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# **CHAPTER 8**

## **CEQA REQUIRED DISCUSSIONS**

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## **CHAPTER 8 CEQA REQUIRED DISCUSSIONS**

Section 15126 of the CEQA Guidelines requires that an EIR must consider all components of a project when evaluating its impact on the environment, including planning, acquisition, development, short-term and long-term operations, and cumulative impacts. In accordance with CEQA, this chapter identifies the following:

- Significant environmental effects of the proposed project;
- Significant environmental effects that cannot be avoided if the proposed project is implemented;
- Significant irreversible environmental changes that would result from implementation of the proposed project;
- Growth inducing impacts of the proposed project;
- Cumulative impacts of regional development including the proposed project; and
- Alternatives to the proposed project.

### **8.1 SIGNIFICANT ENVIRONMENTAL IMPACTS**

CHAPTER 2 EXECUTIVE SUMMARY and CHAPTERS 4 through 7 of this EIR provide a comprehensive identification and evaluation of the proposed project's environmental impacts, including significance determinations for the impact both before and after mitigation is implemented. These chapters also include mitigation measures to avoid, minimize, or mitigate environmental impacts.

### **8.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS**

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided or minimized to a less than significant level with the implementation of feasible mitigation measures. The significant environmental impacts of this project are discussed in detail in CHAPTERS 4 through 7 of this EIR, and mitigation measures identified for all significant impacts are sufficient to reduce the impact to a less than significant level. No impacts remain Significant and Unavoidable.

### **8.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS**

Section 15126.2(c) of the CEQA Guidelines mandates a discussion of any significant irreversible environmental effects that would be caused by the proposed project. Specifically, this section states:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes the removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

To summarize, a project would result in significant irreversible environmental changes if:

- The project would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential accidents associated with the project; and
- The proposed consumption of resources is not justified (i.e., the project involves wasteful use of energy).

The five-acre project site is currently vacant, and no commercial, residential, or agricultural activities are pursued on the site. Historically, it was the site of an apple orchard and remains partially populated with remnant apple trees. Vegetation onsite is characterized by non-native annual grasses, shrubs, and trees including apple, pine, locust, and several varieties of native oaks (ECORP, 2003). Primary impacts of project implementation would include the conversion of the currently vacant site to heavy commercial uses. This would create an increase in the impervious surfaces of the project and contribute to increases in traffic and noise in the project area. Implementation of the project as proposed would result in the irreversible conversion to commercial uses of approximately five acres of vacant, disturbed land. The proposed project would result in approximately 2% building coverage of the project site (not including the water tank and coverage associated with the concrete plant itself), with a majority of the site used for parking, onsite circulation, and material storage. The potential irreversible environmental changes to which the project would contribute are discussed below.

The *Placer County General Plan* designates the project site for commercial uses, while surrounding parcels along Ophir Road are designated for commercial and industrial land uses. The General Plan therefore provides for the continued expansion of commercial and industrial development on the project site and along both sides of Ophir Road in the immediate vicinity of the project site. Therefore, the potential irreversible environmental changes to which the project would contribute are anticipated under the County's General Plan.

Operation of the proposed concrete batch plant would require use of water, electricity to power the pumps and machinery, and vehicle fuel. The proposed project would generate increased traffic levels in the immediate vicinity of the project as a result of truck and employee vehicle trips generated by the project. Existing plus project conditions for 2025 indicate that increased traffic volumes generated by the proposed project may exacerbate future (2025) conditions at the Taylor Road/Ophir Road/Interstate 80 offramp intersection. This is considered a potentially significant impact to this intersection. *Mitigation Measure 5.2a* for existing plus project conditions would reduce the level of significance of the project impacts to transportation and circulation to a less than significant level. The project may also contribute to traffic hazards on Ophir Road as a result of vehicle ingress and egress from the project site. *Mitigation Measures 5.4a and 5.4b* would reduce this impact to a less than significant level.

The proposed project would result in irreversible alterations to onsite hydrology as a result of grading and addition of impervious surfaces and catch basins. Approximately 73 percent of the site would be paved, while the remainder would be landscaped or used for a septic leach field. During operation, the plant is estimated to use between 7,000 and 10,000 gallons of water per day during summer months, with reduced water consumption during winter months.

Mitigation measures identified in CHAPTER 6 HYDROLOGY AND WATER QUALITY would ensure that impacts resulting from changes to onsite hydrology and groundwater quality would remain less than significant. While water usage is not expected to create a significant impact, it represents an irreversible physical impact of the project.

Noise levels generated by the proposed project would not exceed County standards for noise-sensitive land uses in the project area and would not result in an increase over existing ambient noise levels. However, the proposed project would introduce a land use on the currently vacant project site that would result in long-term elevation of noise levels on the project site and contribute to ambient noise in the vicinity of the proposed project. Although noise impacts of the proposed project would be less than significant, noise generation on the project site is considered an irreversible impact of the proposed project.

#### **8.4 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT**

The CEQA Guidelines require an EIR to evaluate indirect or secondary effects of a project, which may include growth-inducing effects. Section 15126.2(d) of the CEQA Guidelines states that a project could be considered growth-inducing if it would “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” A development project may have growth-inducing potential if, for example, it extends infrastructure (e.g., water, sewer, roads) to undeveloped areas or increases the capacity of existing infrastructure; promotes similar development to occur on adjacent parcels; increases the area’s housing supply; or introduces new employment to an area.

In the absence of other favorable conditions, however, it is unlikely that any one of these components could induce significant growth. The magnitude, location, and timing of growth are ultimately determined by a mix of economic, political, physical, and social factors. Variables including regional economic trends, housing demand, land availability and cost, quality of infrastructure and public services, proximity to employment centers, and regulatory considerations affect the way in which growth occurs.

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the extent to which growth could be induced, accelerated, intensified, or shifted as a result of developing the proposed project. The framework for a discussion of these potential growth-inducing impacts includes contemplation of the following questions:

- Would the project foster economic or population growth or the construction of additional housing?
- Would the project remove obstacles to population growth?
- Would the project tax existing community facilities to the point of requiring construction of new facilities (construction of which may adversely impact the environment)?
- Would the project encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively?

The potential for the Livingston’s Concrete Batch Plant project to induce growth in the project vicinity was evaluated qualitatively based on existing land use designations and existing

development in the area, and the availability of infrastructure in the project area. These project elements were used to determine whether or not the project would induce additional growth beyond the amount anticipated in the *Placer County General Plan*.

Parcels west and northwest of the project site are developed with commercial and industrial uses including a propane supply company and landscape products supplier. The parcel north of the site (across Ophir Road) supports an existing residence on the eastern portion, while the western portion is vacant and designated for commercial development. The parcel east of the project site is currently undeveloped and wetlands represent a constraint to development of that parcel.

### **Current Constraints to Growth**

Substantial new growth in the vicinity of the proposed project is constrained by lack of infrastructure, as public sewer and water supply are not currently available in the vicinity. Extension of Placer County Water Agency water service to the project site is planned to occur as early as the end of 2011. No extension of sewer service to the project site is currently planned. The current capacity of roadways in the project area represents another constraint to high intensity land uses in the project area, and roadway improvements would be required to accommodate increased traffic volumes prior to substantial additional development in the project area.

### **Removal of Growth Constraints**

*Population or Economic Growth* Approval and construction of the proposed concrete batch plant project would introduce a commercial land use to an area that carries a Commercial land use designation under the *Ophir General Plan*. Surrounding parcels are also designated for commercial and industrial land uses. The proposed project could include a residential component in the form of a single caretaker's residence constructed onsite, which would be consistent with allowable residential uses under the project site's land use and zoning designations. The commercial development would provide new job opportunities, prompting employees to either move or commute to the area or transfer from existing businesses within Placer County and the project area. The project is expected to employ a maximum of ten truck drivers, two full time employees, and one resident caretaker. Other uses allowable with a Minor Use Permit or Zoning Clearance under the project site's Commercial land use designation and Heavy Commercial zoning, such as offices and retail uses, would be expected to require a greater number of employees. It is therefore anticipated that the proposed project would not have a substantial effect on population growth beyond that anticipated in the General Plan and evaluated in the General Plan EIR. As the proposed project is consistent with the General Plan land use designation and the zoning designation and does not involve additional development in the community beyond that established in the plan, the project would not represent a substantial inducement to growth beyond that anticipated by the General Plan.

*Infrastructure Development* The project proposes to use an onsite well and onsite wastewater disposal system (for domestic waste) and would not extend water or sewer infrastructure to the project site. The onsite well and wastewater disposal system would be used exclusively by the proposed project and would not accommodate additional connections to serve subsequent development in the area. Therefore, the project would not induce growth by extension of

water/sewer infrastructure to the project site. The proposed batch plant would be required to connect to public water and sewer infrastructure at the time that such services are available to the project site. The project could contribute to the need for and implementation of these infrastructure extensions. However, the designation of the project site and surrounding parcels for commercial development indicates that future extension of public services to the area was anticipated by the General Plan.

To provide for safe ingress/egress and acceleration and deceleration for vehicles entering the facility, the project proposes improvements to Ophir Road. Improvements to Ophir Road include widening the paved roadway to meet County standards for one-half of an 80-foot right-of-way, providing a dedicated left-turn lane, and providing a Class II bike lane. The road improvements would be restricted to the project site frontage or areas adjacent to the frontage on Ophir Road. The road widening and provision of a bike lane are required to bring the roadway design to current County standards and not for the purpose of increasing roadway capacity. These improvements would not facilitate further development in the area and are not considered a substantial growth inducing impact of the proposed project. The provision of a dedicated left-turn lane would improve safety on Ophir Road by reducing the potential for left turn movement conflicts. This improvement would also be restricted to the project site frontage and areas adjacent to the frontage, and could support additional commercial development on the parcel north of the project site as well as on Geraldson Road. Again, based on the commercial designations of these properties, provision of this roadway improvement is not considered to induce-growth beyond that anticipated in the General Plan.

## **8.5 CUMULATIVE IMPACTS**

Cumulative impacts are those that are produced by the aggregation of individual environmental impacts resulting from a single project or from two or more projects in conjunction. Analysis of cumulative impacts is required under the CEQA Guidelines, §§15130 and 15355. The following is an excerpt from §15355 explaining cumulative impacts:

*Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

CEQA details two methods by which cumulative impacts may be evaluated. One of these is to summarize growth projections in an adopted general plan or in a prior certified environmental document. The second method involves the compilation of a list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts [Section 15130 (b)(1)(A) of the CEQA Guidelines].

This analysis is based on the buildout conditions of the *General Plan* and the analysis in the *General Plan EIR*. For the purposes of this EIR, the cumulative analysis considers growth anticipated in the region, as identified in adopted planning documents and proposals currently under consideration. Within the County, the cumulative analysis includes development and buildout under the existing General Plan through the year 2025. This EIR focuses on four

resource topics: Land Use (Chapter 4), Transportation and Circulation (Chapter 5), Hydrology and Water Quality (Chapter 6), and Noise (Chapter 7). Analysis of the proposed project's contributions to impacts pertinent to each resource topic is addressed in the respective resource chapter. The following discussions evaluate the project's contribution to cumulative impacts in each resource area.

### ***Land Use***

The proposed project is consistent with the General Plan land use and zoning designations for the project site. The analysis presented in **CHAPTER 4 LAND USE** found that since it is consistent with County designations for the site, impacts related to consistency with plans and policies, land use compatibility, and conversion of undeveloped land were less than significant. Because all approved projects must be consistent with the General Plan, it is not expected that significant impacts to land use would occur in the cumulative development scenario. The project proposes to develop a commercial use on approximately five acres in an area designated for commercial and industrial land uses. The project's contribution to cumulative impacts related to land is no greater than that anticipated in General Plan and evaluated in the General Plan EIR.

### ***Transportation and Circulation***

The proposed project, in conjunction with additional future development in the project area anticipated under the General Plan would result in a cumulative increase in traffic volumes. The peak hour traffic volume potentially generated by the project was added to future traffic volumes and the subsequent LOS was determined at the two existing intersections (Taylor Road/Ophir Road/I-80 Off Ramp and Ophir Road/Geraldson Road) and the proposed project site driveways (east entrance and west exit). The impact analysis for the cumulative scenario presented in **CHAPTER 5 TRANSPORTATION AND CIRCULATION** identified potentially significant traffic impacts in the future plus proposed project condition in 2025. Without the proposed project, the Taylor Road/Ophir Road/I-80 Off Ramp intersection is projected to carry 1803 vehicles in the AM peak hour and 2062 vehicles in the PM peak hour. This intersection is expected to operate at LOS F in the future with or without the proposed project during the PM peak hour. The proposed project is expected to add five AM peak hour trips and four PM peak hour trips to this intersection and would increase anticipated future delays by 0.30 seconds at this intersection during the PM peak hour. Since the proposed project may exacerbate future traffic conditions at a study location within one-half mile of direct access to a state highway that would already be functioning at an LOS below LOS E, the project is considered to have a considerable contribution to a potentially significant cumulative impact at this intersection. *Mitigation Measure 5.2a* would reduce this impact to a less than significant level with the implementation of either a traffic signal or a roundabout (see Chapter 5 for a discussion of potential traffic control options).

### ***Hydrology and Water Quality***

The proposed project and other development within the cumulative scenario would increase the level of urbanization within the Auburn Ravine watershed. Urban development generally increases the rate and volume of stormwater runoff by creating additional impervious ground surfaces, reducing time of concentration for water, and accelerating runoff from storm drainage facilities. Urban development can also increase erosion and sedimentation of waterways and can reduce water quality through the introduction of pollutants. Policies in the General Plan

and other County ordinances require new development to detain drainage onsite or contribute to regional drainage retention facilities. In addition, federal, state, and local regulations require that Best Management Practices be implemented as a means of urban runoff control and treatment so that urban pollutants are reduced prior to their entry into a water course. Implementation of laws, regulations, and policies aimed at protecting hydrology and water quality as buildout of the General Plan occurs is expected to reduce the potential significant cumulative impacts relating to hydrology and water quality. As discussed in **CHAPTER 6 HYDROLOGY AND WATER QUALITY**, the proposed project would retain all flows from the 10-year storm even, detain flows from the 100-year flood event, and implement substantial BMPs to protect water quality. With implementation of these measures, it is expected that the proposed project would make a less than considerable contribution to any cumulative impacts related to stormwater runoff and water quality. In addition, as discussed in Chapter 6, the proposed project use of groundwater is consistent with State recommendations for capacity of wells drilled in hard rock formations, and there is no evidence of lateral continuity between the onsite well and other existing wells in the vicinity. The project site does not currently support significant groundwater recharge. Therefore, the proposed use of groundwater is not expected to create a considerable contribution to any cumulative impacts related to groundwater supplies in the project vicinity or in the region.

### **Noise**

The proposed project would result in substantial noise generation during operation of the concrete batch plant as a result of truck traffic and machinery operating on the project site. The results of the acoustic analysis prepared for the proposed project, which is summarized in **CHAPTER 8 NOISE**, determined that although operations associated with the proposed project would result in substantial noise generation, the project would not contribute to an increase in noise levels at sensitive receptors in the project area, partially due to the high background noise levels in the project area created by traffic-generated noise from Interstate 80 and partially due to the distance between the project site and the sensitive receptors. By increasing the noise generation in the project area, the project would make a considerable contribution to the cumulative noise impacts in the project area. However, the project is consistent with the General Plan and zoning designations for the project site, thus the project's contribution to the cumulative noise impacts is consistent with the noise impacts anticipated under the County's General Plan and no additional mitigation is necessary.

## **8.6 ALTERNATIVES**

Pursuant to CEQA Guidelines §15126.6(a), an EIR shall describe "a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The evaluation of alternatives shall explain why the proposed project was selected over other development scenarios, including the "no project" alternative and alternatives that would eliminate or reduce significant adverse environmental impacts. Less detailed discussion may occur where an alternative causes one or more significant impacts in addition to those described for the proposed project. In addition, this section will identify the "environmentally superior alternative" (CEQA).

The range of alternatives is limited by the “rule of reason,” and the EIR should discuss the rationale for selecting the alternatives to be evaluated. The “rule of reason” is described in CEQA Guidelines §15126.6(f):

*Rule of reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.*

In accordance with these guidelines, this discussion will not include consideration of alternatives determined to be remote or speculative, that would not avoid or lessen significant impacts, or that could not attain the basic objectives of the proposed project.

Pursuant to Placer County Code Environmental Review Ordinance 18.20.030.D, an evaluation of the comparative merits of each alternative that has been selected is provided.

### **Selection of Alternatives**

As required in CEQA Guidelines §15126.6, project alternatives selected for analysis are those alternatives capable of eliminating or reducing to a level of insignificance one or more of the significant adverse environmental effects of the project as proposed. Alternatives were selected based on feasibility and ability to meet basic project objectives, however, no project alternatives were rejected based on the likelihood that they would slightly impede the attainment of the project objectives or result in higher costs than the proposed project.

### **Objectives of the Proposed Project**

The proposed project includes construction and operation of a concrete batch plant, including an office building, truck wash area, and vehicle parking area on an approximately five-acre parcel. The project may also include a caretaker’s apartment. Project objectives of the proposed Livingston Concrete Batch Plant facility are as follows:

1. Provide a batch plant facility with a daily production capacity of 300 cubic yards per day.
2. Establish the facility in a location that allows Livingston's to serve projects in the general Auburn area using as little vehicle fuel and creating as little vehicle pollution as possible.
3. Operate in a location that allows Livingston's to serve projects in the general Auburn area while resulting in the least amount of impacts on local transportation systems.
4. Operate in a location that allows Livingston's to serve projects in the general Auburn area within the narrow timeframe (90 minutes) allowed for delivery of their product in its optimum form.

5. Operate in a location that allows Livingston's to serve projects in the general Auburn area with the lowest costs to builders, contractors, and the community as possible.

Alternatives included in this analysis were selected partly based on their ability to meet the basic intent of these objectives.

### **Impacts of the Proposed Project**

The goal of the CEQA alternatives analysis is to identify project alternatives that may reduce or prevent any Significant and Unavoidable impacts. For this project, no Significant and Unavoidable impacts were identified. Therefore, this analysis addresses the effect of each alternative on the impacts that were determined to be less than significant with mitigation incorporated. CHAPTERS 4 through 7 of this EIR evaluate the types and significance of environmental impacts that are expected to result from implementation of the proposed project. The analysis in this EIR finds that impacts to Land Use, Transportation and Circulation, and Hydrology and Water Quality would be Less than Significant with mitigation, and finds that impacts to Noise would be Less than Significant and no mitigation is required. Table 2.2 of CHAPTER 2 EXECUTIVE SUMMARY identifies each impact evaluated in this EIR, the level of significance of the impact, any proposed or recommended mitigation measures, and the level of significance that would remain after the mitigation measures are implemented.

### **Alternatives Considered and Eliminated from Further Consideration**

Several potential alternatives were considered during preparation of this analysis, including considering alternative locations for the proposed project. Because placing the project in an alternative location would likely have similar physical impacts as at the proposed project site, relocating the proposed project was considered to be beneficial if the alternative location could provide public water and sewage treatment services, since those services are not currently available at the proposed site.

A review of land use designations for vacant lands in western Placer County was conducted to evaluate the potential for locating the proposed project offsite. Vacant parcels were selected as potential offsite locations if they carried either an industrial or heavy commercial general plan designation, if public water and sewage treatment services were available to the project site, and if the parcel was approximately the same size as the proposed site. The proposed site is approximately 4.9 acres; potential alternative locations were considered feasible if they were in the range of four to nine acres. Several parcels were identified that met those conditions. These included some located near I-80, northeast of the proposed project site; some located near the Auburn Municipal Airport, accessed from Old Airport Road; and several along State Route 49 (SR 49). Windshield surveys were conducted to identify if physical conditions at each parcel would support the proposed project. After this preliminary analysis, consideration of an offsite alternative was rejected from further investigation.

Of the parcels that met the three conditions identified above, only one had adequate access to I-80, via the Bowman on and off ramps. The physical characteristics of this site represented significant constraints to development. Specifically, the topography of the site appeared to require significant fill areas in proximity to a nearby drainage feature; the site was adjacent to existing rural residential land uses that could be exposed to significant noise and air quality

impacts from the project; and the site is more prominently visible from I-80, which could result in greater aesthetic impacts.

The parcels located near the Auburn Municipal Airport had inadequate access – both in terms of the road condition accessing the project site and in relation to the distance from I-80 and from SR 49. The parcels near SR 49 would also provide poor freeway/highway access since many would require left turns across SR 49. Some of these parcels had other physical conditions that represented greater constraints to development than those present at the proposed project site, such as topography and the presence of biological resources (trees).

### **Alternatives Selected for Analysis**

#### ***Alternative A – No Project / No Build Alternative***

Alternative A assumes that the proposed project would not be constructed on the five-acre project site, and that no offsite road or drainage improvements associated with the proposed project would be implemented. The site would maintain its Commercial land use designation and Heavy Commercial Zoning, but development of the site would not occur as a result of the currently proposed project. This alternative assumes that the project site would remain undeveloped and that no subsequent development would be pursued on the project site, although land use and zoning designations for the project site would remain unchanged.

This alternative would in no way preclude other development proposals consistent with the site's adopted land use and zoning designations, and development of the site consistent with the adopted land use plan could reasonably be expected in the future. Analysis of development on the site other than the proposed project is provided by Alternative B, below.

#### ***Alternative B – No Project / Other Development Alternative***

Alternative B assumes that the proposed project would not be constructed on the five-acre project site, but that another project consistent with the adopted General Plan policies and land use designations would be implemented on the site instead. This alternative assumes that a ±85,378 square-foot mini-storage facility would be constructed on the site. Onsite sewage disposal and water supply would be necessary for the site's employees. Vehicular access to the site would be similar to the proposed project and the Floor Area Ratio would be 40%.

#### ***Alternative C – Reduced Scale Alternative***

Alternative C assumes a reduced scale for the proposed project. Under this alternative, the capacity of the concrete batch plant would be reduced from the proposed 300 yards of concrete daily, six days per week, to 240 yards daily, five days per week. This would reduce the daily volume by 20%, and the weekly volume by 33%. Under this alternative, some components of the project would be slightly reduced in size (parking and storage) but no change to the height of the tower would occur.

### **Alternatives Analysis**

As stated above, this analysis focuses on the ability of each alternative to reduce significant impacts of the proposed project under the topics of Land Use, Transportation and Circulation, and Hydrology and Water Quality. This analysis also identifies if the alternative could result in increased impacts in other resource areas. CEQA requires that an EIR identify alternatives to

the proposed project that are capable of avoiding significant adverse effects of the project. This analysis compares each alternative to the project with respect to the impacts determined to be less than significant with mitigation incorporated in order to determine which alternative is the “Environmentally Superior Alternative” under CEQA. As stated above, the proposed project is not expected to result in any Significant and Unavoidable impacts.

Table 8.1 provides a summary of the comparison of the significance of impacts resulting from the proposed project and the significance of impacts that would result from implementation of the identified alternatives for each resource topic included in the EIR.

### **Alternative A – No Project / No Build Alternative**

Under the No Build Alternative, the project site would remain vacant.

#### ***Land Use***

This alternative would result in no impacts to land use. The proposed use of the onsite well and an onsite septic system would not occur, and the short-term policy inconsistency impact would not occur. Because this alternative would avoid this impact, the No Project/No Build Alternative is preferred over the proposed project.

#### ***Transportation and Circulation***

This alternative would result in no increase in traffic volumes through the project vicinity. While the improvements to the Taylor Road/Ophir Road/I-80 Off Ramp intersection would still be needed in the future, there would be no contribution to the need for these improvements generated by the project site, thus the “fair share” contribution of costs towards the improvements would not be made. This alternative would result in no change over existing and anticipated future conditions in the project area. The proposed project would change the existing and anticipated future conditions, but the project’s impacts would be mitigated to a less than significant level. Additionally, by providing a bike lane along a portion of Ophir Road, the proposed project would provide a slight improvement in conditions for bicyclists in the project area. This improvement would not occur with the No Project/No Build Alternative. Therefore, the proposed project is preferred over Alternative A.

#### ***Hydrology and Water Quality***

This alternative would result in no changes to the existing hydrology of the project site. No new impervious surfaces would be created and the onsite groundwater well would not be used. No impacts to hydrology and water quality would occur and no mitigation measures would be implemented. Alternative A is preferred over the proposed project.

#### ***Noise***

The proposed project would increase noise levels in the project vicinity but the impacts would be less than significant impacts and no mitigation measures are required. The No Project/No Build Alternative would not create any change in noise levels in the project vicinity. Because the proposed project does not require any noise mitigation, there is no preference between the proposed project and Alternative A.

### ***Impacts Identified in the Initial Study***

The No Build alternative would avoid all impacts and the need for all mitigation measures related to geologic conditions, stormwater drainage, air quality, biological resources, hazards, and cultural resources. Therefore Alternative A is preferred over the proposed project.

### **Alternative B – No Project / Other Development Alternative**

Under the No Project/Other Development Alternative, the project site would be largely disturbed with grading, paving, and landscaping. The “other development” being evaluated for this site is a mini-storage facility. This would not require a height variance, but water and sewage treatment would be necessary for onsite employees. Therefore, this alternative is assumed to include use of the onsite well and the proposed onsite septic system and could also include a caretaker apartment.

### ***Land Use***

Because this alternative would still require use of the onsite well and the proposed onsite septic system, there would be no change in the land use impacts and mitigation measures. Therefore there is no preference between the proposed project and the No Project/Other Development Alternative.

### ***Transportation and Circulation***

As shown in *Table 8* of the *Traffic Impacts Analysis* in Appendix C of this Draft EIR, the “mini-storage” land use is anticipated to generate 9 fewer trips during the AM peak hour and 16 additional trips during the PM peak hour when compared to the proposed project. The proposed project was found to result in less than significant impacts not requiring mitigation for the AM peak hour, and was found to contribute to a significant impact requiring mitigation for the PM peak hour under the cumulative scenario. Alternative B would have a slightly greater contribution to the cumulative impact due to the increase in PM peak hour trips. A mini-storage development at the project site as evaluated for this alternative would be required to make a greater contribution towards the cost of improving the Taylor Road/Ophir Road/I-80 Off Ramp intersection. It is expected that the frontage improvements to Ophir Road required of the proposed project would also be required of this alternative. Because the impacts and mitigation measures (other than the amount of the fair share contribution) would not change, there is no preference between Alternative B and the proposed project.

### ***Hydrology and Water Quality***

This alternative would result in a similar amount of paving as the proposed project. Urban water pollutants from motor vehicles could enter the regional drainage system from operation of a mini-storage facility. However, the alternative would use less groundwater than the proposed project and would not require treatment and possible discharge of process water. Additionally, this alternative would reduce the amount of hazardous materials stored and used onsite. These factors would reduce the impacts to hydrology and water quality under Alternative B. However implementation of the same or similar mitigation measures would be necessary. Because Alternative B would slightly reduce impacts compared to the proposed project, Alternative B is preferred over the proposed project.

### **Noise**

The proposed project would increase noise levels in the project vicinity but the impacts would be less than significant impacts and no mitigation measures are required. The No Project/Other Development Alternative would slightly increase noise levels in the project vicinity due to vehicle traffic, but would not generate noise levels similar to those related to operation of the batch plant. It is expected that impacts of this alternative would also remain less than significant and no mitigation would be necessary. Because the proposed project does not require any noise mitigation for operational activities, there is no preference between the proposed project and Alternative B. Both the proposed project and Alternative B would be subject to the requirements of Placer County Minute Order 90-08, as expressed in *Mitigation Measure 7.3a*.

### **Impacts Identified in the Initial Study**

The Other Development alternative would result in similar potential for impacts and would require implementation of the same mitigation measures as the proposed project in the resource areas of geologic conditions, stormwater drainage, air quality, biological resources, hazards, and cultural resources. There is no preference between the proposed project and Alternative B.

### **Alternative C – Reduced Scale Alternative**

Under this alternative, the capacity of the concrete batch plant would be reduced from the proposed 300 yards of concrete daily, six days per week, to 240 yards daily, five days per week. This would reduce the daily volume by 20%, and the weekly volume by 33%.

### **Land Use**

Under this alternative, some components of the project would be slightly reduced in size (parking and storage) but no change to the height of the tower would occur. This alternative would still require use of the onsite well and the proposed onsite septic system. There would be no change in the land use impacts and mitigation measures. Therefore there is no preference between the proposed project and the Reduced Scale Alternative.

### **Transportation and Circulation**

As stated in the *Traffic Impacts Analysis*, the reduced capacity of the batch plant is expected to result in slightly fewer daily trips than the proposed project. This alternative would reduce the project's contribution to the future LOS impact to the Taylor Road/Ophir Road/I-80 offramp intersection, however the alternative would still be required to contribute a fair share amount to the cost of construction of the required improvements. Because the mitigation would still be required, there is no preference between the proposed project and the Reduced Scale Alternative.

### **Hydrology and Water Quality**

This alternative would result in a similar amount of paving and similar impacts to hydrology and water quality as the proposed project. The potential for the project to negatively impact water quality and groundwater supplies may be slightly reduced as a result of the reduction in overall production at the batch plant and corresponding reduction in water usage, as well as a possible reduction in the storage and use of hazardous materials onsite. Implementation of the

same mitigation measures would be necessary. Therefore there is no preference between Alternative C and the proposed project.

### **Noise**

Under this alternative, the maximum noise levels generated by the project would not change, although the batch plant would emit those maximum levels for less time each day. However, because the proposed project does not require any noise mitigation, there is no preference between the proposed project and Alternative C.

### **Impacts Identified in the Initial Study**

The Reduced Scale alternative would result in similar potential for most impacts identified in the Initial Study. Impacts to air quality are expected to be reduced under this alternative. The Reduced Scale alternative would require implementation of the same mitigation measures as the proposed project in the resource areas of geologic conditions, stormwater drainage, air quality, biological resources, hazards, and cultural resources. There is no preference between the proposed project and Alternative C.

### **Environmentally Superior Alternative**

As shown in *Table 8.1*, each of the three project alternatives evaluated result in less impact overall compared to the significant impacts of the proposed project. Since the No Project/No Build and the No Project/Other Development alternatives do not meet any of the objectives of the project, these alternatives would not be considered a feasible environmentally superior alternative. The Reduced Scale Alternative is anticipated to produce less impact with regard to the resource areas of traffic, noise, and air quality. Alternative C is the Environmentally Superior Alternative.

**Table 8.1**  
**Summary of Alternatives Analysis**

<b>Resource Area</b>	<b>Proposed Project</b>	<b>No Project/No Build (Alternative A)</b>	<b>No Project/Other Development (Alternative B)</b>	<b>Reduced Scale Development (Alternative C)</b>
<b>Land Use</b>	Potentially Significant, Mitigation Required	Impacts Avoided, No Mitigation Required	No Change	No Change
<b>Transportation and Circulation</b>	Potentially Significant, Mitigation Required	Impacts Avoided, No Mitigation Required; No Improvement to Ophir Road; therefore beneficial impact of project not realized	Impacts Increased, Mitigation Required	Impacts Reduced, Mitigation Required
<b>Hydrology and Water Quality</b>	Potentially Significant, Mitigation Required	Impacts Avoided, No Mitigation Required	Lesser Impacts	No Change
<b>Noise</b>	Less than Significant, No Mitigation Required	Impacts Avoided	Lesser Impacts	Lesser Impacts
<b>Impacts Identified In the Initial Study</b>	Potentially Significant, Mitigation Required	Impacts Avoided, No Mitigation Required	No Change	Reduced Air Quality Impacts, No Change to Other Impacts, Mitigation Required

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