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Feb 03 2021

STATE CLEARINGHOUSE

February 3, 2021

11-SD-8
PM 29.19

Alpine Community Plan Update
DSEIR/SCH #2018081093

Ms. Donna Beddow,
Planning Manager
San Diego County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Ms. Beddow:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Supplemental Environmental Impact Report (DSEIR), State Clearinghouse (SCH) #2018081093 for the Alpine Community Plan Update (CPU) located near Interstate 8 (I-8) in the community of Alpine. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Environmental

Caltrans appreciates opportunity to review this Draft Supplemental EIR. Should elements of the project and/or mitigation measures change to effect Caltrans Right-of-Way (R/W), we would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Caltrans expects you to initiate contact to discuss the elements of the project that impact Caltrans R/W and to coordinate the required information that Caltrans will use for our subsequent environmental compliance for the encroachment permit process.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, California Environmental Quality Act (CEQA) determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

Through the Responsible Agency coordination, Caltrans will engage with your efforts to ensure that the supporting documents address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DSEIR.

Traffic Engineering and Analysis

1. Subarea 4, 5 and 6 land use changes will trigger a transportation impact study (TIS) for the I-8 Freeway Intersections, ramps and freeway lanes. Once a new or existing development proposes a change, the development will need to provide Caltrans with a VMT-based TIS and show any impacts to Caltrans freeways, intersections, and ramp operations.
2. The Proposed Mobility Network Figures 1-12a and 1-12b show bicycle network and possible pedestrian facility improvements within Caltrans R/W.
 - a. Any proposed re-striping and road widening for Class IV Bike way or Class II bike lane within Caltrans R/W will require an Encroachment permit approval from Caltrans.
 - i. Tavern Road is currently a two-lane road/ bridge structure with about a two-foot shoulder. The Proposed Mobility Network Figure shows that a Class IV bike way is proposed on Tavern Road, so

- widening will be required by the County of San Diego or by the Developer to add a cycle track or protected bike lane. In addition, improvements to the bridge rail will also be required.
- ii. West Victoria Drive is currently a two-lane road/ bridge structure with about a two-foot shoulder. The Proposed Mobility Network Figure shows that a Class II bike lane is proposed on West Victoria Drive, so widening will be required by the County of San Diego or by the Developer to add a bike lane that meets Caltrans standards. In addition, improvements to the bridge rail will most likely be required.
 - iii. East Victoria Drive is currently a two-lane road/ undercrossing with about a five-foot shoulder. The Proposed Mobility Network Figure shows that a Class IV bike way is proposed on East Victoria Drive, so possible widening will be required by the County of San Diego or by the Developer to add a cycle track or protected bike lane.
 - iv. Willow Road on the west is currently a two-lane road/ bridge structure with about a two-foot shoulder. The Proposed Mobility Network Figure shows that a Class IV bike way is proposed on Willow Road, so widening will be required by the County of San Diego or by the Developer to add a cycle track or protected bike lane. In addition, improvements to the bridge rail will also be required.
 - v. Willow Road on the east is currently a two-lane road/ bridge structure with about a seven-foot shoulder. The Proposed Mobility Network Figure shows that a Class II bike lane is proposed on Willow Road, so widening might not be required by the County of San Diego or by the Developer to add a bike lane, but improvements to the bridge rail will be required.
- b. Any pedestrian facility improvements within Caltrans R/W will require an Encroachment permit approval from Caltrans and will need to follow Caltrans Standards and Caltrans DIB 82-06 guidelines.
 - i. Caltrans request early coordination efforts by developer or/and by local agency to come up with a design that works for both state and local agencies.
3. The Alpine CPU Existing Roadway Connections Figures 2-13a and 2-13b shows a bicycle network that does not currently exist.
 - a. Dunbar Lane undercrossing roadway is not striped with a bike lane in each direction. Update figure to show current conditions.

- b. Chocolate Summit Drive is not currently striped with a bike lane in each direction. Update figure to show current conditions.
 - c. West Victoria Drive and East Victoria Drive are not currently striped with a bike lane or cycle track in each direction. Update figure to show current conditions.
 - d. Both Willow Road overcrossing and road segment are not currently striped with a bike lane or cycle track in each direction. Update figure to show current conditions.
 - e. There are no existing Class IV Bike way facilities within Caltrans R/W or on local streets. Class II bike lanes do exist on some streets. Update figure to show current conditions.
4. The Alpine CPU Existing Roadway Connections (Figures 2-13a and 2-13b) and Proposed Mobility Network Figures (1-12a and 1-12b) shows Otto Avenue connected to Willow Road, but there is no existing connection that exist currently.
- a. Connecting Otto Avenue to Willow Road, thus creating an intersection spaced very closely to the I-8 westbound ramps intersection will impact Caltrans ramp operations and motorist's safety. There is no Otto Avenue intersection, but only a curvy Willow Road. Remove this segment of Otto Avenue from your existing conditions exhibits and proposals.
 - b. If this is a proposal then the Otto Avenue intersection with Willow Road will need to be built with a preferred minimum distance of 500 away from the Caltrans ramps curb return, per Caltrans Highway Design Manual (HDM) Section 500.
 - i. Per Caltrans HDM Section 504.3: **The minimum distance (curb return to curb return) between ramp intersections and local road intersections shall be 400 feet.** The preferred minimum distance should be 500 feet.
5. Any direct impact mitigation or new development will require the developer or agency to contact Caltrans's Planning department for further coordination.
6. Please refer to marked up attachments for further comments and details.

Hydraulics

Section 2.8: Hydrology and Water Quality

1. Will the increase in flows be mitigated? (i.e. detention, retention).
2. Provide copy of development plans.

3. Show and label all existing Caltrans drainage facilities within the project limits (i.e. size and material).
4. Provide a Hydrology and Hydraulics (H&H) Study.
 - a. The H&H Study shall contain existing and proposed watershed basin maps with individual basins for each affected Caltrans pipe system.
 - b. Consult NOAA Atlas 14 for rainfall intensities and precipitation depth values.
 - c. Provide ditch size calculations, if applicable.
 - d. Include copy of drainage related plans and records within the Study (i.e. As-builts, record drawings, etc.).
 - e. Include copy of referenced information from other approved development reports.
 - f. Caltrans offsite drainage facilities are designed using the 100-year storm event.
5. Coordinate with Caltrans' Survey Branch to obtain I-8 R/W to be shown and labeled on all plans and maps containing I-8. Clearly label Caltrans R/W vs City/County R/W vs Private R/W.
6. Coordinate with Caltrans' Survey Branch to obtain I-8 stationing, centerline, and alignment name to be shown and labeled on all plans and maps containing I-8.
7. Will these improvements remap the flood plain boundary?

Design

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 encourages close coordination with the County to incorporate complete streets concepts for all modes.

For the following policies, Caltrans recommends that any proposed changes to the State's transportation system adhere to Caltrans design standards.

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.

Ms. Donna Beddow
February 3, 2021
Page 6

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.

Active Transportation

The Alpine CPU generally appears consistent with the San Diego County Active Transportation Plan that was approved by the Board of Supervisors in 2018. The Alpine CPU and the County Active Transportation Plan include proposed facilities that will interface with Caltrans R/W along I-8, and the County will need to work with Caltrans, as they pursue the build out conditions laid out in the two plans.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch

Attachment

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

¹The 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 ID¹	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 ID¹	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

¹Total 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 M-1.4 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	Population¹	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	Threshold¹	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.

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
812	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>26¹</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>

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

Source: Appendix G

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 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

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.

Source: Appendix G

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

Mitigation Strategy	Potential to Reduce Impacts	Feasibility
		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 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**.

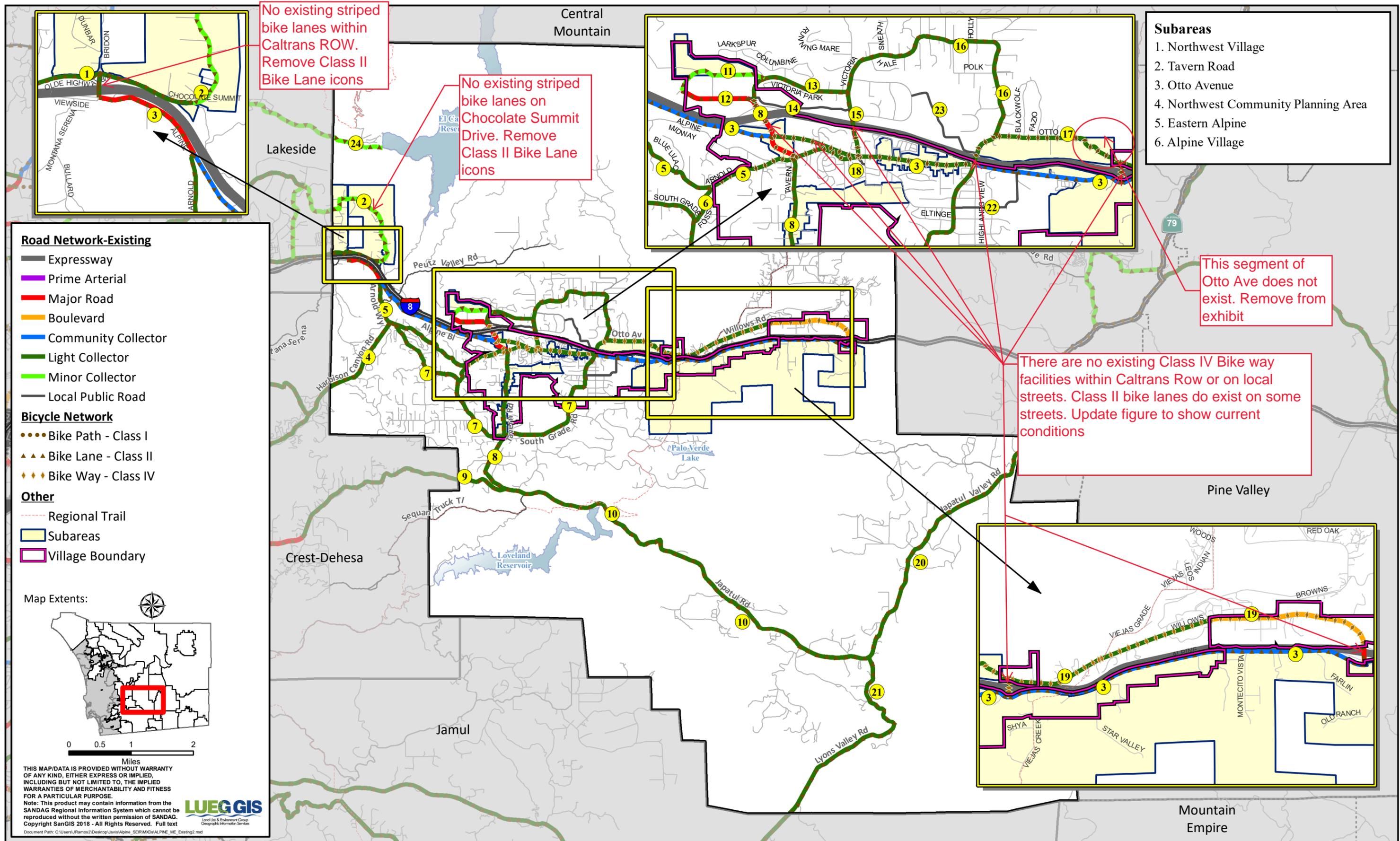
2.13.7.3 Issue 3: Substantially Increase Hazards Due to a Design

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

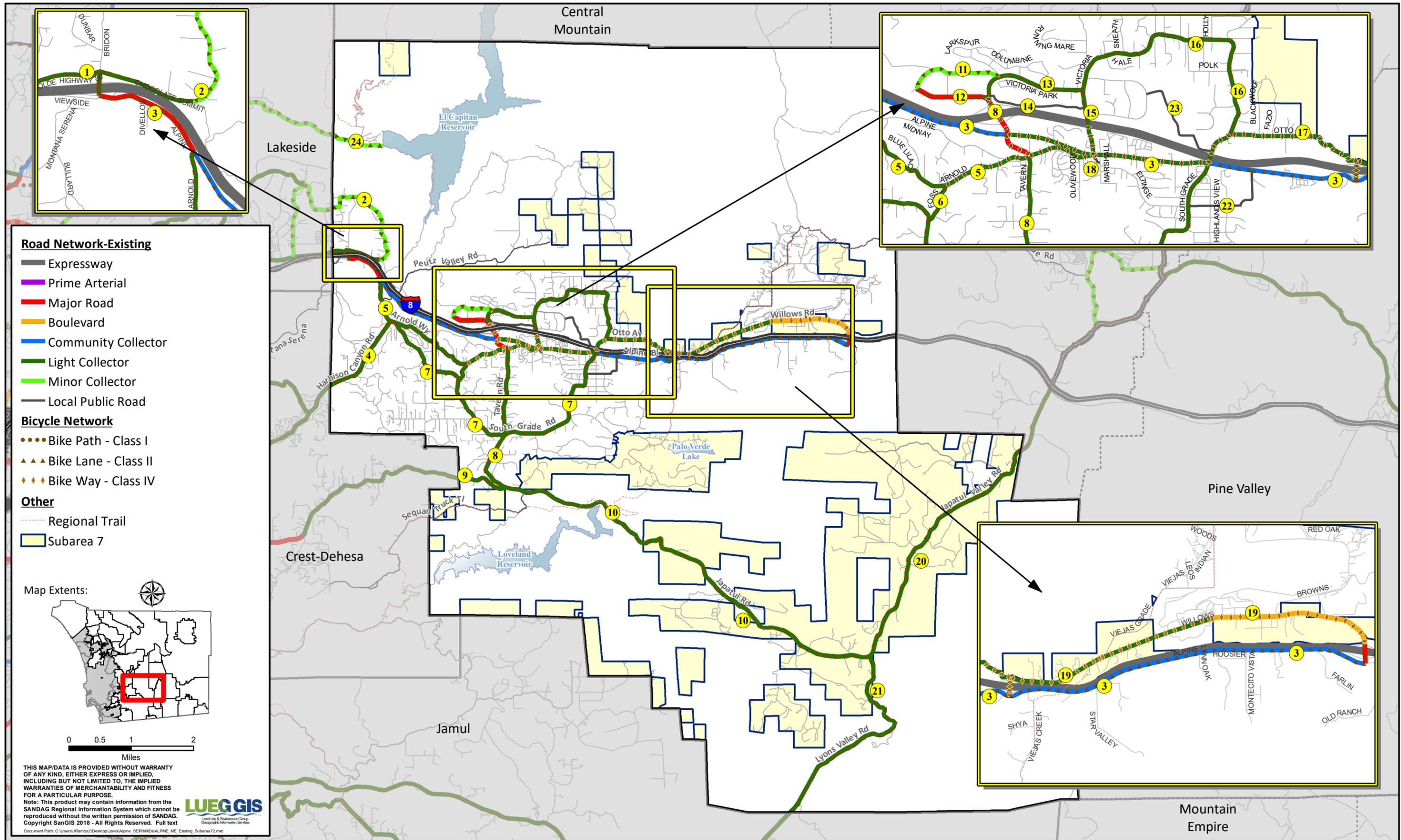
Implementation of the proposed project would not result in any new or more severe impacts regarding emergency access. Implementation of the prior EIR mitigation measures (Appendix B) would reduce the proposed project's impacts on emergency access to **less than significant**. Therefore, no new mitigation 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