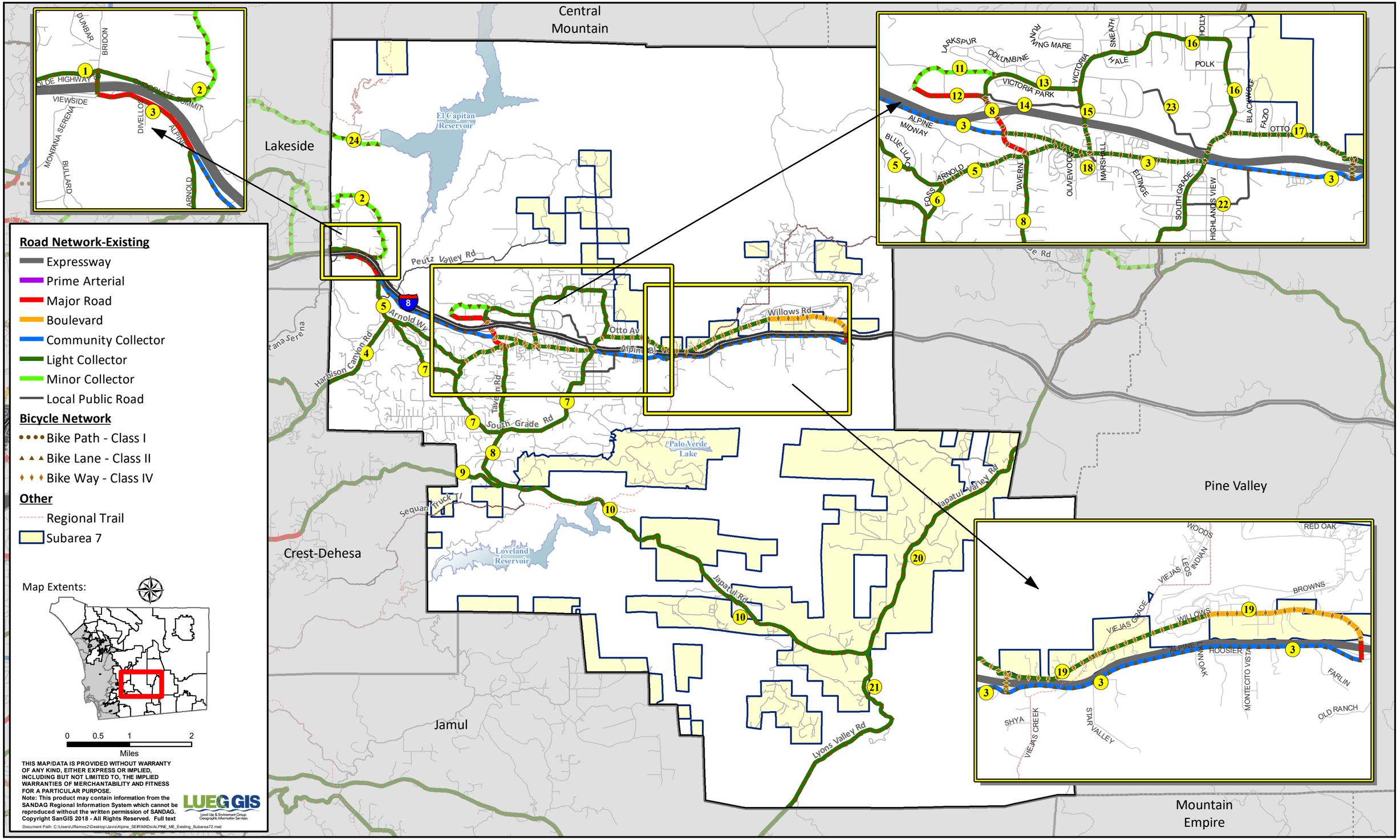


Source: SanGIS, County of San Diego, 2020

Figure 2.13-1a
Alpine CPU Existing Roadway Connections
Subareas 1-6



Source: SanGIS, County of San Diego, 2020

Figure 2.13-1b
Alpine CPU Existing Roadway Connections
Subarea 7

2.14 Utilities and Service Systems

This section describes the existing utilities and service systems serving the Alpine Community Plan Area (CPA) including the following: wastewater, potable water, stormwater, and solid waste systems, as well as the applicable regulations that govern their use, supply and distribution, and performance. In addition, this section analyzes the potential for the buildout of the proposed project to exceed the existing or planned infrastructure and treatment capacities for these utilities and service systems, requiring the construction of new or expanded facilities that could result in significant environmental effects.

This section incorporates information and analysis from the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative (FCI) General Plan Amendment (GPA) EIR (referred throughout the rest of this section as "prior EIRs") as they apply to the proposed project. Section 1.3, *Project Background*, of this Supplemental Environmental Impact Report (SEIR) provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA with the exception of the FCI lands, which were subsequently analyzed under the FCI EIR. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs; however, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

Table 2.14-1 summarizes the impact conclusions identified in this section.

Table 2.14-1. Utilities and Service Systems Summary of Impacts

Issue Number	Issue Area	Prior EIRs Conclusion	Project Direct Impact(s)	Project Cumulative Impact(s)	Level of Significance After Mitigation
UTIL-1	Expanded Utility Facilities	Less Than Significant	Potentially Significant	Potentially Significant	Significant and Unavoidable
UTIL-2	Adequate Water Supply	Significant and Unavoidable	Potentially Significant	Potentially Significant	Significant and Unavoidable
UTIL-3	Wastewater Treatment Capacity	Less Than Significant	Potentially Significant	Less Than Significant	Less Than Significant
UTIL-4	Landfill Capacity	Significant and Unavoidable	Less Than Significant	Less Than Significant	Less Than Significant
UTIL-5	Solid Waste Regulations	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant

Comments received during the Notice of Preparation (NOP) scoping process included concerns regarding future incompatible development and utility/water supply needs; lowering of the groundwater table from the installation of household wells; the need to bring water and sewage services to East Willows Road; effects of future development on downstream water supply sources such as Loveland Reservoir; and recommendations to discourage the use of septic systems and promote annexation to sanitation districts. These concerns are addressed and summarized in this section. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

Specifically, Issues in Section 2.14.3, below, analyze the project's potential to impact infrastructure and treatment capacities for utilities and service systems, and identify existing regulations and proposed policies and measures to reduce impacts to these resources.

2.14.1 Existing Conditions

This section discusses the existing utilities and service systems in the Alpine CPA. The utility providers serving the Alpine CPA are listed in Table 2.14-2. The utilities and service systems described in the prior EIRs are the same as the existing conditions evaluated in this SEIR. The discussion of existing conditions below only focuses on the utilities and service systems conditions that have experienced substantial changes since the adoption of the 2011 General Plan and FCI GPA.

Table 2.14-2. Utility Service Providers

Utility Service	Provider
Wastewater	San Diego County Sanitation District
Water	Padre Dam Municipal Water District; South Bay Irrigation District
Stormwater	County of San Diego
Solid Waste	County of San Diego Franchise Waste Hauler (Allied Waste)
Electricity and Natural Gas	San Diego Gas and Electric (SDG&E)

2.14.1.1 Wastewater Services

The Metro Wastewater Joint Powers Authority (JPA) is a State authorized JPA representing 12 agencies and approximately 800,000 people in the San Diego region. The Metro JPA is a coalition of the municipalities and special districts that share the use of the City of San Diego's wastewater facilities. Its member agencies include the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, and Poway; the Lemon Grove Sanitation District; the Padre Dam Municipal and Otay Water Districts; and the County of San Diego (on behalf of the Winter Gardens Sewer Maintenance District and the Alpine, Lakeside, and Spring Valley Sanitation Districts). The Metro JPA is a partner with the City of San Diego contributing one-third of the wastewater flows and $75,000,000 (fiscal year 2019) a year to the San Diego Metropolitan Wastewater System.

The Metropolitan Wastewater System, which is owned and operated by the City of San Diego's Public Utilities Department's (PUD) Wastewater Branch, provides regional wastewater treatment and disposal services for the San Diego region. The Metropolitan Wastewater System serves 16 cities and wastewater districts with a service area of approximately 450 square miles and service population of approximately 2.2 million (Metro JPA 2019).

Wastewater districts are generally responsible for providing collection, transmission, and disposal of sewage. Wastewater districts can be classified as dependent sanitation districts or independent sanitation districts. A dependent sanitation district is formed by resolution of the County of San Diego Board of Supervisors (BOS), while independent sanitation districts have their own independently elected Board of Directors. Unincorporated areas not serviced by wastewater districts typically utilize septic systems for wastewater disposal. The most common type of septic system found in San Diego County consists of a septic tank connected to leach lines.

The Alpine CPA is served by the San Diego County Sanitation District. This district serves a portion of the Alpine community, the remainder of which (approximately 98 percent) utilizes septic systems. Figures

2.14-1a and 1b show the service boundary for this sanitation district in relation to the Alpine CPA. The following describes the sanitation district that serve the Alpine CPA and subareas.

Alpine and Lakeside Sewer Service Areas – San Diego County Sanitation District

The Alpine Sewer Service Area (SSA), formerly the Alpine Sanitation District, and the Lakeside SSA, formerly the Lakeside Sanitation District, serve the communities of Alpine and Lakeside. Based upon a County BOS action in 2011, both SSAs were officially reorganized and annexed into the Spring Valley Sanitation District, which was then renamed the San Diego County Sanitation District. The District provides sewer service to approximately 36,000 customers in unincorporated areas of the County. The District sanitary sewer system is composed of approximately 432 miles of sewer lines, 8,200 manholes, eight pump stations, several pressurized force mains, and three wastewater treatment plants (DPW 2020). The Alpine and Lakeside SSAs convey all sewer flows into the City of San Diego Metropolitan Wastewater System. Within the subareas, the San Diego County Sanitation District serves all or a portion of Subareas 1, 2, and 6, and a portion of Subareas 4 and 7.

2.14.1.2 Potable Water Systems

Potable water in the Alpine CPA is provided by both water districts and groundwater. The central-western portion of the community is within the San Diego County Water Authority (SDCWA) service boundary, while the remainder of the community (approximately 81 percent) is entirely dependent on groundwater. Figures 2.14-2a and 2b show the water district boundary in relation to the Alpine CPA. The following sections describe each of these sources of potable water supply.

Water Districts

The Metropolitan Water District (MWD) supplies water to approximately 18 million people in a 5,200-square-mile service area that includes portions of Ventura, Los Angeles, Orange, San Bernardino, Riverside, and San Diego Counties. The MWD provides approximately 71 percent of the total water supply for the entire San Diego County and includes 12 member agencies. As one of the member agencies, the SDCWA is the largest in terms of water deliveries. The SDCWA is a wholesale water provider to 24 member agencies, some of which provide potable water service to the unincorporated County. Only the central-western portion of the Alpine CPA is within the SDCWA service boundary, as shown in Figures 2.14-2a and 2b.

Water service in the central-western portion of the Alpine CPA is provided by Padre Dam Municipal Water District and South Bay Irrigation District through agreements with the SDCWA. However, the South Bay Irrigation District does not provide service to any of the subareas; therefore, it is not discussed further in this section. While the SDCWA does not directly provide water service to the Alpine CPA, it is a wholesale water supplier to water districts that serve the community. The California Urban Water Management Planning Act (Water Code Part 2.6) requires each urban water supplier that provides water to 3,000 or more customers or provides over 3,000 acre-feet of water annually to prepare an Urban Water Management Plan (UWMP). The Urban Water Management Planning Act also requires urban water suppliers to update their UWMPs every 5 years. The water supply and demand projections are provided below for each of these water providers and a description of the changes between the 2010 and 2015 UWMPs is provided in Section 2.14.2, *Regulatory Setting*.

San Diego County Water Authority

The SDCWA's 2015 UWMP includes water use associated with accelerated forecasted growth in residential housing development, which was identified in San Diego Association of Governments' (SANDAG's) 2050 Regional Growth Forecast and was based on existing general plans of local jurisdictions. Table 2.14-3 shows the SDCWA's updated existing and projected water demand and estimated supply between 2020 and 2040 under normal and dry year weather conditions. The water supply values in Table 2.14-3 account for both SDCWA and member agency supplies, as well as projected supplies from the MWD necessary to meet the projected demand.

Table 2.14-3. Normal, Single-, and Multiple-Dry Year Water Supply and Demand[1] (2020–2040) (acre-feet per year)

	2020	2025	2030	2035	2040
Normal Year					
Supply	587,581	648,124	676,721	694,431	718,773
Demand	587,581	648,124	676,721	694,431	718,773
Difference	0	0	0	0	0
Single-Year Dry					
Supply[2]	666,684	694,147	725,006	720,083	718,863
Demand	629,198	694,147	725,006	743,990	770,765
Difference	+37,486	0	0	-23,907	-51,902
Multiple-Year Dry (First Year)					
Supply	525,710	718,652	722,741	728,330	749,030
Demand	491,000	640,932	699,895	728,330	749,030
Difference	+34,710	+77,720	+22,846	0	0
Multiple-Year Dry (Second Year)					
Supply	558,634	677,395	706,894	720,132	718,564
Demand	495,910	647,342	706,894	725,613	756,521
Difference	+62,724	+30,053	0	15,481	-37,957
Multiple-Year Dry (Third Year)					
Supply	586,587	653,815	684,649	683,539	682,327
Demand	500,869	653,815	713,963	742,969	764,086
Difference	+85,718	0	-29,314	-59,430	-81,759

Source: SDCWA 2016, Tables 9-1 and 9-7.

[1] The demand accounts for water efficiency savings.

[2] Includes total projected core supplies with utilization of carryover storage supplies.

As shown in Table 2.14-3, if the MWD, SDCWA, and member agency supplies are maintained, and water conservation measures are implemented, no shortages are anticipated through 2040 in a normal year. However, the SDCWA would potentially experience water supply shortages in various single-year and multiple-year dry scenarios. In these instances, additional regional shortage management measures, consistent with the SDCWA's *Water Shortage Contingency Plan* (SDCWA 2017), would be taken to address the water supply shortages.

Padre Dam Municipal Water District

Padre Dam Municipal Water District, a member agency of the SDCWA, provides water service within the central-western portion of the Alpine CPA. Within the seven subareas, the Padre Dam Municipal Water District serves Subareas 1, 2, 3, 4, 6, and 7, as well as a portion of Subarea 5, as shown in Figures 2.14-2a and 2b. A majority of Subarea 5 is outside of the Padre Dam Municipal Water District service boundary. NOP comments identified the need to bring services to East Willows Road. Service to East Willows Road is not currently provided; however, future service could be provided if the area is annexed into the district.

For the 2015 UWMP Update, Padre Dam Municipal Water District collaborated with the SDCWA and SANDAG and notified the land use agencies within its service area and key stakeholders. Table 2.14-4 shows the Padre Dam Municipal Water District's updated existing and projected water demand and estimated supply between 2020 and 2040 under normal and dry year weather conditions.

Table 2.14-4. Normal, Single-, and Multiple-Dry Year Water Supply and Demand (2020–2040) (acre-feet per year)

	2020	2025	2030	2035	2040[1]
Normal Year					
Supply	12,535	16,049	16,230	16,461	16,816
Demand	12,535	16,049	16,230	16,461	16,816
Difference	0	0	0	0	0
Single-Year Dry					
Supply	13,257	16,164	16,230	16,461	16,032
Demand	12,535	16,049	16,230	16,461	16,816
Difference	+722	+115	0	0	-784
Multiple-Year Dry (First Year)					
Supply	13,976	16,947	16,651	16,461	--
Demand	12,535	16,049	16,230	16,461	--
Difference	+1,441	+898	+421	0	--
Multiple-Year Dry (Second Year)					
Supply	13,179	16,049	16,230	16,141	--
Demand	12,535	16,049	16,230	16,461	--
Difference	+644	0	0	-320	--
Multiple-Year Dry (Third Year)					
Supply	12,535	15,884	15,589	15,298	--
Demand	12,535	16,049	16,230	16,461	--
Difference	0	-165	-641	-1,163	--

Source: Padre Dam Municipal Water District 2016, Tables 7-2, 7-3, and 7-8.

[1] The Padre Dam Municipal Water District's UWMP does not contain multiple-year dry projections for 2040.

As shown in Table 2.14-4, future demand would be met by the supply in each 5-year increment through 2040 under normal year conditions. However, insufficient supplies would be available in 2040 under single-year dry conditions, 2035 under multiple-year dry (second year) conditions, and 2025 through 2035 under multiple-year dry (third year) conditions.

Groundwater-Dependent Users

The majority of the Alpine CPA (approximately 81 percent) is not within the SDCWA service boundary and is therefore entirely dependent on groundwater. Groundwater-dependent users (e.g., residences, commercial uses) are either served by on-site private wells or groundwater provided by a small water system such as a small water company or water district. Within the seven subareas, the majority of Subarea 5 (approximately 94 percent) is groundwater dependent. Future groundwater demand for certain discretionary projects are managed through the County's Groundwater Ordinance, which includes specific requirements such as residential density controls to reduce groundwater impacts (see Section 67.722 of the County's Code of Regulatory Ordinances [Code]). The County's Groundwater Ordinance does not apply to existing groundwater users unless one of the specified discretionary permits is required. A full list of the discretionary permits subject to the Groundwater Ordinance is provided in Section 67.711 of the County's Code, while a list of exempt uses and permits is provided in Section 67.750.

2.14.1.3 Stormwater Drainage Facilities

A stormwater conveyance system, as defined by the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance, means "private and public drainage facilities other than sanitary sewers within the unincorporated areas of the County of San Diego by which urban runoff may be conveyed to receiving waters, and includes, but is not limited to, roads, streets, constructed channels, aqueducts, storm drains, pipes, street gutters, inlets to storm drains or pipes, and catch basins." The stormwater conveyance system is designed to prevent flooding by transporting water away from developed areas.

2.14.1.4 Solid Waste Facilities

Until 1997, the solid waste management system in San Diego County was serviced by eight landfill facilities. In October 1997, the County sold its active landfills and other solid waste collection assets to a private company, Allied Waste Industries, Inc. Currently, there are seven active landfills in the San Diego region that serve residents, businesses, and military operations in both incorporated and unincorporated areas: Borrego, Miramar, Otay, Ramona, Sycamore, Las Pulgas, and San Onofre. Solid waste is disposed of at the landfill of the hauling contractor's choice. The San Onofre and Las Pulgas landfills are owned and operated by the US Marine Corps and are not available for public disposal, while Miramar Landfill is operated on land leased from the US Navy by the City of San Diego.

The Gregory Canyon Landfill in northern San Diego County was previously partially permitted, and this landfill would have provided a capacity of 600,000 to 1 million tons per year with an estimated life of approximately 30 years. However, the permit for the Gregory Canyon Landfill was rescinded in December 2016 (DPW 2017), and a portion of the land proposed for the landfill was sold in November 2017. As such, it is uncertain whether this landfill will be built, and it is therefore not considered in the analysis below.

Siting of a new solid waste disposal facility, or expansion of an existing solid waste facility, is often a controversial and lengthy process. All potential disposal facilities in the County must be included in a Countywide Siting Element Amendment to the San Diego County Integrated Waste Management Plan. However, discussion of proposed sites in the Siting Element is only one step in the review and approval process. In addition, each proposed facility in the County is considered through the local jurisdictional land use permitting processes. The Countywide Integrated Waste Management Plan Five-Year Review Report was most recently published in September 2017 and determined that the County has enough daily permitted disposal capacity until 2059, including the state-mandated 15-year period of 2017 to 2032. The

Five-Year Review Report concluded that an amendment to the Countywide Siting Element is not warranted.

2.14.1.5 Electricity and Natural Gas Distribution

The County of San Diego is served by SDG&E, which provides energy service to over 3.4 million customers (i.e., 1.4 million accounts) in the County and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because the higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating.

In 2016 (most recent year for which California Renewables Portfolio Standard data are available), more than 43 percent of the electricity SDG&E supplied was from renewable sources, compared to less than 1 percent in 2002 (CPUC 2018).

Community Choice Aggregation (CCA) is a program that permits cities, counties, and other authorized entities, called Community Choice Aggregators to purchase and/or generate electricity for residents and businesses located within the boundaries of their jurisdiction. In October 2019, the County BOS approved creating a CCA energy program but voted to wait and see what governing authority to adopt in order to implement it.

2.14.1.6 Telecommunications Services

Telecommunications services, including telephone and cellular phone services, cable television, and internet and broadband services in the Alpine CPA, are provided by several privately owned companies.

Telephone and Cellular Phone

Local phone service in the Alpine CPA is provided primarily by AT&T, which offers traditional landline (copper wire) service as well as digital telephone service. Digital telephone service is offered by a number of other providers including Cox, Time Warner, and a variety of smaller companies.

AT&T, Sprint Nextel Corporation, T-Mobile, and Verizon Wireless are some of the cellular telephone providers offering service in the San Diego region. Providers use a combination of underground lines and aboveground cellular towers to provide telephone service to the Alpine CPA. Cellular towers are distributed throughout the region.

Cable Television and Internet

Cable television and Internet services are offered by many of the same companies that provide cellular phone service in the area and can be provided via a number of different technologies, including mobile (cellular), wireless, wireless local area network, and broadband. Fiber optic cables and copper wires are generally co-located with other utility infrastructure, which is usually installed underground within new development in order to reduce visual and safety hazards.

Broadband refers to a high-speed internet connection that can transport multiple signals and traffic types. According to the Federal Communications Commission (2017), 100 percent of residents in the San Diego region currently have access to broadband via at least one provider.

2.14.2 Regulatory Framework

The prior EIRs included a discussion of regulatory framework related to utilities and system services. The regulations described in the prior EIRs are the same as those evaluated in this SEIR, with the exception of Assembly Bill (AB) 1826, AB 341, the Regional Facilities Master Plan, the San Diego Integrated Regional Water Management Plan, the SDCWA's UWMP, the Drought Management Plan and the Alpine and Lakeside Sewer Service Areas Sewer Master Plan. Summaries of these regulations are provided below, as well as a list of the applicable regulations described in the prior EIRs for reference.

Applicable federal regulations include:

- Safe Drinking Water Act
- Federal Water Pollution Control Act of 1972 (Clean Water Act).

Applicable state regulations include:

- California Drinking Water Standards
- California Water Code
  - Senate Bill (SB) 610
  - SB 221
- California Code of Regulations Energy Efficiency Standards (Title 24, Part 6)
- California Integrated Waste Management Act (AB 939)
- Porter-Cologne Water Quality Control Act
- Groundwater Management Act (AB 3030)
- Urban Water Management Planning Act (California Water Code Sections 10610–10656)
- Water Conservation Projects Act.

In addition to the above, the following state regulations were either not included in the prior EIRs or have been adopted or updated since their certification.

2.14.2.1 Assembly Bill 1826

In October of 2014, Governor Brown signed AB 1826 into law, requiring businesses to recycle their organic waste depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. However, multi-family dwellings are not required to have a food waste diversion program.

2.14.2.2 Assembly Bill 341

To further the goals of AB 939, statewide strategies to achieve a 75 percent solid waste reduction goal by 2020 were established with the adoption of AB 341 in May 2012, the main component of which implemented mandatory commercial recycling for certain businesses and public entities. AB 341 required that commercial enterprises that generate 4 cubic yards or more of solid waste weekly and multi-family dwellings of five units or more arrange for recycling services. According to the San Diego County Five-Year Review Report "Countywide solid waste disposal decreased by 13 percent between 2000 and 2010, and rose by 10 percent between 2010 and 2015" (County DPW 2017).

2.14.2.3 Cortese-Knox-Hertzberg Reorganization Act of 2000

The Cortese-Knox-Hertzberg Reorganization Act of 2000 (Government Code Sections 56000–57550) mandates Local Area Formation Commissions (LAFCOs) to encourage orderly development within their jurisdiction. The Act governs the boundaries of special districts and cities consistent with each agency's principal act. To promote greater efficiency in services for future planning purposes, the Act mandates LAFCOs to conduct Sphere of Influence (SOI) reviews once every 5 years, as necessary. SOIs are used as a planning tool for agencies to conduct service and facility planning for areas it intends to serve in the future. Prior to or in conjunction with SOI reviews, a Municipal Service Review (MSR) must be prepared pursuant to Gov. Code Section 56430. MSRs are conducted to assist in the SOI review process by providing information regarding the ability of agencies to provide public services. LAFCOs have an established process and format for the preparation of MSRs.

2.14.2.4 Sustainable Groundwater Management Act

As stated in Section 2.14.2.4, the Sustainable Groundwater Management Act, effective January 1, 2015, requires local public agencies in certain groundwater basins throughout the state to sustainably manage groundwater resources, and authorizes State Water Board intervention in areas where local agencies are unable or unwilling to do so. The long-term planning required by the act is designed to provide a buffer against drought and climate change and contribute to reliable water supplies regardless of weather patterns in the state. The Alpine CPA is located outside of a groundwater basin subject to the Sustainable Groundwater Management Act and is therefore not applicable to the proposed project.

Applicable local regulations include:

- County of San Diego Groundwater Ordinance, County Code Section 67.701 et seq.
- County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance, County Code Section 67.801 et seq.
- County of San Diego Uniform Sewer Ordinance
- County of San Diego Health and Sanitation Ordinance, County of San Diego Code of Regulatory Ordinances, Title 6, Division 8, Chapter 1, Sections 68.101–68.123
- County of San Diego Fee Ordinances
- County of San Diego BOS Policy F-16, Cleaning and Repair of Sewer Laterals
- County of San Diego BOS Policy I-25, Establishment of Assessment Districts to Provide for Public Improvements and Facilities for Sanitary Sewers
- County of San Diego BOS Policy I-36, Sewer Extensions and Connections in Areas Not Annexed to a Sanitation District
- County of San Diego BOS Policy I-48, Sewer Extensions in Areas Not Annexed to a Sanitation District
- County of San Diego BOS Policy I-51, Connection to Districts Interceptor Sewers
- County of San Diego BOS Policy I-78, Small Wastewater Treatment Facilities
- County of San Diego BOS Policy I-84, Project Facility Availability and Commitment for Public Sewer, Water, School, and Fire Services

- County of San Diego BOS Policy I-99, Expenditures and Use of Revenue for Replacement and Expansion of Liquid Waste Facilities
- County of San Diego BOS Policy I-107, Policy on Long-Term Availability of Sewer Services to Certain Portions of East County
- Non-Exclusive Solid Waste Management Agreement
- County of San Diego Integrated Waste Management Plan
- County of San Diego Department of Environmental Health.

In addition to the above, the following local regulations have been adopted or updated since certification of the prior EIRs.

2.14.2.5 San Diego County Water Authority Regional Water Facilities Master Plan

The Regional Water Facilities Master Plan evaluates the ability of the SDCWA to continue to meet its mission of a safe and reliable water supply to its member agencies by recommending additional regional facilities and improvements to existing facilities to cost-effectively meet SDCWA's mission through the planning horizon. The SDCWA 2013 Master Plan encompasses a region-wide planning effort incorporating three interrelated components: water demands, water supplies, and facilities. Facility planning begins with estimating future water demands, proceeds to the identification of water supplies and their reliability, and then defines facilities needed to treat and transport the supplies to the points of demand. This planning process is iterative in nature, and computer simulations are employed to model facility alternatives that supplement SDCWA's current water delivery and storage system. The updated Master Plan follows the same master planning principles as the 2002 Plan and defines SDCWA's overall capital improvement process and budget, while maintaining a reliable water supply infrastructure through 2035.

2.14.2.6 San Diego Integrated Regional Water Management Plan

Since the adoption of the General Plan, the County has updated the San Diego Integrated Regional Water Management Plan to comply with the California Department of Water Resources, 2012 Integrated Regional Water Management Plan Program Guidelines and make the San Diego region eligible for future rounds of grant funding. The plan provides a mechanism for (1) coordinating, refining and integrating existing planning efforts within a comprehensive, regional context; (2) identifying specific regional and watershed-based priorities for implementation projects; and (3) providing funding support for the plans, programs, projects, and priorities of existing agencies and stakeholders.

The 2013 Integrated Regional Water Management Plan includes information from planning documents, as well as information produced from planning studies, workshops, and workgroups that are being conducted to address region-specific issues. The plan allows regional stakeholders to revisit the plan's goals, objectives, and priorities. The goals are as follows:

- Improve the reliability and sustainability of regional water
- Protect and enhance water quality
- Protect and enhance our watersheds and natural resources

- Promote and support sustainable integrated water resource management in order to achieve the goals, the following eleven Integrated Regional Water Management Plan Objectives have been adopted:
    1. Encourage integrated solutions to water management issues and conflicts
    2. Maximize stakeholder and community involvement and stewardship
    3. Effectively obtain, manage, and assess water resources data and information
    4. Further the scientific and technical foundation of water management
    5. Develop and maintain a diverse mix of water resources
    6. Construct, operate, and maintain a reliable infrastructure system
    7. Enhance natural hydrologic processes to reduce the negative effects of hydromodification and flooding
    8. Effectively reduce sources of pollutants and environmental stressors
    9. Protect, restore, and maintain habitat and open space
    10. Optimize water-based recreational opportunities
    11. Effectively address climate change through greenhouse gas reduction, adaptation, or mitigation.

The 2013 plan allows the region to focus on updated priorities and issues, facilitate project integration, forge partnerships with a variety of stakeholders, and move the region forward in implementing high-priority projects.

2.14.2.7 San Diego County Water Authority Urban Water Management Plan

The 2015 UWMP (SDCWA 2016) represents the most current available water supply planning projections for the San Diego region, and places more emphasis on conservation, water recycling, and expansion of local supplies through methods such as water desalination. The 2015 UWMP includes the following new sections not previously included in the 2005 UWMP:

- The SDCWA's climate change mitigation and adaptation strategies
- Measures, programs, and policies to achieve per capita water use targets as required by Water Code Section 10608.36 at retail agency level by the SDCWA as a wholesale provider
- A discussion of the Integrated Regional Water Management Plan
- The SDCWA's Scenario Planning process to deal with future uncertainties in long-range water planning.

2.14.2.8 Water Shortage Contingency Plan

The Water Shortage Contingency Plan (WSCP), adopted by the SDCWA's Board in August 2017, is a comprehensive water shortage planning document that outlines the procedures that the SDCWA would take during shortages to minimize impacts on the region. The SDCWA's previous shortage planning document, the Water Shortage and Drought Response Plan, was effectively activated in 2014 and

deactivated in 2016. The current WSCP expands upon the Water Shortage and Drought Response Plan to provide a more comprehensive document and includes updated information, such as a modernized communication strategy. The WSCP incorporates elements not previously included in the Water Shortage and Drought Response Plan, including a new section on catastrophic water shortage planning, guidelines to manage carryover storage, and procedures to perform an annual water supply reliability analysis.

2.14.2.9 Alpine and Lakeside Sewer Service Areas Sewer Master Plan

The Sewer Master Plan was a 2011 update to the previously prepared Sewer Master Plan in 2002. The Sewer Master Plan addresses the Alpine and Lakeside SSAs. The Sewer Master Plan evaluates the system capacity and provides a general assessment of the condition of the existing sewer collection system, including its pump stations, in order to develop a comprehensive 10-year Capital Improvement Program).

2.14.2.10 County of San Diego General Plan Policies

The General Plan includes goals and policies applicable to utilities and service systems within the Land Use, Housing, and Conservation and Open Space elements.

Land Use Element

Goal LU-1 of the Land Use element is a land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories, and this is accomplished through policy LU-1.2, which prohibits leapfrog development inconsistent with the Community Development Model.

Goal LU-6 is for a development-environmental balance and is accomplished by policies LU-6.5 and LU-6.9, which ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, and require development to conform to the natural topography.

Goal LU-8 is in regard to aquifers and groundwater conservation and is accomplished through policies LU-8.1 and LU-8.2, which require land use densities in groundwater-dependent areas to be consistent with the long-term sustainability of groundwater supplies and require development to identify adequate groundwater resources in groundwater-dependent areas.

Goal LU-9 requires well-defined, well-planned, and well-developed community cores, and this is accomplished by policy LU-9.4, which prioritizes infrastructure improvements and the provision of public facilities.

Goal LU-12 is adequate and sustainable infrastructure, public facilities, and essential services that meet community needs, and is accomplished through policies LU-12.1 and LU-12.2, which require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees**,** and require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses.

Goal LU-13 is adequate water quality, supply and protection and is accomplished by policies LU-13.1 and LU-13.2, which coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high-quality sustainable water supply and require new development to identify adequate water resources.

Goal LU-14 is adequate wastewater facilities and is accomplished through policies LU-14.1 through LU-14.4, which coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and ensure consistency with the County's land use plans, require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands, and require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. In addition, the policies prohibit sewer facilities that would induce unplanned growth.

Goal LU-16 is appropriately sited waste management facilities, and is accomplished through policies LU-16.1 through LU-16.3, which site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan in a manner that minimizes environmental impacts, prevents groundwater degradation, and complies with applicable local land use policies, as well as avoid encroachment of incompatible land uses upon solid waste facilities and encourage the establishment of additional recycling and resource recovery facilities.

Housing Element

Housing element Goal H-1 is for a housing stock comprising a variety of housing and tenancy types at a range of prices, which meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics. This is accomplished, in relationship to utilities and service systems, through policy H-1.3, which maximizes housing in areas served by transportation networks, within proximity to job centers, and where public services and infrastructure are available.

Conservation and Open Space Element

Conservation and Open Space Element goal COS-4 is in regard to water management and is a balanced and regionally integrated water management approach to achieve the long-term viability of the County's water quality and supply. This is accomplished through policies COS-4.1 through COS-4.4, which maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces**,** require development to reduce the waste of potable water through use of efficient technologies and conservation efforts**,** require efficient irrigation systems, maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces, and require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources.

Goal COS-5 is for the protection and maintenance of water resources and is accomplished through policies COS-5.2 and COS-5.5, which require development to minimize the use of directly connected impervious surfaces and to retain stormwater runoff caused from the development footprint at or near the site of generation, and require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas; watersheds; and other local water sources.

Goal COS-14 is for sustainable land development and is accomplished through policy COS-14.7, which encourages development projects that use energy recovery, photovoltaic, and wind energy.

Goal COS-15 is for sustainable architecture and buildings and is accomplished through policies COS-15.1 through COS-15.5, which require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency;

promote and develop standards for the retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG; require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs; require new development to reduce the energy impacts from new buildings; and encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures.

Goal COS-17 applies to sustainable solid waste management and is accomplished through policies COS-17.1 through COS-17.8, which reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated; require recycling, reduction and reuse of construction and demolition debris; require landfills to use waste management and disposal techniques; encourage composting throughout the County; require that all new land development projects include space for recycling containers; improve the County's rate of recycling by expanding solid waste recycling programs; and continue programs to educate industry and the public regarding the need and methods for waste reduction, recycling, and reuse.

2.14.2.11 Alpine CPU Policies

The Alpine CPU includes a description of infrastructure and services in Section 2.6 of the Land Use element. The section describes utilities including water, wastewater, electricity, and gas; however, no goals and policies are applicable to utilities and service systems within the Alpine CPU.

2.14.3 Analysis of Project Effects and Determination as to Significance

The County's Guidelines for Determining Significance do not include significance thresholds or guidance for determining significance for impacts on utilities and service systems. Therefore, the impact analysis that follows relies on the thresholds provided in Appendix G of the State CEQA Guidelines. Based on guidance provided in Appendix G, the proposed project would result in a significant impact if it would:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- (a) Have insufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry and multiple dry years; or (b) substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits are granted).
- Result in a determination by the wastewater provider which serves or may serve the project area that it has inadequate capacity to service the project's projected demand in addition to the provider's existing commitments.
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- Not comply with federal, State and local management and reduction statutes and regulations related to solid waste.

2.14.3.1 Issue 1: Require New or Expanded Utility Facilities

Guidelines for the Determination of Significance Analysis

According to Appendix G of the CEQA Guidelines, the proposed project would have a significant impact if it would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Impact Analysis

The prior EIRs determined that future development would result in an increased need for water and wastewater treatment services and require the construction of new and expanded water and wastewater treatment facilities that could result in significant environmental effects. In addition, the prior EIRs determined that future development would increase the area of impermeable surfaces, thereby increasing the amount of stormwater runoff that could exceed the capacity of existing stormwater drainage systems and require the construction of new or expanded facilities that could result in significant environmental effects. However, it was determined that the 2011 General Plan and FCI GPA would not result in a cumulatively considerable impact on water or wastewater treatment facilities or stormwater drainage systems. The discussion of impacts related to these facilities from implementation of the General Plan and FCI GPA can be found in Sections 2.16 and 2.17, *Utilities and Service Systems*, of the prior EIRs and is incorporated by reference. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies.

The proposed project would re-designate the land use designations within four of seven subareas of the Alpine CPA. Subareas 2, 4, and 6 would result in an increase in density and potential housing units at buildout from what was anticipated in the prior EIRs. Under the proposed project, approximately 6,078 housing units could be developed at buildout within the seven subareas, which represents an increase of approximately 2,013 housing units from what could be developed under the current General Plan. To accommodate this additional development, the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities could be required. The following discusses the potential need for each of these facilities, and whether their relocation or construction could result in significant environmental effects.

Water Distribution Facilities

Future development associated with the proposed project would increase the demand for potable water from what was anticipated in the 2011 General Plan and FCI GPA. As discussed in Section 2.15.1.2, *Potable Water Systems,* the majority of the Alpine CPA (approximately 81 percent) is not within the SDCWA service boundary and is therefore entirely dependent on groundwater. Within the Alpine CPU area, the Padre Dam Municipal Water District, which purchases water from the SDCWA, serves Subareas 1, 2, 3, 4, 6, and 7, as well as a small portion of Subarea 5. Buildout of the proposed project would result in an additional 2,013 potential housing units within the Padre Dam Municipal Water District service boundary, which would require connections to existing water distribution lines. Subareas 2, 4, and 6 would experience an increase in density, while Subarea 5 would experience a decrease, and therefore would not impact groundwater dependency.

Federal, State, and Local Regulations and Existing Regulatory Processes

Because potable water is provided by public utility providers, and not the County, any necessary improvements would be outside of the County's authority. Any future water infrastructure projects needed to serve development associated with the proposed project would be subject to environmental review pursuant to CEQA under the responsibility of the applicable utility provider.

Summary

The proposed project would re-designated existing land uses throughout seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Activities associated with the relocation or construction of new or expanded water distribution facilities could result in significant environmental impacts on air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. The program-level impacts of expanded infrastructure are addressed in the relevant sections of this SEIR. Environmental review of utility infrastructure projects would be conducted by the utility providers and agencies directly responsible for the approval and construction of new or expanded facilities. Any mitigation measures needed to avoid or reduce significant environmental impacts associated with the construction or expansion of these facilities would be implemented by these utility providers and agencies.

Because the proposed project would allow for a greater number of housing units requiring water service connections compared to the current General Plan, potential significant impacts associated with the relocation or construction of new or expanded water distribution facilities would be more severe than those identified in the prior EIRs and would be **potentially significant** (**Impact-UTIL-1**).

Wastewater Facilities

Future development associated with the proposed project would increase the demand for wastewater treatment from what was anticipated in the prior EIRs. As described in Section 2.15.1.1, *Wastewater Services*, the Alpine CPA is served by the San Diego County Sanitation District. This District is composed of eight unincorporated communities including Alpine and Lakeside. Proposed project changes outside of the service boundaries, such as in portions of Subareas 4 and 7, for this sanitation district, would rely on septic systems for wastewater.

The proposed project would increase the number of potential dwelling units within the District service boundary (Subareas 2 and 6) from what was anticipated in the prior EIRs. This would further increase the demand for wastewater services from the district and would likely require connections from new development to existing wastewater pipes, as well as upsizing of existing wastewater conveyance pipes. In addition, any future development that would occur outside of the District boundaries, such as in Subareas 4 and 7, would rely on septic systems unless substantial infrastructure improvements are completed to provide service connections to these areas and increase the capacity of the sewer pumps that convey wastewater to the Metropolitan Wastewater System. The construction of any new septic systems to service future development would require the installation of septic tanks and leach lines.

Federal, State, and Local Regulations and Existing Regulatory Processes

Residential land uses with a density of SR-1 or higher would potentially necessitate a need for sewer service, with the area required for septic systems dependent on groundwater depths, soils, topography, and other landscape factors. As such, infrastructure improvements would be required to reach the full development potential in Subarea 4 allowed under the proposed project. To provide sewer service to this

subarea, annexation to the District would be required for any future connections to the district. Like water districts, annexation to any sanitation district would first be subject to the LAFCO annexation process. At this programmatic level of analysis, it is unknown whether future development within Subarea 4 would be annexed to the district.

Summary

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Activities associated with the relocation or construction of new or expanded wastewater facilities could result in significant environmental impacts on air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. The program-level impacts of expanded infrastructure are addressed in the relevant sections of this SEIR. Environmental review of utility infrastructure projects would be conducted by the utility providers and agencies directly responsible for the approval and construction of new or expanded facilities. Any mitigation measures needed to avoid or reduce significant environmental impacts associated with the construction or expansion of these facilities would be implemented by these utility providers and agencies.

Because the proposed project would allow for a greater number of housing units requiring wastewater services compared to the 2011 General Plan and FCI GPA, potential significant impacts associated with the relocation or construction of new or expanded wastewater facilities would be more severe than those identified in the prior EIRs and would be **potentially significant** (**Impact-UTIL-1**).

Stormwater Drainage Facilities

The Alpine CPA is generally rural in nature and does not contain large areas of impervious surfaces typically found in more urbanized communities. Future development associated with the proposed project would have the potential to alter existing drainages and hydrology or increase the amount of impermeable surfaces within the Alpine CPA, thereby increasing the volume or rate of stormwater runoff. Future development would be required to incorporate such design elements as storm drains, ditches, swales, or other means of conveying runoff. However, any runoff would be required to be treated prior to being discharged from the site in accordance with County WPO and Regional MS4 requirements. In addition, redevelopment of currently developed areas could require the relocation of existing storm drains.

Federal, State, and Local Regulations and Existing Regulatory Processes

Development projects in the County must comply with the County Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO) in order to receive project approval. The WPO is the County's implementing ordinance for the applicable stormwater regulations within the County, including the Regional MS4 Permit requirements. This regulation requires development projects to demonstrate that they have provided stormwater facilities sized appropriately to accommodate runoff flows. The WPO also contains discharge prohibitions and requirements that vary depending on the type of land use activity proposed and its location within the County.

Summary

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated

in the 2011 General Plan and FCI GPA. Activities associated with the relocation or construction of new or expanded stormwater drainage facilities could result in significant environmental impacts on air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. Environmental review of utility infrastructure projects would be conducted by the utility providers and agencies directly responsible for the approval and construction of new or expanded facilities. Any mitigation measures needed to avoid or reduce significant environmental impacts associated with the construction or expansion of these facilities would be implemented by these utility providers and agencies.

Because future development would be intensified compared to the current General Plan, thereby increasing the number of impervious surfaces, potential significant impacts associated with the relocation or construction of new or expanded stormwater drainage facilities would be more severe than those identified in the prior EIRs and would be **potentially significant** (**Impact-UTIL-1**).

Electricity and Natural Gas Distribution

The Alpine CPA is within the service boundary of SDG&E, which provides electricity and natural gas throughout San Diego County. The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA.

Federal, State, and Local Regulations and Existing Regulatory Processes

Future development associated with the proposed project would require connections to existing electrical and natural gas transmissions lines. It should be noted that, because electricity and natural gas services are provided by public utility providers, and not the County, any necessary improvements would be outside of the County's authority.

Summary

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Activities associated with the relocation or construction of new or expanded electricity and natural gas facilities could result in significant environmental impacts on air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. The program-level impacts of expanded infrastructure are addressed in the relevant sections of this SEIR. It should be noted that electricity and gas services are provided by various public and private utility providers/companies, and therefore are outside of the County's authority. As such, environmental review of utility infrastructure projects would be conducted by the utility providers and agencies directly responsible for the approval and construction of new or expanded facilities. Any mitigation measures needed to avoid or reduce significant environmental impacts associated with the construction or expansion of these facilities would be implemented by these utility providers and agencies.

Because the proposed project would allow for a greater number of housing units requiring electricity and natural gas service connections compared to the 2011 General Plan and FCI GPA, potential significant impacts associated with the relocation or construction of new or expanded electrical and natural gas transmission lines would be more severe than those identified in the prior EIRs and would be **potentially significant** (**Impact-UTIL-1**).

Telecommunications Facilities

The prior EIRs did not analyze potential impacts associated with telecommunication facilities. Telecommunication services are currently provided within the Alpine CPA by various private utility companies. The proposed project would increase density throughout three of seven subareas, resulting in an increase in population that would utilize local cellular towers.

Federal, State, and Local Regulations and Existing Regulatory Processes

Future development associated with the proposed project would require connections to existing communications infrastructure (i.e., telephone and internet). It should be noted that, because telecommunication services are provided by private utility companies, and not the County, any necessary improvements would be outside of the County's authority.

The General Plan includes several policies within its Land Use Element, Housing Element, and Conservation Element that would reduce the potential for proposed land uses and development associated with the proposed project to result in significant environmental effects associated with the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. These policies are presented in Section 2.14.2.10, above.

In addition, the prior EIRs identified several mitigation measures addressing impacts associated with new or expanded utilities that would be applicable to the proposed project.

Summary

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Activities associated with the relocation or construction of new or expanded telecommunication facilities could result in significant environmental impacts on air quality, biological resources, cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. The program-level impacts of expanded infrastructure are addressed in the relevant sections of this SEIR. It should be noted that telecommunications services are provided by various public and private utility providers/companies, and therefore are outside of the County's authority. As such, environmental review of utility infrastructure projects would be conducted by the utility providers and agencies directly responsible for the approval and construction of new or expanded facilities. Any mitigation measures needed to avoid or reduce significant environmental impacts associated with the construction or expansion of these facilities would be implemented by these utility providers and agencies. As discussed above, because the proposed project would allow for a greater number of housing units requiring utility service connections compared to the 2011 General Plan and FCI GPA, the proposed project would result in new or more severe impacts than those identified in the prior EIRs. The prior EIRs did not analyze potential impacts associated with telecommunication facilities, and potential impacts associated with the relocation or construction of new or expanded telecommunications facilities would be considered a new **potentially significant** impact of the proposed project (**Impact-UTIL-1**).

2.14.3.2 Issue 2: Lack of Adequate Water Supplies

Guidelines for the Determination of Significance Analysis

According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would:

- Have insufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry and multiple dry years; or
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits are granted).

Impact Analysis

The prior EIRs determined that implementation of the 2011 General Plan and FCI GPA could result in future development with inadequate water supplies, and the combined effect of the impacts related to obtaining additional water supplies, the uncertainties inherent in obtaining those supplies, and construction impacts related to extraction, processing, and/or conveyance of additional water supply leads would be potentially significant. In addition, the prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact on water supplies. Although implementation of General Plan policies and mitigation measures and compliance with applicable regulations would reduce the 2011 General Plan and FCI GPA's project-level and cumulative impacts to the extent feasible, impacts on water supplies were concluded to be significant and unavoidable.

Within the Alpine CPA, potable water is primarily obtained by importing water from water districts or pumping water from local groundwater basins. The central-western portion of the Alpine CPA is within the SDCWA service boundary, while the remainder of the Alpine CPA is groundwater dependent. Within the Alpine CPU area, Subareas 1, 2, 3, 4, 6, and 7 as well as a small portion of Subarea 5 are within the SDCWA service boundary. As shown in Figures 2.14-2a and 2b, a majority of Subarea 5 is outside of the Padre Dam Municipal Water District service boundary.

Although buildout of the proposed project would result in an additional 2,013 potential housing units within the Padre Dam Municipal Water District service boundary, all future development would be required to obtain will serve letters from the water district prior to getting approved. Additionally, future projects that meet the definition of a water demand project, as defined in State CEQA Guidelines Section 15155, would be required to obtain a water supply assessment from the governing body of a public water system (i.e., water district) that demonstrates available water supplies are available.

San Diego County Water Authority Member Agencies

Future development associated with the proposed project would increase the demand for potable water from what was anticipated in the 2011 General Plan and FCI GPA. In terms of accounting for the proposed project, water demand projections in the Padre Dam Municipal Water District's 2015 UWMP were based on SANDAG's Series 13 Forecast, which anticipates future growth through 2050 based on local jurisdictions' current general plans. The proposed project involves a comprehensive update to the current Alpine Community Plan and would re-designate land uses within four of seven subareas throughout the Alpine CPA. As such, the proposed project was not included in the growth assumptions of SANDAG's Series

13 Forecast. Consequently, the proposed project is not currently accounted for in Padre Dam Municipal Water District's water supply and demand projections in its 2015 UWMP for normal, single-year, or multiple-year dry scenarios. Table 2.14-3 identifies Padre Dam Municipal Water District's updated existing and projected water demand and estimated supply between 2020 and 2040 under normal and dry year weather conditions based on the Series 13 Forecast. As shown in Table 2.14-3, future demand would be met by the supply in each 5-year increment through 2040 under normal year conditions. However, insufficient supplies would be available in 2040 under single-year dry conditions, 2035 under multiple-year dry (second year) conditions, and 2025 through 2035 under multiple-year dry (third year) conditions.

Federal, State, and Local Regulations and Existing Regulatory Processes

Numerous federal, state, and local regulations exist to ensure adequate water supplies are available. These include the following: the California Water Code, which controls almost all considerations of water and its use; SB 610, which requires water supply assessments for large projects within cities and counties; SB 221, which requires proof of sufficient water supply for various projects; the Urban Water Management Planning Act, which requires that water suppliers ensure a reliable water supply; and the Water Conservation Projects Act, which encourages local agencies to implement potential water conservation and reclamation projects.

SB 610 mandates that a city or county request a water supply assessment from a public water purveyor for projects meeting the definition of a water demand project as enumerated in Water Code Section 10912. SB 610 requires that the water purveyor of the public water system prepare the water supply assessment for inclusion in CEQA documentation and the approval process for such projects. SB 221 requires affirmative written verification from the purveyor of the public water system that sufficient water supplies are planned to be available for certain residential subdivisions of property prior to approval of a tentative map. The County also requires that development projects proposing to use imported water provide availability and commitment letters demonstrating sufficient water resources and access to available water facilities. These regulatory requirements, in addition to those described above, would be imposed on all future development associated with the proposed project, as applicable.

Summary

Because shortages have been identified in Padre Dam Municipal Water District's 2015 UWMP, and buildout of the proposed project would further increase the demand for potable water from the district from what was anticipated in the 2011 General Plan and FCI GPA, impacts on water supplies would be more severe than those identified in the prior EIRs and would be **potentially significant** (**Impact-UTIL-2**).

Groundwater-Dependent Users

The majority of the subareas (i.e., Subareas 1, 2, 3, 4, 6, and 7) are entirely within the SDCWA service boundary. However, a majority of Subarea 5 (approximately 94 percent) is outside of the Padre Dam Municipal Water District service boundary and therefore is entirely dependent on groundwater. Groundwater-dependent users (e.g., residences, commercial uses) are either served by on-site private wells or groundwater provided by a small water system such as a small water company or water district. However, no groundwater-dependent water districts serve the Alpine CPA, which means that all development outside of the SDCWA boundary relies on on-site private wells for groundwater.

Under the proposed project, Subareas 2, 4, and 6 would experience an increase in density, while Subarea 5 would experience a decrease in density. As stated above, Subareas 2, 4, and 6 are entirely within the SDCWA service boundary, and therefore the proposed project would not result in depletion of groundwater supplies or necessitate the installation of new groundwater wells.

Federal, State, and Local Regulations and Existing Regulatory Processes

Numerous federal, state, and local regulations exist to ensure that adequate groundwater water supplies are available. These include the County of San Diego Groundwater Ordinance, County Code Section 67.701 et seq., and are identified in Section 2.14.2.4. In addition, the General Plan includes several policies within its Land Use Element and Conservation Element that would reduce the potential for proposed land uses and development associated with the proposed project to result in inadequate water supplies. These policies require land use densities to be consistent with the long-term sustainability of groundwater supplies, development to identify adequate groundwater resources, coordination of water infrastructure planning with land use planning, development to reduce the waste of potable water through use of efficient technologies, and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping. These policies are described in Section 2.14.2, above, and include policies LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4, COS-5.2, and COS-5.5. In addition, the prior EIRs identified several mitigation measures addressing impacts on water supplies that would be applicable to the proposed project, including USS-4.1 through USS-4.7.

Summary

The proposed project would not increase the number of potential dwelling units in groundwater-dependent areas of the Alpine CPA from what was anticipated in the 2011 General Plan and FCI GPA and would not increase development that could result in the depletion of groundwater supplies or necessitate the installation of new groundwater wells, which could result in environmental impacts. Impacts on groundwater supplies would be **less than significant**.

2.14.3.3 Issue 3: Lack of Adequate Wastewater Treatment Capacity

Guidelines for the Determination of Significance Analysis

According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would result in a determination by the wastewater provider that serves or may serve the project area that it has inadequate capacity to service the project's projected demand in addition to the provider's existing commitments.

Impact Analysis

The prior EIRs determined that future development would result in increased demand on existing sewer systems due to increased wastewater flows from residential, commercial, and industrial land uses, resulting in a significant impact on wastewater facilities. However, it was determined that the 2011 General Plan and FCI GPA would not result in a cumulatively considerable impact on wastewater facilities. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies.

The Alpine CPA is within the regulatory boundaries of the San Diego Regional Water Quality Control Board, which regulates wastewater discharge in the majority of the eastern, central, and western unincorporated County. The Alpine CPA is served by the Alpine and Lakeside Sanitation Districts; however, these districts only serve a small portion of the community.

Within the subareas, the San Diego County Sanitation District serves all or a portion of Subareas 1, 2, and 6, and a portion of Subareas 4 and 7. Proposed project changes outside of the service boundaries, such as in portions of Subareas 4 and 7, for this sanitation district would rely on septic systems for wastewater.

The proposed project would increase the number of potential dwelling units within the Sanitation District service boundary (Subareas 2 and 6) from what was anticipated in the 2011 General Plan and FCI GPA. The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Under the current General Plan, approximately 4,065 potential housing units could be developed within the seven subareas. Under the proposed project, approximately 6,078 housing units could be developed at buildout within the project area, which represents an increase of approximately 2,013 housing units.

Federal, State, and Local Regulations and Existing Regulatory Processes

The proposed project would increase the number of potential dwelling units within the Sanitation District service boundary from what was assumed in the 2011 General Plan and FCI GPA, further increasing the demand for wastewater services from the district. In addition, any future development that would occur outside of the Sanitation District boundaries, such as in Subarea 4, would rely on septic systems unless substantial infrastructure improvements are completed to provide service connections to these areas and increase the capacity of the sewer pumps that convey wastewater to the Metropolitan Wastewater System. However, as described in detail under Issue 1 above, annexation to the Sanitation District would be required prior to completing any future connections to the sanitation district. Annexation to the sanitation district would first be subject to the LAFCO annexation process. At this programmatic level of analysis, it is unknown whether future development within Subarea 4 would be annexed to the sanitation district.

Additionally, the General Plan includes several policies within its Land Use Element and Conservation Element that would reduce the potential for proposed land uses and development associated with the proposed project to exceed wastewater treatment capacity by requiring new infrastructure, facilities, and services prior to development, providing adequate disposal of wastewater concurrent with the development, and prohibiting the extension of sewer systems and services beyond either Village boundaries or extant Urban Limit Lines. These include Policies LU-4.3, LU-9.4, LU-12.1, LU-12.2, and LU-14.1 through LU-14.4, which are presented in Section 2.14.2.10 above. Furthermore, the prior EIRs identified several mitigation measures addressing impacts on wastewater treatment capacity that would be applicable to the proposed project, including USS-1.1 through USS-1.3.

Summary

Because the number of potential housing units would be greater under the proposed project, thereby increasing the amount of wastewater requiring treatment, potential impacts on wastewater treatment capacities would increase relative to those identified in the prior EIRs, and impacts would be significant. As such, the proposed project would cause a more severe significant impact on wastewater treatment capacities than those identified in the prior EIRs and impacts would be **potentially significant** (**Impact-UTIL-3**).

2.14.3.4 Issue 4: Lack of Sufficient Landfill Capacity

Guidelines for the Determination of Significance Analysis

According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Impact Analysis

The prior EIRs determined that development of future land uses as designated in the 2011 General Plan and FCI GPA would have the potential to be served by landfills with insufficient capacity to accommodate the future solid waste disposal needs if additional landfills are not constructed and existing landfills are not expanded, resulting in a significant impact. In addition, the prior EIRs concluded that the 2011 General Plan and FCI GPA would have the potential to result in a cumulative impact on solid waste facilities. Although implementation of General Plan policies and mitigation measures would reduce the 2011 General Plan and FCI GPA's project-level and cumulative impacts to the extent feasible, impacts on landfill capacity were concluded to be significant and unavoidable.

Buildout of the proposed project would generate an increase in the pounds per day of solid waste generated compared to the 2011 General Plan and FCI GPA. Despite the increase in solid waste generation, permitted capacity of the region's landfills is available through 2059 per the 2018 Integrated Waste Management Plan Five-Year Review Report, which is beyond the 30-year planning horizon for the proposed project.

Federal, State, and Local Regulations and Existing Regulatory Processes

Numerous federal, state, and local regulations exist to ensure adequate solid waste facilities are available. These include the Integrated Waste Management Act (AB 939) and AB 341, which regulate the management of solid waste within the state; Non-Exclusive Solid Waste Management Agreement, which regulates waste collection in a market driven business; and Integrated Waste Management Plan, which presents strategies to assist in the siting of solid waste disposal facilities.

The 2018 Integrated Waste Management Plan Five-Year Review Report (DPW 2017) determined that Countywide solid waste generation decreased by 13 percent between 2000 and 2010 but increased by 10 percent between 2010 and 2015. Countywide disposal was at its highest in 2005 at 4,037,762 tons and at its lowest in 2012 at 2,714,430 tons. As disposal decreased significantly from 2006 through 2010, so did Countywide per capita disposal rates. As disposal slowly rose in 2013 through 2015, per capita disposal rates rose as well. The purpose of the Five-Year Review Report is to plan for 15 years of Countywide landfill disposal capacity and to determine the feasibility of the region's planning documents. Using estimated remaining capacities provided by landfill operators, the current physical space available in the region's landfills is the equivalent of nearly 120,000,000 tons with the last landfill closure date projected in 2059. While permitted capacity is available through 2059, waste disposal is only projected through the state-mandated 15-year period of 2032. Based on the disposal projections in the Five-Year Review Report, as well as recycling requirements and program requirements, the County has sufficient landfill capacity to accommodate disposal for the next 15 years, and it was determined that no revisions to the Countywide Siting Element of the County's Integrated Waste Management Plan were required.

CalRecycle provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste created by residences or businesses over a specified amount of time.

Waste generation includes all materials discarded, regardless of whether they are later recycled or disposed in a landfill (CalRecycle 2019). The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, generally resulting in an increase in density compared to the current General Plan. The proposed project would allow for up to 6,078 housing units to be developed within the project area, which represents an increase of approximately 2,013 housing units from what could be developed under the current General Plan. This increase in potential housing units would generate solid waste that would need to be disposed of at regional landfills. Table 2.14-5 provides a comparison of the estimated solid waste generation between the current General Plan and the proposed project.

Table 2.14-5. Estimated Solid Waste Generation

Land Use Type	Unit	Waste Generation Rate (lbs/unit/day)	Current General Plan (lbs/day)	Alpine CPU (lbs/day)	Net Change (lbs/day)
Single-Family Residential	Dwelling Unit	10	16,670	20,460	3,790
Multi-Family Residential	Dwelling Unit	4	9,592	16,128	6,536
Commercial/Retail	Square Footage	0.046	458,898	502,469	43,571
Industrial	Square Footage	0.006	4,912	4,912	0
		Total	**490,072**	**543,969**	**53,897**

Source: CalRecycle 2019
lbs = pound

Furthermore, the General Plan includes several policies within its Land Use Element that would further reduce the potential for proposed land uses and development associated with the Alpine CPU to generate solid waste in excess of standards or capacity by requiring new infrastructure, facilities, and services prior to development; diversion of solid waste from landfills; siting new solid waste management facilities in a manner that minimizes environmental impacts; and encouraging composting. These include policies LU-12.1 and LU-12.2, which are described above in Section 2.14.3.3, as well as policies LU-16.1 through LU-16.3 and LU-17.1 through LU-17.8 presented in Section 2.14.2.10 above.

The determination from the 2018 Integrated Waste Management Plan Five-Year Report (County DPW 2017) would be considered new information that was not known at the time the prior EIRs were certified. In addition, future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations, including AB 341 and the County's Integrated Waste Management Plan.

Summary

Sufficient landfill capacity is available to serve the proposed project. In addition, future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations, including AB 341 and the County's Integrated Waste Management Plan. Accordingly, this impact would be less severe than the impact identified in the prior EIRs and would be **less than significant**.

2.14.3.5 Issue 5: Violate Solid Waste Regulations

Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if it would not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact Analysis

The prior EIRs determined that future development would result in less than significant impacts due to mandatory compliance with federal, state, and local regulations; compliance with existing County regulatory processes; and implementation of the General Plan goals and policies.

While buildout of the proposed project would increase solid waste generation from what was anticipated in the current General Plan, future development would be required to comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

Federal, State, and Local Regulations and Existing Regulatory Processes

As discussed above under Issue 4, numerous federal, state, and local regulations exist to ensure adequate solid waste facilities are available. These include the Integrated Waste Management Act (AB 939) and AB 341, which regulate the management of solid waste within the state; the Non-Exclusive Solid Waste Management Agreement, which regulates waste collection in a market driven business; and the Integrated Waste Management Plan, which presents strategies to assist in the siting of solid waste disposal facilities.

Summary

Compliance with the above regulations is mandatory; therefore, impacts would be similar to those in the prior EIRs, and **less than significant.**

2.14.4 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for utilities includes the communities surrounding the Alpine CPA, whose population is served by many individual utility providers with specific service areas. These include the adjacent CPAs of Lakeside, Crest-Dehesa, Central Mountain (including the Descanso and Pine Valley Subregions), Jamul-Dulzura, and Mountain Empire, as well as any tribal lands within the Alpine CPA and these communities.

2.14.4.1 Issue 1: Require New or Expanded Utility Facilities

Cumulative projected growth within the cumulative study area would result in an increase in development, increasing the demand for water, wastewater treatment, electricity and natural gas, and telecommunications services. An increase in the demand for these services has the potential to require or result in the construction of new facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. It should be noted that water, electricity and natural gas, and telecommunications services are provided by various public and private utility providers/companies (e.g., SDG&E, Verizon, Padre Dam Municipal Water District) and therefore are outside of the County's authority. In addition, any future community plan updates for the CPAs within the cumulative study that propose increases in density would have the potential to further increase the demand for utility services from what was anticipated in the 2011 General Plan and FCI GPA. The provision of utility infrastructure to meet this demand could cause significant environmental effects on air quality, biological resources,

cultural resources, energy, greenhouse gas emissions, hydrology and water quality, noise, and traffic. Furthermore, cumulative growth and development in tribal lands, which are outside of the County's jurisdiction, would also increase the demand for utility services within the cumulative study area.

This growth would also result in an increase in impervious surfaces from development that would increase stormwater runoff volumes. To effectively manage the increased runoff, the construction of new stormwater drainage facilities or the expansion of existing facilities would be required, the construction of which could result in significant environmental effects. Most future water, wastewater treatment, stormwater infrastructure, electricity and natural gas distribution, and telecommunications projects would be required to conduct environmental review pursuant to CEQA. To the extent feasible, significant environmental impacts would be mitigated to below a level of significance. However, any future water distribution, electricity and natural gas distribution, and/or telecommunications projects needed to serve cumulative growth and development would be implemented by the respective utility provider, and not the County. As such, environmental review for these projects would be conducted by the applicable utility provider, and mitigation of any significant environmental impacts would be under their responsibility. In addition, cumulative projects would be required to comply with the same regulations described under Issue 1 in Section 2.14.3.1 above, which would also reduce the potential for significant impacts to occur. However, because it cannot be guaranteed that impacts could be reduced below a level of significance, there is a potential that the relocation or construction of utilities to accommodate future growth and development within the cumulative study area could result in cumulatively significant impacts.

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Future development associated with the proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects, resulting in a more severe impact. Although implementation of the General Plan policies and prior EIRs mitigation measures would reduce this impact, it cannot be guaranteed that impacts would be reduced below a level of significance because the specific details of future utility infrastructure projects are not currently known, and the relocation or construction of new or expanded utilities is under the purview of utility providers and agencies, not the County. Therefore, the proposed project's contribution to cumulative impacts associated with new or expanded utilities would be more severe than the contribution identified in the prior EIRs and would be a **potentially significant cumulative impact** (**Impact-C-UTIL-1**).

2.14.4.2 Issue 2: Lack of Adequate Water Supplies

Cumulative projected growth within the cumulative study area would result in an increase in development that would increase the demand for potable water supplies. Similar to the proposed project, any future community plan updates for the CPAs within the cumulative study that propose increases in density would have the potential to further increase the demand for potable water from what was anticipated in the 2011 General Plan and FCI GPA. Furthermore, cumulative growth and development in tribal lands, which are outside of the County's jurisdiction, would also increase the demand for water supplies. Some of these tribal lands would draw groundwater from the same sources as other groundwater users in the Alpine CPA, which could further deplete groundwater supplies in the cumulative study area depending on the extent of the growth in the tribal lands.

Many water districts that would serve cumulative projected growth and development within the cumulative study area have prepared and adopted UWMPs and/or other planning documents including

supply and demand projections and procurement strategies to ensure a reliable water supply exists to meet the projected demand within the region. The water supply and demand projections in UWMPs are based on SANDAG's growth forecasts, which anticipate future growth based on the adopted land use plans of local jurisdictions. As a result, the UWMPs only account for the land use plans that have been adopted at the time of their preparation. While these plans account for projected growth to the extent feasible, it is difficult to ensure sufficient long-term water supplies are available due to climate change, drought, and other factors, as acknowledged in the UWMPs. In addition, any future community plan updates within the cumulative study area would not have been accounted for in the UWMP in place at the time. Therefore, cumulative projected growth and development would have the potential to increase the demand for potable water in the region in a manner that exceeds projected supplies. On an individual project basis, future cumulative projects that meet the definition of a water demand project, as defined in State CEQA Guidelines Section 15155, would be required to obtain a water supply assessment from the governing body of a public water system (i.e., water district) that demonstrates available water supplies are available. It should be noted, however, that this provision only applies to city and county governments and the projects within their jurisdictions. Therefore, tribal lands are excluded from this requirement. Although laws and regulations such as the California Water Code, SB 610, SB 221, Urban Water Management Planning Act, Water Conservation Projects Act, and County Groundwater Ordinance, are intended to reduce impacts on water supply, and cumulative impacts from future growth and development would be significant due to the uncertainty of long-term water supply availability.

The proposed project would increase density beyond what was anticipated in the 2011 General Plan and FCI GPA, resulting in additional growth and development. Because this growth would not have been accounted for in the current water supply and demand projections of Padre Dam Municipal Water District's 2015 UWMP, which identified shortages under certain long-term scenarios, the proposed project would further strain local water supplies. As such, the proposed project would result in a more severe impact on water supplies. Similar to cumulative projects, future projects associated with the proposed project that meet the definition of a water demand project, as defined in State CEQA Guidelines Section 15155, would be required to obtain a water supply assessment from Padre Dam Municipal Water District that demonstrates adequate water supplies are available. However, because Padre Dam Municipal Water District has potential to experience shortages under long-term scenarios, future development associated with the proposed project, when combined with cumulative growth and development within Padre Dam Municipal Water District's service boundary, could inhibit the agency's ability to meet water demand and further contribute to potential long-term water supply shortages. Therefore, the proposed project's contribution to this impact would be a **potentially significant cumulative impact** and would be considered a more severe cumulative impact of the proposed project (**Impact-C-UTIL-2**).

2.14.4.3 Issue 3: Lack of Adequate Wastewater Treatment Capacity

Cumulative projected growth and development within the cumulative study area would increase demand for wastewater facilities, potentially to the point that the wastewater provider has inadequate capacity to serve the projected demand. Therefore, cumulative projected growth and development within the cumulative study area would likely require new wastewater facilities, the construction of which could have significant environmental impacts. However, development of most new facilities would be subject to CEQA review and would be required to mitigate environmental impacts to below a level of significance, to the extent feasible. Additionally, multiple federal, state, and local regulations pertain to the construction and operation of wastewater facilities, such as the Federal Water Pollution Control Act, Porter-Cologne Water Quality Control Act, and Uniform Sewer Ordinance. Therefore, cumulative impacts from future growth and development would not be significant.

The Alpine CPA is served by the San Diego County Sanitation District; however, this district only serves a portion of the Alpine CPA. The Sanitation District serves all or a portion of Subareas 1, 2, and 6, and a portion of Subareas 4 and 7. The proposed project would increase the number of potential dwelling units within the Sanitation District service boundary from what was assumed in the 2011 General Plan and FCI GPA, further increasing the demand for wastewater services from the district. In addition, any future development occurring outside of the Sanitation District boundaries, such as in Subarea 4, would rely on septic systems unless substantial infrastructure improvements are completed. However, annexation to the Sanitation District would be required prior to completing any future connections to the sanitation district. Annexation to the sanitation district would first be subject to the LAFCO annexation process. At this programmatic level of analysis, it is unknown whether future development within Subarea 4 would be annexed to the sanitation district. As a result, the proposed project would cause a more severe significant impact on wastewater treatment capacities. However, for the reasons described above, implementation of the General Plan policies and prior EIRs mitigation measures would reduce this impact to **less than significant**. Therefore, the proposed project's contribution to cumulative impacts associated with wastewater treatment capacity would be similar to those identified in the prior EIRs and **would not be a potentially significant cumulative impact**.

2.14.4.4 Issue 4: Lack of Sufficient Landfill Capacity

Cumulative projected growth and development within the cumulative study area would increase solid waste disposal and management demands that would need to be accommodated by existing landfills in the region. The 2018 Integrated Waste Management Plan Five-Year Report (County DPW 2017) determined that the County has sufficient landfill capacity through 2059, and no revisions to the Countywide Siting Element were necessary. As such, the existing regional landfill facilities have the capacity to accommodate the solid waste disposal needs of future growth and development within the cumulative study area. Therefore, cumulative growth and development would have a less than significant cumulative impact on landfill capacity due to the existing remaining capacity of the active landfills.

The proposed project would allow up to 6,078 housing units to be developed within the subareas, which represents an increase of approximately 2,013 housing units from what could be developed under the current General Plan. This increase in potential housing units would generate solid waste that would need to be disposed of at regional landfills. However, as noted above, permitted capacity of the region's landfills is available through 2059, and recycling requirements and programs would also help reduce solid waste. In addition, future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations in regard to recycling and waste diversion. Therefore, this impact would be less severe than the impact identified in the prior EIRs and **would not be a potentially significant cumulative impact**.

2.14.4.5 Issue 5: Violate Solid Waste Regulations

Cumulative projected growth and development within the cumulative study would be required to comply with all applicable federal, state, and local statutes and regulations related to solid waste. Future development on tribal lands would be subject only to federal and tribal regulations, unless solid waste was transported off tribal lands, which would then be required to comply with state and local laws and regulations. Therefore, compliance with applicable regulations would ensure that cumulative projected growth and development within the cumulative study area would result in a less than significant cumulative impact.

While buildout of the proposed project would increase total solid waste generation from what was anticipated in the 2011 General Plan and FCI GPA, future development would be required to comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, because compliance with these regulations is mandatory, impacts would be similar to the prior EIRs and **would not be a potentially significant cumulative impact**.

2.14.5 Significance of Impacts Prior to Mitigation

The proposed project would result in potentially significant direct and cumulative impacts related to requiring new or expanded utility facilities and water supply resulting in environmental impacts. The proposed project would also result in a potentially significant direct impact related to lack of adequate wastewater treatment capacity.

Impact UTIL-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The proposed project would cause more severe potentially significant impacts related to expanded utility facilities compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact UTIL-2: Have insufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry and multiple dry years; or (b) substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The proposed project would cause more severe potentially significant impacts related to adequate water supplies compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact UTIL-3: Result in a determination by the wastewater provider which serves or may serve the project area that it has inadequate capacity to service the project's projected demand in addition to the provider's existing commitments. The proposed project would cause more severe potentially significant impacts related to wastewater treatment capacity compared to the 2011 General Plan and FCI GPA. This would be considered a significant impact.

Impact C-UTIL-1: Result in a Cumulatively Considerable Contribution Associated With the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The proposed project would cause more severe potentially significant impacts related to expanded utility facilities compared to the 2011 General Plan and FCI GPA. Therefore, the project's contribution to this impact would be cumulatively considerable.

Impact C-UTIL-2: Result in a Cumulatively Considerable Contribution Associated With insufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry and multiple dry years; or (b) substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The proposed project would cause more severe potentially significant impacts related to adequate water supplies compared to the 2011 General Plan and FCI GPA. Therefore, the project's contribution to this impact would be cumulatively considerable.

2.14.6 Mitigation

2.14.6.1 Issue 1: Require New or Expanded Utility Facilities

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs mitigation measures, in combination with the General Plan policies, would help reduce impacts **Impact-UTIL-1** and **Impact-C-UTIL-1**, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: USS-2.1 through USS-2.3, USS-3.1 through USS-3.5, and USS-8.1 through USS-8.3 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts.

Alpine Community Plan Update Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.14.6.2 Issue 2: Lack of Adequate Water Supplies

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs mitigation measures, in combination with the General Plan policies, would help reduce impacts **Impact-UTIL-2** and **Impact-C-UTIL-2**, but not below a level of significance. Therefore, these impacts would be **significant and unavoidable.** The proposed project would result in a potentially significant impact associated with inadequate water supplies. For the reasons described, and with implementation of the prior EIRs mitigation measures listed below, in combination with the General Plan policies, **Impact-UTIL-2** and **Impact-C-UTIL-2** would be reduced but not below a level of significance. Therefore, these impacts would be **significant and unavoidable**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: USS-4.1 through USS-4.7 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts.

Alpine Community Plan Update Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.14.6.3 Issue 3: Lack of Adequate Wastewater Treatment Capacity

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs mitigation measures, in combination with the General Plan policies, would reduce impact **Impact-UTIL-3** to **less than significant**.

2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: USS-1.1 through USS-1.3**,** (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts.

Alpine Community Plan Update Mitigation Measures

No additional mitigation measures have been identified specific to the Alpine CPA.

2.14.6.4 Issue 4: Lack of Sufficient Landfill Capacity

The proposed project would result in **less than significant** impacts to landfill capacity and therefore no mitigation is proposed.

2.14.6.5 Issue 5: Violate Solid Waste Regulations

The proposed project would result in **less than significant** impacts in regard to solid waste regulations and therefore no mitigation is proposed.

2.14.7 Conclusion

2.14.7.1 Issue 1: Require New or Expanded Utility Facilities

The proposed project would re-designate existing land uses within four of seven subareas in the Alpine CPA, resulting in an increase in density and potential housing units at buildout from what was anticipated in the 2011 General Plan and FCI GPA. Future development associated with the proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and/or telecommunications facilities that could cause significant environmental effects, resulting in a more severe significant impact (**Impact-UTIL-1**). In addition, the proposed project's contribution to cumulative impacts associated with new or expanded utilities would be more severe than the contribution identified in the prior EIRs and would be cumulatively considerable (**Impact-C-UTIL-1**). Implementation of the General Plan policies would reduce impacts, but not below a level of significance because the relocation or construction of new or expanded utilities would be under the purview of utility providers and/or agencies, and not the County. As a result, it cannot be guaranteed that impacts associated with the relocation or construction of new or expanded utilities would be reduced to less than significant. Therefore, after mitigation, **Impact-UTIL-1** and **Impact-C-UTIL-1** would be more severe than the impacts identified in the prior EIRs and would be **significant and unavoidable and cumulatively considerable**.

2.14.7.2 Issue 2: Lack of Adequate Water Supplies

The proposed project would increase density beyond what was anticipated in the 2011 General Plan and FCI GPA, resulting in an increase in density and potential housing units at buildout. Because this growth would not have been accounted for in the water supply and demand projections of Padre Dam Municipal Water District's 2015 UWMP, which identified shortages under certain long-term scenarios, the proposed project would further strain local water supplies. As such, the proposed project would result in a more severe significant impact on water supplies (**Impact-UTIL-2**). When combined with future growth and development, particularly that which occurs within Padre Dam Municipal Water District's service boundary, the proposed project's contribution to this impact would be cumulatively considerable and

would be considered a more severe significant cumulative impact of the proposed project (**Impact-C-UTIL-2**). Implementation of the General Plan policies and the prior EIRs mitigation measures would reduce the proposed project's impacts on water supplies, but not below a level of significance due to the uncertainty surrounding the availability of long-term water supplies to serve future development associated with the proposed project. Therefore, after mitigation, **Impact-UTIL-2** and **Impact-C-UTIL-2** would be more severe than the impacts identified in the prior EIRs and would be **significant and unavoidable and cumulatively considerable**.

2.14.7.3 Issue 3: Lack of Adequate Wastewater Treatment Capacity

The proposed project would increase the number of potential dwelling units within the San Diego County Sanitation District service boundary from what was assumed in the 2011 General Plan and FCI GPA, further increasing the demand for wastewater services from the district. In addition, any future development occurring outside of the Sanitation District boundaries, such as in Subarea 4, would rely on septic systems unless substantial infrastructure improvements are completed. However, annexation to the Sanitation District would be required prior to completing any future connections for Subarea 4 to the sanitation district. Annexation to the sanitation district would first be subject to the LAFCO annexation process. At this programmatic level of analysis, it is unknown whether future development within Subarea 4 would be annexed to the sanitation district. As a result, the proposed project would cause a more severe significant impact on wastewater treatment capacities (**Impact-UTIL-3**). However, for the reasons described above, implementation of the General Plan policies and the prior EIRs mitigation measures would reduce this impact to **less than significant**. In addition, the proposed project's contribution to cumulative impacts associated with wastewater treatment capacity would be similar to the contribution identified in the prior EIRs and **would not be cumulatively considerable**.

2.14.7.4 Issue 4: Lack of Sufficient Landfill Capacity

The proposed project would allow for an increase in potential housing units that would generate solid waste needing to be disposed of at regional landfills. However, permitted capacity of the region's landfills is available through 2059. In addition, future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations related to recycling and waste diversion. Therefore, this impact would be less severe than the impact identified in the prior EIRs and project impacts would be **less than significant**. Similarly, the proposed project's impacts on landfill capacity **would not be cumulatively considerable**.

2.14.7.5 Issue 5: Violate Solid Waste Regulations

The proposed project would allow for an increase in potential housing units that would generate solid waste needing to be disposed of at regional landfills. Future development associated with the proposed project would be required to demonstrate compliance with federal, state, and local regulations. Therefore, this impact would be less severe than the impact identified in prior EIRs. Project level impacts would be **less than significant**. Similarly, the proposed project's impacts on landfill capacity **would not be cumulatively considerable**.

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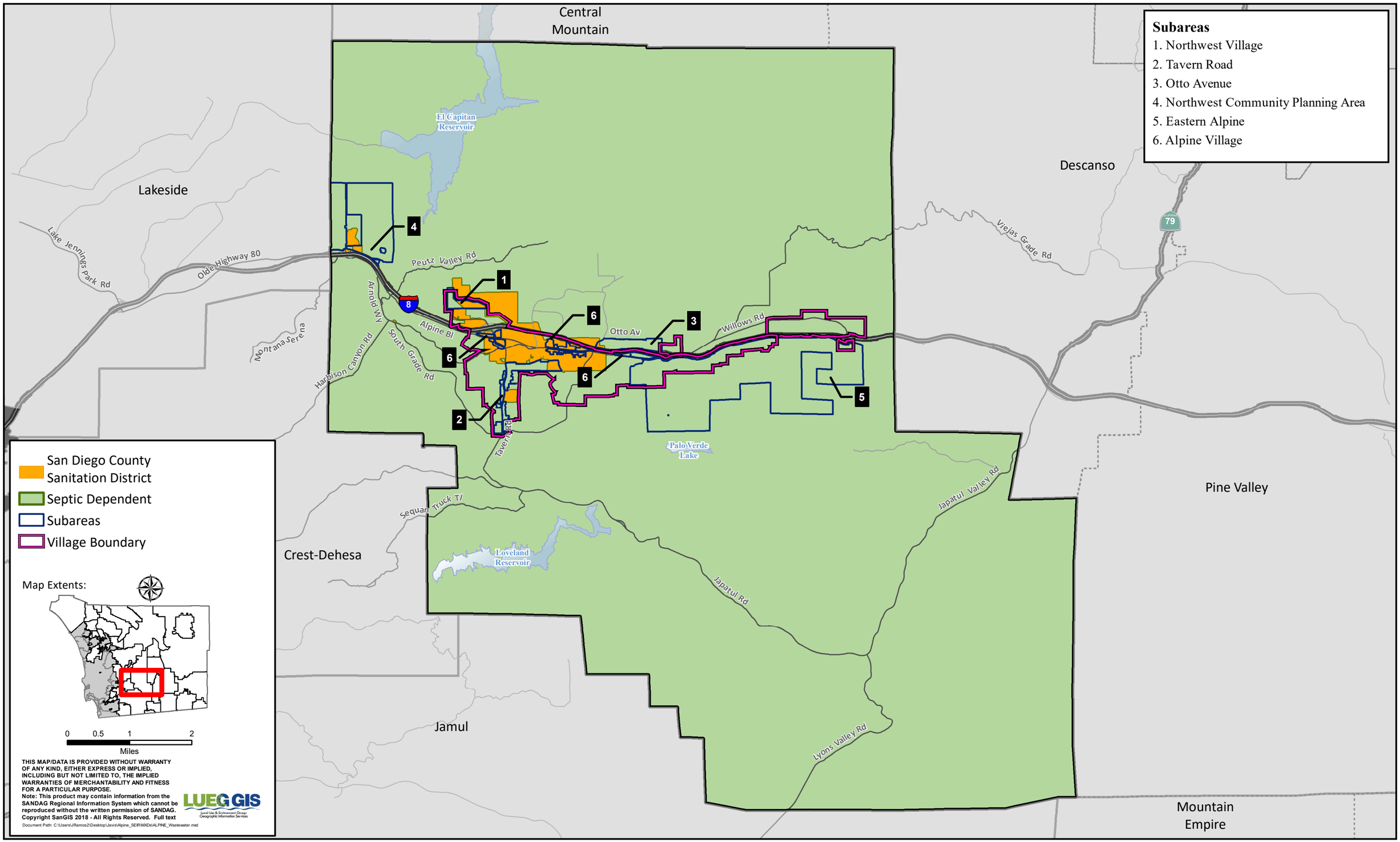
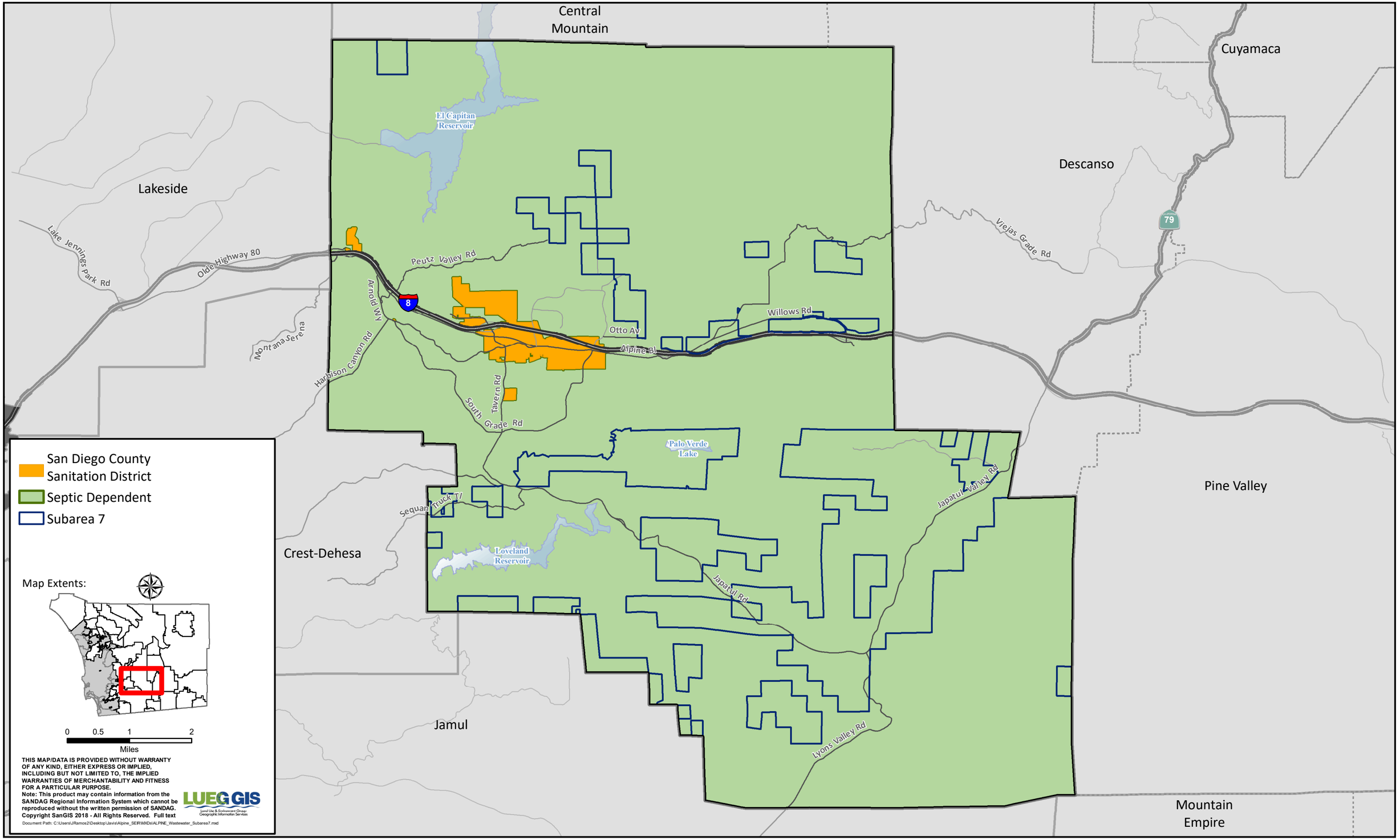


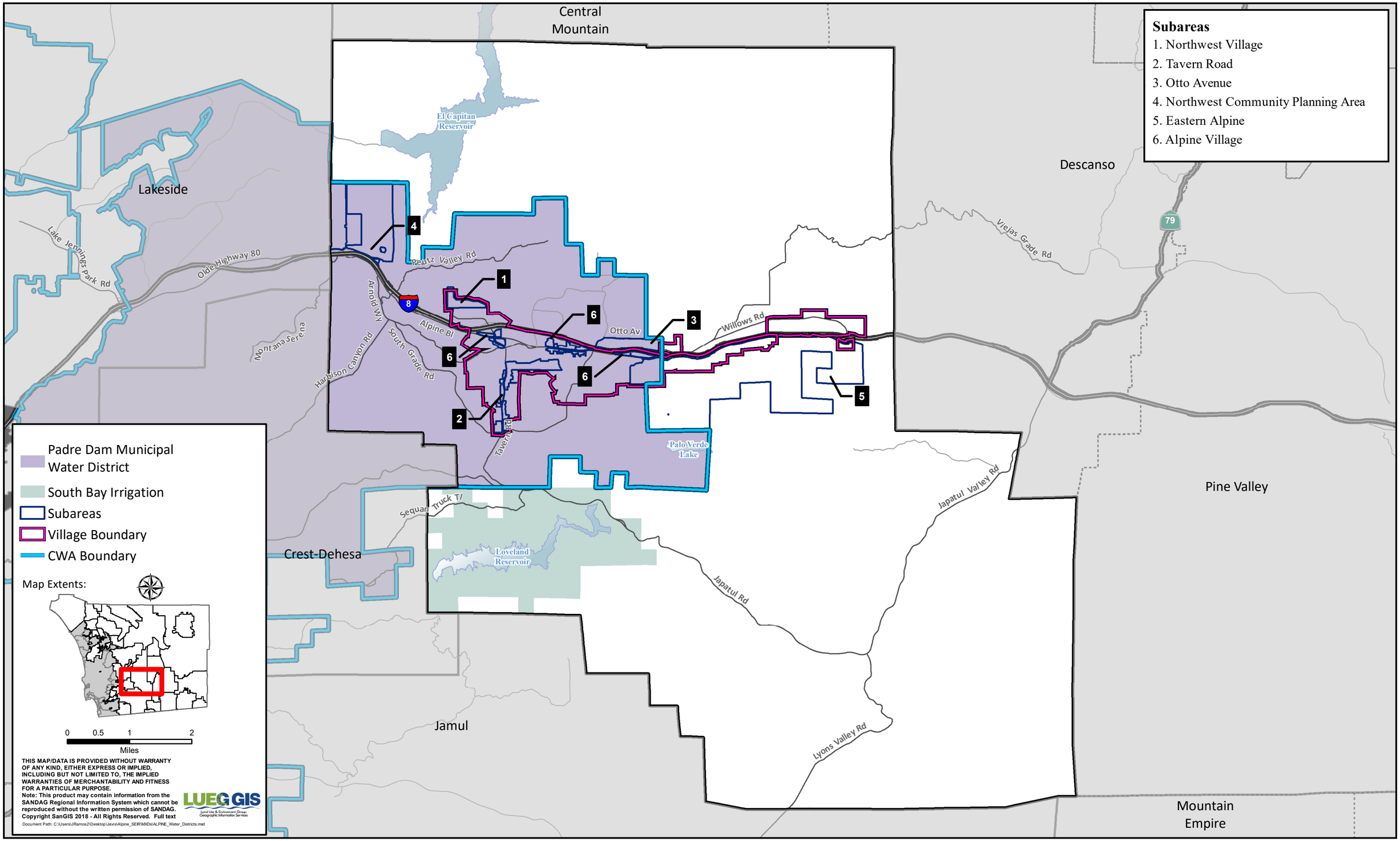
Source: SanGIS, County of San Diego, 2020

Figure 2.14-1a
Sanitation Districts
Subareas 1-6



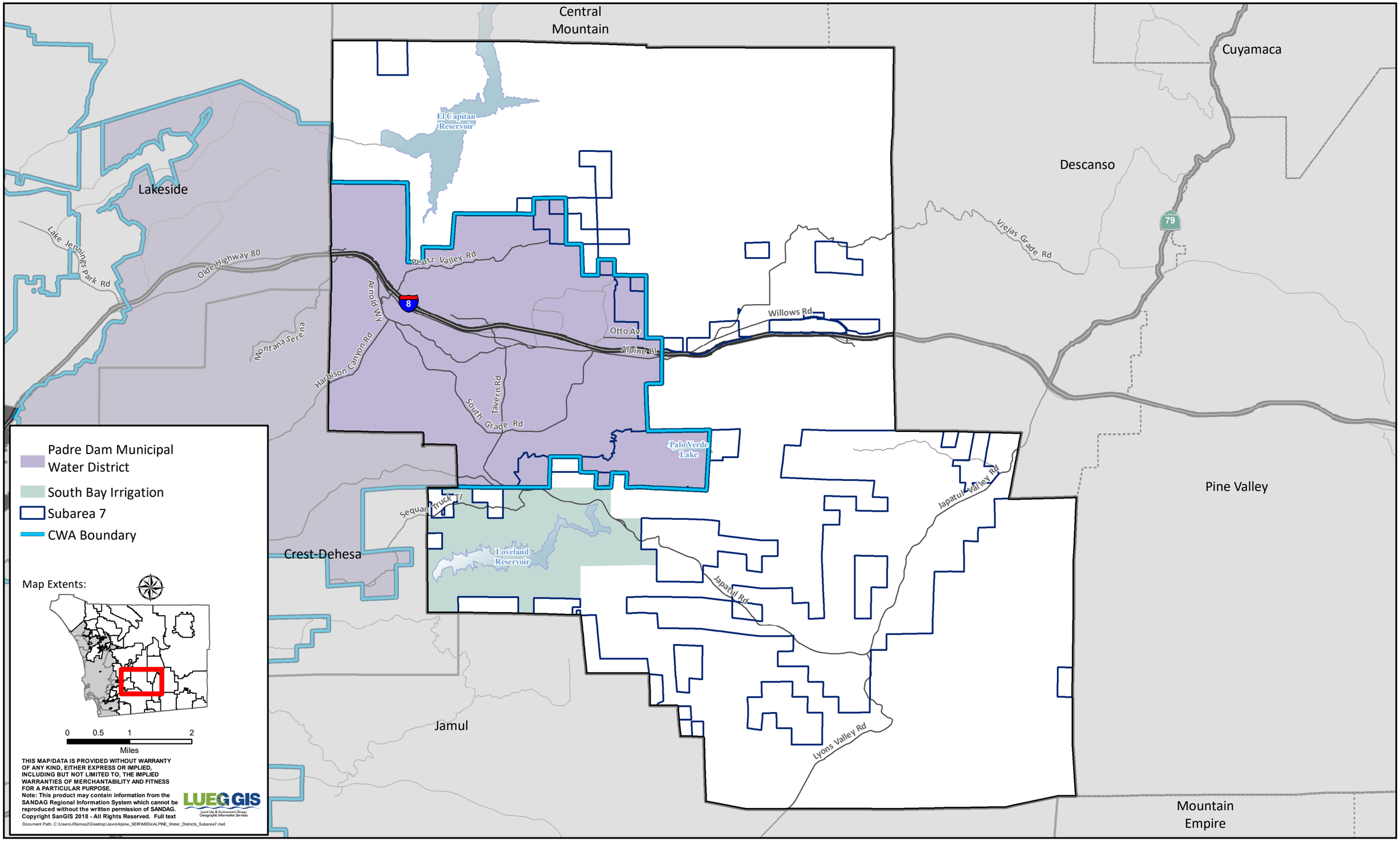
Source: SanGIS, County of San Diego, 2020

Figure 2.14-1b
Sanitation Districts
Subarea 7



Source: SanGIS, County of San Diego, 2019

Figure 2.14-2a
Water Districts
Subareas 1-6



Source: SanGIS, County of San Diego, 2019

Figure 2.14-2b
Water Districts
Subarea 7