

Chapter 6

No Project Alternatives

6.1 No Action Alternative

6.1.1 Summary of Significant Impacts

Under the No Action Alternative, neither the Proposed Action nor any of the alternatives examined in this EIR/EIS to provide the Water Authority with 100,000 AF of carryover storage capacity (i.e., Moosa 100K and SV 50K/Moosa 50K Alternatives) would be implemented. Because the ESP has previously been approved and permitted, the San Vicente Dam raise component of the ESP represents the No Action Alternative.

As stated in Section 1.1 (Introduction) of this EIR/EIS, the Water Authority approved the ESP in August 1996 to provide additional local water storage to meet emergency needs within their service area. Under the approved and permitted ESP, the San Vicente Dam would be raised 54 feet, and the San Vicente Reservoir would be expanded to accommodate 52,100 AF of usable emergency storage capacity. The ESP also includes the construction of associated pipelines, pump stations, and ancillary structures at the reservoir. Some of these improvements are currently under construction or in design, including the San Vicente Pipeline, San Vicente Pump Station/Surge Control Facility, and other appurtenances.

The ESP was evaluated in an EIR/EIS for which the Water Authority was Lead Agency under CEQA, and the U.S. Army Corps of Engineers (Corps) was Lead Agency under NEPA. The Water Authority's Board certified the Final EIR/EIS on August 15, 1996. The Corps issued a Record of Decision (ROD) for the EIR/EIS on August 4, 1997, and an Individual Permit under Section 404 of the Clean Water Act (Permit No. 95-2009200-DZ), which was issued on August 18, 1997.

In accordance with State CEQA Guidelines Section 15150 and CEQ regulations (40 CFR 1506.2), relevant information for this section from the ESP EIR/EIS has been incorporated by reference in this EIR/EIS for the CSP. The San Vicente Dam raise was addressed in three of the four alternatives evaluated in the ESP EIR/EIS, including the Olivenhain/Hodges/San Vicente Alternative, which was determined to be the environmentally superior alternative and was approved and permitted as the Proposed Action under the ESP.

In addition to impacts associated with the San Vicente Dam raise portion of the Olivenhain/Hodges/San Vicente Alternative, the ESP EIR/EIS addressed impacts associated with a new dam and reservoir at Olivenhain, re-operation of Lake Hodges, and associated pipelines and pump stations at all three locations. It is necessary to separate the significant impacts anticipated due to the action of raising San Vicente Dam and expanding San Vicente Reservoir by itself (rather than considering the entire Proposed Action under the ESP), because the No Action Alternative for the CSP would involve implementation of only the ESP dam and reservoir expansion at San Vicente Reservoir.

For the reasons stated above, Table 6.1-1 summarizes the findings of the ESP EIR/EIS with respect to the impacts and mitigation measures associated with only the San Vicente Dam raise (and reservoir expansion) portion of the ESP. Impacts were determined to be significant and mitigation measures were proposed for most environmental issues examined, except public utilities/services. Air quality impacts were determined to be significant and unmitigable until the completion of construction. Chapter 7.0 (Comparison of Alternatives) of this EIR/EIS presents a comparison of the No Action Alternative with the Proposed Action, the Moosa 100K Alternative and the SV 50K/Moosa 50K Alternative.

6.1.2 Growth-Inducing Impacts

The San Vicente Dam raise (and reservoir expansion) portion of the ESP would not induce growth for the following reasons:

- While water generally constitutes an essential resource, the supplies provided by the ESP would not cause the existing regional growth projections to be exceeded because (1) emergency storage would not be available to serve normal, day-to-day water demands; (2) the project has been sized to accommodate regionally accepted San Diego Association of Governments (SANDAG) growth projections; and (3) the project satisfies a major objective of the San Diego regional growth management strategy.
- The ESP would provide new, large-capacity water conveyance facilities that would connect the emergency storage reservoir(s) to the Water Authority's existing aqueduct

system, but would not extend new water service to existing areas or to new areas that were not already being served.

- From a regional perspective, any acceleration of growth in a particular area from a larger reservoir (e.g., San Vicente) would be relatively minor and insignificant in comparison to the other factors driving growth, such as employment and the economy, which are the basis for SANDAG’s population projections. Other factors that affect the amount, location, and rate of growth include market demand for housing, availability of commercial services, desirability of climate and living/working environment, and land use policies. Overall, growth projections would not be expected to change because of the project, even if some local growth shifting occurred.

Table 6.1-1. Summary of Applicable Significant Impacts/Mitigation for San Vicente Dam/Reservoir Portion of ESP

Impacts	Mitigation
Land Use (LU)	
The following significant impacts were identified:	Mitigation for significant impacts will include the following measures:
LU-2. Loss of existing concessions at San Vicente Reservoir.	LU-2. Compensate the City of San Diego for possible loss of business revenue at existing reservoir/lake from disruption of recreational activities during construction under terms of a joint-use agreement developed by the City and the Authority. Conduct a site specific septic/leach field system analysis and coordinate with property owners within the setback area. Utilize certified independent fee appraiser for areas requiring right-of-way acquisition, relocation assistance, or other forms of compensation. Landowners will be offered fair market value.
Visual Quality (VQ)	
The following significant impacts were identified:	Mitigation for significant impacts will include the following measures:
VQ-1. Visual quality and community character impacts on the upstream side of the reservoir.	VQ-1. Remove vegetation as late as possible in the construction phase.
VQ-3. Night sky glow associated with nighttime construction.	VQ-3. Use screened light structures for nighttime construction and select height, spacing, number, and type of light fixtures to minimize intrusive light escaping from the physical boundaries of the site.
Socioeconomics (SE)	
The following significant impacts were identified:	Mitigation for significant impacts will include the following measures:
SE-2. Loss of recreation-based concessions.	SE-2. Compensate the City of San Diego for possible loss of business revenue at existing reservoir/lake from disruption of recreational activities during construction under terms of a joint-use agreement developed by the City and the Authority.
Biological Resources (BR)	
The following significant impacts were identified:	Mitigation for significant impacts will include the following measures:
BR-1. Significant impacts would be associated with the direct loss (permanent and temporary) of the following habitats. Significant impacts would occur from direct impacts to regulated habitats or nonregulated natural habitats (chaparral and nonnative grassland) that are within MSCP and MHCP core and linkage areas. Acres directly impacted are shown for the alternative with the tunnel pipeline ⁽¹⁾ .	BR-1 through BR-5. Mitigation for significant direct and cumulative impacts to habitats and sensitive plants and wildlife, wildlife corridors, and MSCP/MHCP biological resource areas and linkages will be implemented by an individual method or combination of methods, which will include on-site revegetation and off-site creation of vegetation communities, acquisition and preservation of off-site habitat, and avoidance or project redesign. Permanent impacts to sensitive habitats (wetlands, coastal sage scrub, oak woodland, and perennial grassland) will be mitigated through off-site

Impacts	Mitigation
<ul style="list-style-type: none"> • 17.8 acres of wetlands and unvegetated waters of the U.S. • 205.7 acres of coastal sage scrub • 0.3 acre of perennial grassland • 9.7 acres of oak woodland • 138.3 acres of chaparral • 3.4 acres of nonnative grassland <p>BR-2. Significant direct impacts to the following sensitive plant species were identified (data shown are estimated numbers of plants impacted for the alternative with the tunnel pipeline):</p> <ul style="list-style-type: none"> • Delicate clarkia (343) (Group 2 species) • Engelmann oak (5) (Group 4 species) • Coast live oak (640) (Group 4 species) 	<p>acquisition of in-kind habitats. Temporary impacts to coastal sage scrub and oak woodland will also be mitigated off site. Permanent impacts to nonregulated habitats (chaparral and nonnative grassland only) within MSCP/MHCP core and linkage areas will be compensated off site. Indirect impacts will be mitigated for by implementing construction and operational procedures that minimize effects to on-site and off-site resources. Indirect impacts to occupied gnatcatcher habitat at facilities that cannot be constructed outside of the breeding season will be compensated for by purchasing additional off-site coastal sage scrub habitat. All off-site acquisition will, to the extent feasible, be within identified MSCP/MHCP biological core and linkage areas.</p> <p>Implementation of each plan is feasible and will ensure that all significant impacts to biological resources will be reduced to below a level of significance.</p>
<p>BR-3. Significant direct impacts to the following species or their habitats were identified:</p> <p><i>Group 1 species</i> California gnatcatcher, golden eagle Significant indirect impacts would occur to California gnatcatcher from construction noise, light, and human presence at facilities that could not be constructed outside the breeding season.</p>	
<p>BR-4. Direct impacts to the habitats of the following species as a result of implementation of this alternative would be a significant cumulative impact:</p> <p><i>Group 2 species</i> Hermes copper butterfly, western spadefoot toad, San Diego banded Gecko, San Diego horned lizard, Coronado skink, orange-throated whiptail, coastal western whiptail, silvery legless lizard, coastal rosy boa, coast patch-nosed snake, San Diego ring-neck snake, northern red diamond rattlesnake, southern California rufous-crowned sparrow, and Bell's sage sparrow.</p>	
<p>BR-5. Significant direct and indirect impacts would occur that would require implementation of specific project design features and operational procedures to comply with the MSCP and MHCP objectives for managing core biological resource areas, linkages, and buffers. Impacts would include loss of foraging and breeding habitat for sensitive wildlife species, and loss of populations of sensitive plant species.</p>	
Cultural Resources (CR)	
<p>The following significant impacts were identified:</p> <p>CR-1. Impacts to 11 prehistoric sites. CR-2. Impacts to one historic site. CR-3. Impacts to one multicomponent site. CR-4. Impacts to six sites containing Native American resources.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>CR-1 through CR-3. Conduct site importance evaluation and boundary testing. Prepare a data recovery program if avoidance and preservation are not feasible or appropriate.</p> <p>CR-4. Move rock carvings to higher ground if feasible. Partial mitigation for impacts to Native American resources include avoiding the area, tunneling, or restoring an area; impacts to sites containing Native American resources could be unmitigable, depending on the outcome of discussions with Native Americans.</p>

Impacts	Mitigation
Geology/Seismicity (GS)	
<p>The following significant impacts were identified:</p> <p>GS-2. Possible landslides that are located near the San Vicente Reservoir/Dam area; localized slope failure along cut slopes.</p> <p>GS-3. Underlying soils that pose severe erosion and high expansion potential.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>GS-2. Conduct site-specific geotechnical investigation and develop appropriate geotechnical design measures. Typical mitigation measures may include, but are not limited to, those listed below for specific impacts:</p> <ul style="list-style-type: none"> • Stabilize, remove, or avoid the sidemass. • Provide additional freeboard to protect dam from overtopping. • Evaluate stability of natural and cut slopes. <p>GS-3. Replace expansive soils with granular nonexpansive soils, treat expansive soils with lime. Design components to resist damage from expansive soils. Construct drainage control devices to route runoff from erodible soils. Provide seeding of disturbed and constructed slopes with ground cover vegetation. Minimize disturbance of existing vegetation and slopes.</p>
Paleontological Resources (PR)	
<p>The following significant impacts were identified:</p> <p>PR-1. Santiago Peak Volcanics (metasedimentary portion only), Poway Group, landslides (with sedimentary source), and colluvium (with sedimentary origin) have paleontological sensitivity and would be impacted if affected by construction of San Vicente Dam.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>PS-1. Complete detailed geologic field mapping and determine specific paleontological resource sensitivity prior to project construction. A paleontologist will inspect all areas where impacts to formations are expected to occur and will attend pre-construction meetings to consult with grading and excavation contractors. Also, a paleontologist will monitor construction and recover fossils if detected; clean, sort, and catalogue fossils; deposit fossils in an appropriate repository; and complete a final report that outlines the mitigation program.</p>
Water Resources (WR)	
<p>The following significant impacts were identified:</p> <p>WR-2. Change in water quality as reservoir is being filled.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>WR-2. Remove most of vegetation within the normal pool level prior to filling.</p>
Traffic and Transportation (TT)	
<p>The following significant impacts were identified:</p> <p>TT-1. Change in LOS from construction traffic at the SR-67/Vigilante Road unsignalized intersection.</p> <p>TT-3. Possible road damage from construction traffic.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>TT-1. Prepare traffic control plan and use traffic safety measures such as flagmen and two-way radios. These flaggers will allow the side street to clear and minimize the delay.</p> <p>TT-3. Conduct road inspection before and after project and complete any needed repairs.</p>
Air Quality (AQ)	
<p>The following significant impacts were identified:</p> <p>AQ-1. Combustion emissions and fugitive dust emissions.</p> <p>AQ-2. Total project construction impacts associated with the total peak day and annual average emissions.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>AQ-1 and AQ-2. To mitigate combustion emission impacts, use standard construction measures such as proper equipment maintenance and operation, maximize use of electric equipment, maintain equipment per manufacturer's specifications, and require all equipment to meet current emission standards. To mitigate fugitive dust emissions, minimize amount of disturbed area, use water trucks or sprinkler systems, water unpaved roads and other dust areas, spray water on all dirt stockpile areas as needed, stabilize all disturbed soil areas not subject to revegetation using nontoxic methods, complete paving as soon as possible, cover haul trucks, and sweep paved roadways.</p> <p>Impacts would remain significant and unmitigable until construction is completed.</p>

Impacts	Mitigation
Noise and Vibration (NV)	
<p>The following significant impacts were identified:</p> <p>NV-1. Impacts to residents during RCC night construction.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>NV-1. The construction contractor will be required to obtain a variance from the appropriate City or County agency to conduct nighttime construction if noise levels cannot be mitigated to below a level of significance. It may not be technologically feasible to construct barriers and/or enclosures that would reduce noise levels to the residential noise standard for nighttime.</p> <p>Prior to construction, a site-specific construction noise reduction study will be prepared to identify feasible measures to minimize noise from nighttime construction.</p>
Public Safety (P)	
<p>The following non-significant impacts were identified:</p> <p>P-1. Improbable chance of failure of San Vicente Dam.</p>	<p>Measures recommended to further reduce non-significant impacts of dam failure include the following:</p> <p>P-1. Design dam with a safety goal of one in a million (10^{-6}). Instrumentation will be provided in the dam to monitor hydraulic pressures and deformations in the dam. Dam break emergency response planning will be developed. For San Vicente Dam, the existing Emergency Response Plan will be reexamined and updated to satisfy new requirements.</p>
Public Utilities/Services (PU)	
<p>No significant impacts to public utilities/services were identified.</p>	<p>No mitigation will be required</p>
Energy (E)	
<p>E-1. Energy demands during the emergency period would be a substantial percentage of non-defense public services energy demand; this energy impact would be significant and unmitigable.</p>	<p>E-1. No mitigation would be available to reduce the energy impact of emergency operations to below a level of significance; however, these impacts would end after the emergency was over.</p>
Recreation (R)	
<p>The following significant impacts were identified:</p> <p>R-1. Disruption of existing recreational activities at San Vicente during construction.</p> <p>R-2. Shifting park users to surrounding recreational parks.</p> <p>R-3. Disruption of existing beaches and trails.</p>	<p>Mitigation for significant impacts will include the following measures:</p> <p>R-1 and R-2. The City will be compensated for possible loss of business revenue at San Vicente Reservoir during construction and increased recreation activity at other reservoirs and lakes under the terms of a joint-use agreement developed by the City and the Water Authority.</p> <p>R-3. Beaches will be constructed during building of new dam. Provide alternate trails or work with affected public agencies to provide an easement for a future trail in the reservoir area.</p>

⁽¹⁾ Although the No Action Alternative evaluated for the CSP does not include the San Vicente Pipeline, habitat impacts presented in the ESP EIR/EIS for this alternative combined both the reservoir and pipeline impacts together. Therefore, the tunnel option for this the pipeline was selected as being more representative of just the reservoir impacts because the trench option would impact a greater amount of habitats.

6.1.3 Cumulative Impacts

The significant cumulative impacts identified in the ESP EIR/EIS for the San Vicente Dam raise (and reservoir expansion) portion of the ESP that are still applicable today include construction impacts associated with air quality, noise, and traffic, and the cumulative loss of cultural and biological resources.

6.1.4 Irreversible or Irretrievable Commitments of Resources Involved

As the No Action Alternative, the San Vicente Dam raise (and reservoir expansion) portion of the ESP would cause a variety of environmental changes, including the irreversible commitment of certain resources throughout the estimated 100-year life of the ESP, based on the analysis contained in the 1996 ESP EIR/EIS. Irreversible commitments are defined as those that could not be recovered at the end of the 100-year life of the ESP. However, other resources would be consumed, destroyed, or otherwise degraded during construction, operation, maintenance, and abandonment of the ESP and could not be retrieved or replaced during the life of the ESP or beyond. Those resources were identified as irretrievable in the ESP EIR/EIS. Resources identified as irreversible and irretrievable in the ESP EIR/EIS were socioeconomics (commitment of construction labor force), biological resources (loss of vegetation communities and sensitive plant and animal species), cultural resources (loss of cultural resources including important Native American values), paleontological resources (loss of fossils with resource sensitivity), traffic/transportation (commitment of incremental increase to existing traffic levels due to construction/operation/recreation traffic), recreation (loss of some recreation capacity during construction), and energy (consumption of fuel during construction and operation).

6.1.5 Regional Effects

Without the carryover storage capacity provided by the Proposed Action, or the Moosa 100K or the SV 50K/Moosa 50K Alternatives, regional water storage reliability would be significantly reduced and the San Diego region could face water shortages during periods of extended droughts. The lack of locally stored water for use during extended peak demands or prolonged droughts would cause real economic harm to the region. Additional quantities of water would need to be purchased from the Metropolitan Water District of Southern California (MWD) at higher rates, driving up electrical demand for pumping facilities and water delivery costs. However, this assumes there would even be surplus water available for delivery during a prolonged drought, and excess capacity in the Water Authority's Aqueducts to convey the additional deliveries of water. If MWD member agencies were to also require additional water deliveries due to a prolonged drought, and Section 135 of the Metropolitan Act were invoked, the Water Authority could experience severe cutbacks in supplies. The ensuing water shortage could have devastating economic effects: agriculture would suffer direct impacts, tourism (a major factor in the San Diego region) would be negatively affected, new construction would be expected to decrease as new projects would be postponed, and landscaping businesses would falter. These impacts would multiply and ripple throughout the region.

6.1.6 No Federal Action Alternative

This alternative would be an action for which a Clean Water Act 404 Permit would not be required. In defining the “Basic Project Purpose” for an application in which a Clean Water Act permit is being considered, it is necessary to determine whether or not the Proposed Action is “water dependent.” According to the Section 404(b)(1) Guidelines, a project is considered water dependent if it requires access to or siting within, or is proximal to, waters of the U.S. as defined in the guidelines. The CSP is not water dependent in that it may not involve the discharge of fill material into jurisdictional wetlands and waters of the U.S. If an activity is not water dependent, the 404(b)(1) Guidelines create a legal presumption that practicable alternatives to an activity are available that do not involve a special aquatic site. For projects that are not water dependent, the 404(b)(1) Guidelines establishes a “rebuttable presumption.” In making its permit decision, the Corps must demonstrate that there are no available, practicable alternatives that do not involve special aquatic sites. The Corps must rebut the presumption in the guidelines that all practicable alternatives to the proposed activity that do not involve a discharge into a special aquatic site would have a less than adverse impact on the aquatic ecosystem.

The overall project purpose is to substantially increase the reliability and flexibility of the regional water supply by providing the Water Authority with facilities to provide approximately 100,000 AF of carryover storage capacity. All of the project alternatives previously considered for the CSP include water dependent options, such as new or expanded surface reservoirs, reoperation of existing reservoirs, and local or out-of-County groundwater basin storage. Carryover storage options that do not involve working within existing wetlands and waters of the U.S. may include the construction of enclosed water storage reservoirs or standpipes within upland areas. However, these options are not considered to be practicable or feasible for the following reasons:

1. A prohibitive number of large reservoirs would be necessary to accommodate 100,000 AF (equivalent to 32.6 billion gallons) of water for carryover storage purposes. For example, 3,260 storage tanks holding 10 million gallons each would be needed to contain this much water.
2. The amount of land area needed for construction of multiple upland area reservoirs may not be available.
3. The large-scale construction of upland area reservoirs, as well as the temporary and permanent roadways necessary to provide construction and maintenance access to the reservoirs, would result in significant environmental impacts, including impacts to sensitive biological resources and listed species.
4. The reservoirs must be geographically situated to provide optimal inflow, storage and delivery of water for local use as dictated by peak demands and drought conditions. Topographic, elevation, and hydraulic constraints are expected to be insurmountable for the large number of upland area reservoirs that would be needed for carryover storage purposes.

5. A myriad number of conveyance facilities (pipelines, pump stations, pressure reducing stations, etc.) would be required to connect the upland area storage reservoirs to the Water Authority's distribution system. Due to the extent of such a conveyance network, significant environmental impacts are anticipated to occur in upland areas and in areas containing wetlands and waters of the U.S.
6. Capital construction, land acquisition and energy (pump station operations) costs for an alternative that would not require a 404 Permit would be astronomical.

Given the reasons outlined above, this alternative is considered too speculative for further analysis in this EIR/EIS.

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