strategy is to create more compact communities in an effort to reduce the overall amount of travel by vehicles. This alternative could help to accomplish this objective, but the tradeoff is more vehicle traffic in the area surrounding the project. Because this alternative would result in a larger population and generate more trips, direct emissions of greenhouse gas emissions would be more than the proposed project; thus the contribution to global warming of the population generated under this alternative would be greater than that of the proposed project. However, the development density provided in this alternative could reduce vehicle miles traveled, encourage alternate travel modes, including walking and biking, and reduce energy demand compared to the population from less dense development. Therefore, this alternative could overall generate fewer greenhouse gas emissions per capita. (DEIR, p. 7-42.)

Impacts Potentially Less Severe Than the Proposed Project

The SACOG/Blueprint Increased Units/Same Development Footprint Alternative conforms to SACOG's Preferred Blueprint Plan, a plan adopted for the purpose of mitigating environmental effects. Under this alternative, no conflicts with principles of the Blueprint Plan would occur. (DEIR, p. 7-43.)

In some impact categories, per capita impacts are reduced under this alternative as compared to the proposed project. For example, the denser development of this alternative would likely reduce per capita water consumption due to a decrease in irrigated landscaping associated with the change from large residential lots to smaller lots. It should be noted that overall water consumption may go up since the decreased per capita water consumption may not entirely offset the increased water consumption from the increased total number of dwelling units. (DEIR, p. 7-43.)

In terms of conservation of natural resources in the cumulative context, the SACOG/Blueprint Increased Units/Same Development Footprint Alternative may contribute to efforts to reduce the long-term loss of agricultural land and sensitive species habitat. This alternative may preserve habitat and avoid sensitive resources in other parts of the Sacramento region by providing an increased supply of housing that will otherwise, over time, be built instead in areas that are currently in agriculture/open space. However, development under the Blueprint scenario does not currently provide a mechanism for ensuring that this open space is not otherwise lost, with the exception of any purchases or easements that are secured as mitigation for loss of habitat or other resources as a direct result of the project. (DEIR, p. 7-43.)

The SACOG/Blueprint Increased Units/Same Development Footprint Alternative would help the region reduce overall air emissions given the same regional population growth, because it is designed to decrease the length of vehicle trips and increase use of public transit. (DEIR, p. 7-43.)

Further, although the SACOG/Blueprint Increased Units/Same Development Footprint Alternative would contribute to a cumulatively considerable loss of farmland throughout

Placer County, the region, and the State, the increased number of dwelling units under this alternative could reduce the amount of agricultural land converted to residential development elsewhere in the region by helping the region to meet the demand for housing caused by projected regional population growth. (DEIR, p. 7-43.)

This alternative would generally increase the severity of most the less-than-significant and significant impacts identified for the proposed project, including those related to aesthetics, agricultural resources, air quality, cultural resources, hydrology and water quality, and transportation, and noise, would be more severe and significant under this alternative. (DEIR, p. 7-43.)

Although viewing impacts in a CEQA-related context leads to the conclusion that the SACOG/Blueprint Increased Units/Same Development Footprint Alternative, the Blueprint scenario, is the least desirable from an environmental perspective due to its direct impacts, the alternative could have superior long-term regional environmental benefits. Those, however, would likely only occur to their fullest possible extent if a similar regional approach to growth is pursued by all affected jurisdictions. However, even in the absence of similar planning commitments by other jurisdictions, approval by Placer County of this alternative could, by reducing per capita consumption of various resources, as well as by reducing per capita air pollution and vehicle miles traveled, have the effect of reducing the extent to which population growth and development, with their attendant environmental impacts, would occur elsewhere in the region. (DEIR, p. 7-43.)

3. Feasibility of the SACOG/Blueprint Increased Units/Same Development Footprint Alternative

This alternative would meet the project objectives in that it would provide a University and adjacent Community on the donated land, with the linkages and potential for interaction between the University and Community. This alternative would be consistent with smart growth principles due to its density and could incorporate each of the other components defined in the project objectives. Although this alternative includes more dense development than the proposed project, it is generally consistent with the objectives set forth for the proposed project. (DEIR, p. 7-44.)

The Board finds that the SACOG/Blueprint Increased Units/Same Development Footprint Alternative is environmentally inferior to the project. As shown in Draft EIR Table 7-11, this alternative would result in greater impacts to water demand, and solid waste, wastewater, and air emissions as compared to the proposed project. (DEIR, p. 7-42.)

It is not clear that, under CEQA, the Board must reject this alternative as infeasible in order to approve the RUSP as proposed. This is because, as explained earlier, the "substantive mandate" of CEQA is concerned with means of *reducing* the severity of significant environmental effects, so that an alternative with *greater* levels of impact need not be considered for adoption, even if it is "feasible."

This alternative would create more vehicle trips and cause a substantial increase in emissions, thus affecting the region's air quality. Because this alternative would result in a larger population and generate more trips, direct emissions of greenhouse gas would be more than under the proposed project. Thus, the contribution to global warming generated under this alternative would be greater than under the proposed project. (DEIR, p. 7-42.)

The increase of residents under this alternative would also cause an increase in the needed public services, including schools, police, fire, and emergency services.

Still, there are environmental benefits to high density, as noted earlier; and we recognize them. For example, increased development density and intensity sometimes shorten travel distances and potentially increases travel by walking and bicycling, not to mention increasing the number of people in close proximity to transit. Similarly, high densities, in the long-term, can reduce overall vehicle miles traveled, encourage alternate travel modes, including walking and biking, and reduce energy demand compared to the population from less dense development. (DEIR, p. 7-42.)

As noted earlier, however, "the RUSP is a more fine-grained planning of the site" compared with the view from 30,000 feet found in "2050 Blueprint Scenario." (Letter from Michael McKeever to Michael Johnson, September 24, 2008.) Thus, the RUSP embodies the long-term environmental benefits associated with "smart growth" principles associated with "the Blueprint."

Even so, the EPS Memorandum, which the Board finds to be persuasive, found the SACOG/Blueprint Increased Units/Same Development Footprint Alternative, with its substantially increased number of housing units compared with the RUSP, to be infeasible:

Alternative 5 is infeasible for two reasons that compound each other. First, the single-family per unit rate (\$2,230) in this alternative would exceed the feasibility target (\$1,870) described earlier. A greater annual special tax/assessment would create an additional burden for the homeowner and put the alternative at a competitive disadvantage compared with projects in surrounding jurisdictions. And second, Alternative 5 includes an overabundance of high density product types. Because high density residential products comprise a very limited share of the Southwest Placer real estate market, a project consisting exclusively of higher density units would require significant more time for absorption into the market. An extended absorption timeline would delay cash flow generated by the project, making it potentially infeasible to develop. For these reasons, a reasonably prudent landowner would not proceed with the alternative.

(EPS Memorandum, p. 15.)

For the reasons stated above, the Board finds the SACOG/Blueprint Increased Units/Same Development Footprint Alternative to be infeasible and rejects it as a viable alternative to the project.

XIII. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the Placer County Board of Supervisors' approval of the Regional University Specific Plan Project will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives which would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the Board chooses to approve the project because, in its view, the economic, social, and other benefits that the project will produce will render the significant effects acceptable.

In making this Statement of Overriding Considerations in support of the findings of fact and the project, the Board of Supervisors has considered the information contained in the FEIR for the project as well as the public testimony and record in proceedings in which the project was considered. The Board has balanced the project's benefits against the unavoidable adverse impacts identified in the FEIR. The Board hereby determines that the project's benefits outweigh the significant unmitigated adverse impacts.

A. SIGNIFICANT AND UNAVOIDABLE IMPACTS

As discussed in Section XI.A.1, *supra*, the Regional University Specific Plan project will result in the following significant and unavoidable impacts, even with the implementation of all feasible mitigation:

Project-Specific Significant and Unavoidable Impacts

Project-specific significant and unavoidable impacts identified for the proposed project include:

- 6.1-1 Development of the proposed project could be incompatible with the agricultural character of the natural landscape in the project site and its surrounding areas.
- 6.1-2 Development of the proposed project could introduce new sources of light and glare to the specific plan and surrounding areas, which could contribute to the discomfort glare or disability glare experienced by adjacent residences and other uses.

- 6.2-1 The proposed project could convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program to non-agricultural use.
- 6.2-2 The proposed project could create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment.
- 6.2-3 The proposed project could conflict with existing zoning for agricultural use or with a Williamson Act contract.
- 6.3-1 The proposed project could generate PM10 through land-clearing and other earthmoving activities during construction.
- 6.3-2 The proposed project could generate emissions of ROG, NOx, and CO during construction.
- 6.3-3 The proposed project could generate PM2.5 through the use of heavy-duty equipment during construction.
- 6.3-4 The proposed project's long-term operational emissions could exceed PCAPCD thresholds of significance for PM10, ROG, NOx, and CO.
- 6.4-1 Development of the proposed project, including off-site infrastructure, could result in the conversion of the project site to another use, which could affect the availability of habitat and biological function.
- 6.4-2 The proposed project could result in the filling or adverse modification of jurisdictional wetlands, non-jurisdictional wetlands, and other "waters of the U.S."
- 6.4-3 Development of the proposed project could result in the loss of special-status vernal pool crustacean and amphibian species and degradation and/or loss of their habitat.
- 6.4-8 The proposed project could result in the loss of foraging habitat for Swainson's hawk, white tailed kite, burrowing owl, and other raptors.
- 6.4-12 Development of the proposed project could result in habitat fragmentation and wildlife population isolation.
- 6.5-1 The proposed project could cause a substantial adverse change in the significance of a unique archaeological resource or an historical resource as defined in section 21083.2 of CEQA and section 15064.5 of the State CEQA Guidelines.

- 6.9-5 Noise from the University athletic facilities, including a stadium, that could be developed as part of the proposed project could affect sensitive receptors.
- 6.12-1 The proposed project could contribute to traffic volumes that exceed the capacity of the regional roadway network under existing plus project conditions.
- 6.12-2 The proposed project could increase daily traffic volumes using City of Roseville roadway segments, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-3 The proposed project could increase daily traffic volumes using Sacramento County roadway segments, exacerbating unacceptable LOS conditions under existing plus project conditions.
- 6.12-4 The proposed project could increase daily traffic volumes using Caltrans roadway segments, exacerbating unacceptable LOS conditions under existing plus project conditions.
- 6.12-6 The proposed project could increase peak hour traffic volumes using City of Roseville intersections, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-7 The proposed project could increase peak hour traffic volumes using Sutter County intersections, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-8 The proposed project could increase peak hour traffic volumes using Sacramento County intersections, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-9 The proposed project could increase peak hour traffic volumes using Caltrans intersections resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-16 The proposed project could increase peak hour traffic volumes using Caltrans ramp junctions, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-17 The proposed project could generate substantial vehicle traffic flows before and after special events at the stadium that may exceed the typical weekday peak hour operational capacity of the local and regional roadways.
- 6.12-18 The proposed project could generate vehicle parking demand that may exceed available supply during special events at the stadium.

(DEIR, pp. 8-1 to 8-3.)

Cumulative Significant and Unavoidable Impacts

The cumulative impacts associated with various categories of environmental impacts are discussed at the end of each chapter addressing environmental impact. In summary, the cumulative significant and unavoidable impacts identified for the proposed project include:

- 6.1-3 The proposed project, in combination with other cumulative development in west Placer County, could be incompatible with the agricultural character of the natural landscape in the project site and its surrounding areas.
- 6.1-4 The proposed project, in combination with other cumulative development in west Placer County, could contribute to sky glow and diminished views of the night sky experienced by residents of west Placer County.
- 6.2-4 The proposed project, in conjunction with other development in Placer County, could convert Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance) as defined in the California Department of Conservation Farmland Mapping and Monitoring Program, to non-agricultural uses.
- 6.2-5 The proposed project, in conjunction with other development in Placer County, could create potential conflicts with County goals, policies, and standards that may lead to physical impacts on the environment.
- 6.2-6 The proposed project, in conjunction with other development in west Placer County, could conflict with existing zoning for agricultural use or with a Williamson Act contract.
- 6.3-9 Construction of the proposed project, in combination with other construction and agricultural activities in the vicinity of the Plan Area, could add to cumulative levels of PM10 during construction.
- 6.3-10 Construction of the proposed project, in combination with other sources of criteria pollutants in the region, could temporarily add to criteria pollutant levels in the air basin.
- 6.3-11 The proposed project could contribute to cumulative levels of PM2.5.
- 6.3-12 The proposed project's long-term operational emissions could add to the cumulative levels of criteria pollutant levels in the air basin.

- 6.4-13 Construction of the proposed project, in combination with other development in the county, could contribute to the loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region.
- 6.5-4 The proposed project, in combination with other development in the Sacramento region, could adversely affect unique archaeological resources or historical resources as defined in section 21083.2 of CEQA and section 15064.5 of the State CEQA Guidelines.
- 6.8-10 The proposed project, in combination with the buildout of Placer County and the City of Roseville General Plans, could result in degradation of water quality from stormwater runoff.
- 6.8-11 The proposed project, in combination with the buildout of Placer County and the City of Roseville General Plans, could result in the construction of residences and other structures within the pre-construction 100-year FEMA floodplain.
- 6.11-7 The proposed project, in combination with other development, could require the construction of new or expansion of the existing landfill and MRF, which could result in significant adverse environmental effects.
- 6.12-19 The proposed project could increase daily traffic volumes using City of Roseville roadway segments, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-20 The proposed project could increase daily traffic volumes using Sacramento County roadway segments, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-21 The proposed project could increase daily traffic volumes using Caltrans roadway segments, exacerbating unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-16 The proposed project could increase peak hour traffic volumes using Placer
 County intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-17 The proposed project could increase peak hour traffic volumes using City of Roseville intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-21 The proposed project could increase peak hour traffic volumes using Sutter County intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.

- 6.12-22 The proposed project could increase peak hour traffic volumes using Sacramento County intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-20 The proposed project could increase peak hour traffic volumes using Caltrans intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-23 The proposed project could increase peak hour traffic volumes using Caltrans ramp junctions, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-22 The proposed project could increase peak hour traffic volumes using Roseville CIP intersections, resulting in unacceptable LOS conditions under 2020 conditions plus the RUSP with an extension of Watt Avenue to the project site.
- 6.12-23 The proposed project could increase peak hour traffic volumes using Roseville CIP intersections, resulting in unacceptable LOS conditions under 2020 conditions plus the RUSP with an extension of Watt Avenue to Blue Oaks Boulevard.
- 6.12-24 The proposed project could increase demand for public transit service beyond that currently planned and may result in unmet transit needs.
- 6.12-28 Mitigation measures implemented to reduce transportation impacts could adversely affect traffic in other jurisdictions.
- 6.12-29 Mitigation measures implemented to reduce transportation impacts could adversely affect the natural environment.
- 6.13-1 Development of the RUSP could potentially result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change.

(DEIR, pp. 7-3 to 7-7.)

B. OVERRIDING CONSIDERATIONS

In the Board's judgment, the proposed project and its benefits outweigh its unavoidable significant effects. The following statement identifies the reasons why, in the Board's judgment, the benefits of the project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Board would stand by its determination that each individual reason is

sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section (XIII), and in the documents found in the Record of Proceedings, as defined in section VI.

The project provides a unique opportunity for the County to achieve a variety of important goals that will benefit both the County and the region. It serves as an example of a comprehensive urban community, combining a mix of residential, commercial, employment, educational and recreational uses. The project also reflects the extensive involvement of a community to actively debate and work together in creating a balanced, comprehensive vision.

Some of the project benefits include the following principles:

1. Establish a well-respected four-year University that will serve Placer County's residents, attract talented students and staff, and provide a catalyst for business, cultural, and athletic opportunities.

The Regional University Specific Plan will provide a unique opportunity to establish a well-respected four-year University on the western 600 acres of the project site. The University will be a catalyst for business, cultural, and athletic development in Placer County and will provide the nucleus for research and economic de3velopment opportunities in Placer County and beyond. The greater Sacramento metropolitan area is deficient in institutions of higher education and the local presence of a University will provide additional advanced educational opportunities, especially for residents of Placer County. The University is programmed for a full range of academic, administrative, athletic, and performing arts facilities; a stadium; faculty and staff housing; student housing; and a retirement village. The project will provide on-campus housing opportunities, including residence halls for students, a village of homes for faculty/staff, and a retirement housing complex.

2. Establish a mixed-use community adjacent to the University, which incorporates smart-growth principles and is attractive to residents, employers and commercial service providers.

The Regional University Specific Plan is planned to accommodate the long-term growth needs of the County by establishing a mix of residential neighborhood developments, uniquely situated adjacent to the University and around public amenities, employment potential, housing, shopping, recreational uses and transportation options. The project will foster a sense of community and identity throughout the Plan Area by providing distinct neighborhoods with a cohesive design image.

The Specific Plan area will be connected through a circulation system that encourages pedestrian and bicycle usage by providing wide sidewalks and bikeways. The University Village would serve as shared activity center for the University and Community, where

faculty, students, and community residents can come together for retail, business, entertainment, and recreation.

The University and Community are designed as stand-alone projects, yet are planned to link to potential future adjacent development. The University and Community would be located to take advantage of: (1) 600 acres of land provided for the University campus; (2) 536 acres of land provided for the development of the Community, the entire net proceeds of which will fund the University, requiring no taxpayer funds; (3) adjacency to planned development (West Roseville Specific Plan); (4) ability to connect to the future regional transportation and infrastructure system (Watt Avenue, Pleasant Grove Boulevard, Base Line Road, and Placer Parkway at Watt Avenue).

3. Provide a diversity of housing choices – types, styles, densities and costs.

The project will provide a diversity of Community housing opportunities for households of differing income levels, with approximately 3,200 dwelling units, distributed between low density (approximately 20 percent), medium density (approximately 50 percent), and high density residential (approximately 30 percent), with overall densities higher than historically developed in Placer County. The project includes requirements to enhance affordable housing opportunities in Placer County.

4. The Project will provide both construction jobs and permanent jobs to residents of Placer County and surrounding areas.

Both during the construction period and after full build-out, the Regional University Specific Plan will provide a wide variety of employment opportunities for residents of Placer County and surrounding areas. Such jobs will include construction-related jobs, as well as jobs in the portions of the Specific Plan area devoted to University, retail, office, and other job-generating uses. These jobs will range from relatively low-paid entry level jobs to relatively high paid professional jobs.

5. The Project will facilitate the construction of new transportation infrastructure and the provision of new public facilities that will serve the residents of south Placer County.

The project will provide, or contribute its fair share to the provision of, all public facilities and services necessary to meet the needs of development within the Specific Plan area. The Development Agreement provides for payments towards, the dedication of, or the accelerated construction of local and regional transportation infrastructure, parks, and other public facilities which are over and above the measures required to mitigate for the impacts of the Project.

C. CONCLUSION

The Board has balanced these benefits and considerations against the potentially significant unavoidable environmental effects of the project and has concluded that the impacts are outweighed by these benefits, among others. After balancing environmental costs against project benefits, the Board has concluded that the benefits the County will derive from the project, as compared to existing and planned future conditions, outweigh the risks. The Board believes the project benefits outlined above override the significant and unavoidable environmental costs associated with the project.

In sum, the Board adopts the mitigation measures in the final Mitigation Monitoring and Reporting Program and finds that any residual or remaining effects on the environment resulting from the project, identified as significant and unavoidable in the preceding Findings of Fact, are acceptable due to the benefits set forth in this Statement of Overriding Considerations.