15.0 OTHER DISCUSSIONS REQUIRED BY CEQA

15.1 Alternatives

As stated in the CEQA Guidelines Section 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. Project alternatives were not rejected based on their likelihood to slightly impede the attainment of the project objectives or their likelihood to be more costly than the proposed project.

15.1.1 Alternatives to the Proposed Project

One modified project alternative and the no project alternative are under consideration and have been included in the following discussion

15.1.1.1 No Project Alternative

CEQA Guidelines Section 15126.6(e) requires every EIR to include a "No Project Alternative." "The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare impacts of approving the proposed project with the impacts of not approving the proposed project. The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

"If the project is . . . a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the No Project Alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical results of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment."

15.1.1.2 Reduced Trails Alternative

This alternative is similar to the proposed project with the exception that four sections of "Habitat with Potential Recreation" corridors in the proposed project would change to "Habitat Only" corridors. Under this alternative, the following corridors would change from "Habitat with Potential Recreation" corridors to "Habitat Only":

- Clover Valley Creek, from approximately North Clover Valley Road upstream to English Colony Way.
- Miners Ravine (small section east of Sierra Collage Boulevard before larger Habitat only section).

- Strap Ravine, from Sierra Collage Boulevard east to Granite Bay Community Park (near the intersection of Barton Road and Douglas Boulevard).
- Swan Stream, from Roseville Parkway to Pastor Drive.

The change in these corridors is shown in Figure 15-1.

15.1.2 Ability to Meet Project Objectives

The Reduced Trails Alternative would meet all of the project objectives listed in Section 3.5 of this EIR.

- This alternative would preserve and enhance riparian and aquatic habitats.
- This alternative would conserve and protect significant historic, cultural and scenic resources.
- This alternative would assist in connecting the Dry Creek Parkway to the Folsom Lake State Recreation Area, although connectivity options would be reduced, primarily by changing the corridor along Strap Ravine to “Habitat Only”.
- This alternative would provide for the management of Greenway resources.
- This alternative would provide active and passive recreation opportunities.
- This alternative would preserve floodwater conveyance capacity and reduce property damage due to flooding.
- This alternative would work with existing plans and policies.
- This alternative would assist in securing funding to sustain and complete the Greenway.
- This alternative would allow the Greenway to function as a local and regional asset.
- This alternative would facilitate land use planning and management within the Greenway.

The No Project Alternative would not meet many of the project objectives described in Section 3.5 of this EIR.

- This alternative would not comprehensively preserve and enhance riparian and aquatic habitats.
- This alternative would not conserve and protect significant historic, cultural and scenic resources.
- This alternative would not assist in connecting the Dry Creek Parkway to the Folsom Lake State Recreation Area.
- This alternative would not provide for the management of Greenway resources.
- This alternative would not provide the desired level of active and passive recreation opportunities.
- This alternative would not preserve floodwater conveyance capacity and reduce property damage due to flooding.

- This alternative would not secure funding to sustain and complete the Greenway.
- This alternative would not create a Greenway that would function as a local and regional asset.
- This alternative would not facilitate land use planning and management within the Greenway.

15.1.3 Compare Environmental Superiority

The proposed project includes recreational facilities including trails, nodes, and associated amenities. The proposed project also includes designation of stream corridors as "Recreation Use", "Habitat with Potential Recreation Use", and "Habitat Only". Vision Statements and Implementation Strategies contained in the Greenway Vision are meant to guide planning and serve as a reference for Placer County (and other jurisdictions within the County as desired) to utilize for policy language and project suggestions. Beneficial impacts to biological, cultural, and recreational resources may occur to the extent that the implementation strategies are utilized, funded, and implemented on specific projects and/or comprehensively throughout the proposed project areas. Adverse impacts expected by implementation of the proposed project are discussed in detail in Chapters 4 through 14 of this EIR and are summarized in Table 15-1. All impacts created by the proposed project are reduced to a level less than significant by mitigation.

As stated in Section 15.1 above, alternatives are analyzed for their capability of eliminating or reducing to a level of insignificance, one or more of the significant adverse environmental effects of the project as proposed. CEQA Section 15126.6 (e)(3)(C) requires that the lead agency analyze the impact of a no project alternative by projecting what would reasonably be expected to occur in the foreseeable future in the project were not approved. Environmental impacts of the No-Project Alternative are difficult to predict as the multiple land use and zoning designations allow for an array of future development with unknown impacts. Some features of the proposed project are proposed within existing open space areas where development is restricted, while some are proposed within residential or other land use and zoning designations where more intensive development is allowed. Therefore, it cannot be determined with certainty that the No-Project Alternative is capable of eliminating or reducing one or more of the adverse environmental effect of the proposed project.

The Reduced Trails Alternative changes four "Habitat with Potential Recreation" corridors to "Habitat Only" corridors. This reduction of more active uses (i.e. no trails) would lessen the impacts to biological resources, geology/soils, and water quality as compared to the "Proposed Project". Therefore, the Reduced Trails Alternative is considered to be the environmentally superior alternative. Table 15-1 provides a comparison of the Reduced Trails Alternative to the proposed project in addition to the No Project Alternative.

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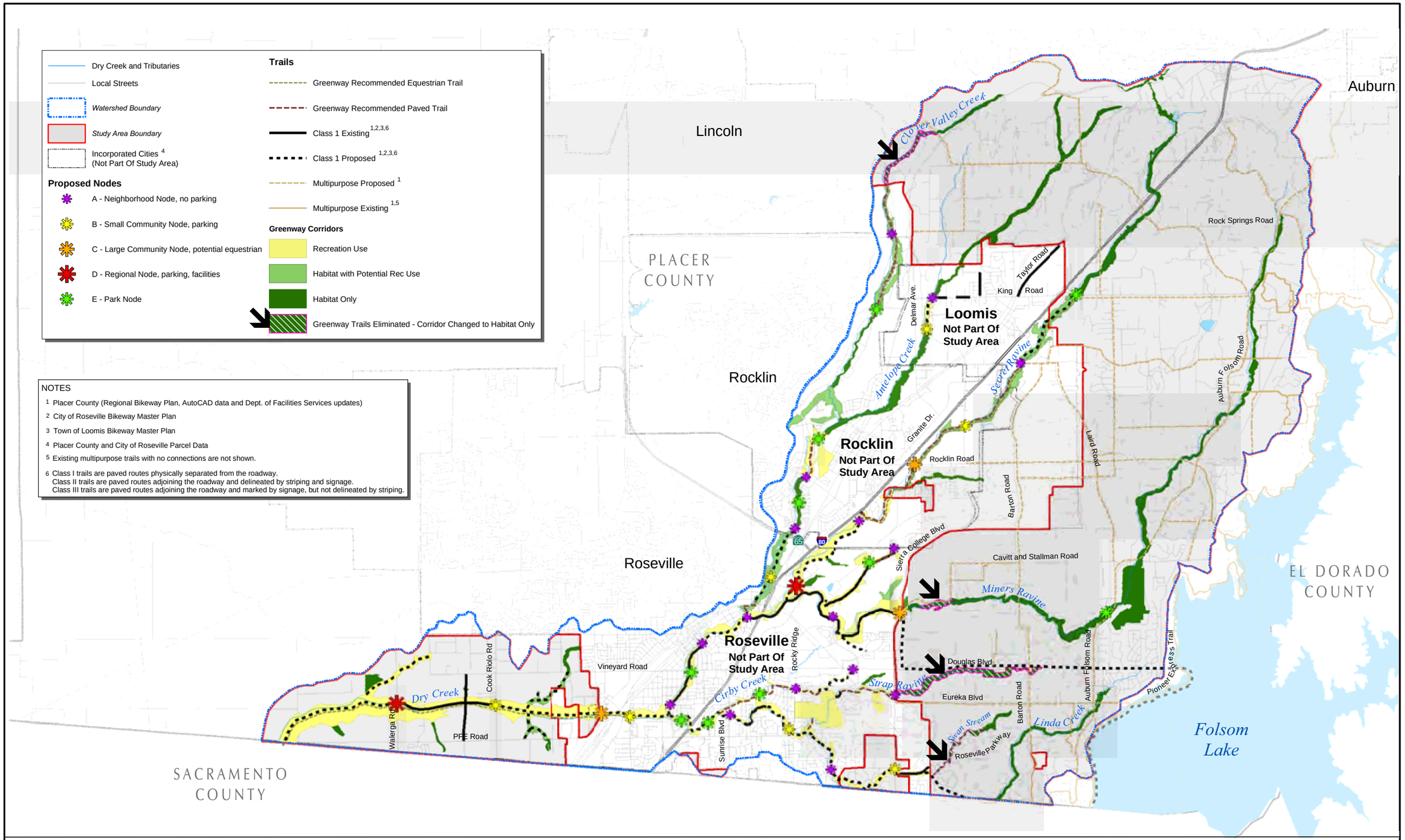

GREENWAY CORRIDORS, TRAILS, AND NODES - REDUCED TRAILS ALTERNATIVE

FOOTHILL ASSOCIATES
ENVIRONMENTAL CONSULTING • PLANNING • LANDSCAPE ARCHITECTURE

N

DRY CREEK GREENWAY REGIONAL VISION

0 0.5 1 2 3
SCALE IN MILES

FIGURE 15-1

15-1_Nodes_Reduced_Trails_Alt.mxd

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Table 15-1 – Alternatives Analysis

Proposed Project	Reduced Trails Alternative	No Project Alternative
Land Use		
The proposed project would not have significant impacts to land use as the Greenway Vision is tailored to be consistent with existing community environmental plans and goals. Rezoning or changes in land use designations would not be expected. No mitigation measures are required.	The Reduced Trails Alternative would change four "Habitat with Potential Recreation" corridors to "Habitat Only" corridors. As with the Proposed Project, rezoning or changes in land use designations would not be expected. No land use impacts are anticipated and no mitigation measures would be required.	Under the No Project Alternative, the Greenway facilities would not be implemented. All current land use designations and zoning would remain unchanged. However, the No Project Alternative could result in a significant impact to Land Use by not implementing Placer County General Plan Policy 1.L.7 which states that the County shall encourage the use of bicycles as an alternative mode of travel for recreational purposes in scenic corridors.
Biological Resources		
Although the exact location of potential Greenway trails will not be determined until individual projects are implemented, the location of Greenway trails along stream corridors has the potential to impact listed species, oak trees, riparian habitat, and wetlands. Construction of Greenway trails and amenities could result in removal of oak trees, loss of riparian habitat and wetlands, and impacts to listed species. Pre-construction surveys and wetland delineations will be utilized to relocate project features when feasible to avoid and minimize impacts. Specific projects in Greenway corridors designated as "Habitat Only" have not yet been identified. However, the Greenway Vision statements and potential implementation strategies listed in the Vision include habitat improvements and education and stewardship components that could potentially be beneficial to biological resources within the Greenway. Multiple mitigation measures are proposed to reduce adverse impacts to a less than significant level.	The Reduced Trails Alternative has similar potential impacts to biological resources, but due to the reduced number of trails and increase in "Habitat Only" corridors, impacts would occur in fewer locations. Mitigation measures would reduce impacts to a less than significant level.	Under the No Project Alternative, adverse impacts to biological resources from construction of trails and associated facilities would not occur. Potential benefits from any habitat improvements and from the education and stewardship components of the Greenway Vision would not occur. Depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and the impacts to biological resources cannot be determined at this time.

Proposed Project	Reduced Trails Alternative	No Project Alternative
Cultural Resources		
A potentially significant impact could occur if previously undiscovered cultural resources are inadvertently exposed during grading activities. The project may also cause a substantial adverse change in the significance of a historical resource (e.g., impacts to inadvertently discovered historical resources). Impacts may also occur to inadvertently exposed paleontological resources during construction. The implementation of mitigation measures would reduce impacts to below a level of significance.	Although trail construction would occur over a reduced area, impacts would be similar to the proposed project. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, potentially significant impacts to cultural, historical, and/or paleontological resources could occur depending upon the extent and specifics of allowed development under existing land use and zoning designations. The exact extent of impacts cannot be determined at this time.
Visual Resources		
Determination of exact trail locations will be determined with multiple constraints considered. Setbacks from riparian areas, public safety, private property, avoidance of waters and wetlands, avoidance of special status plant or wildlife populations or their habitat, grading impacts, tree preservation, and aesthetics must all be considered. To accomplish these sometimes conflicting goals, trail locations may require vegetation removal, including trees subject to mitigation requirements under the Placer County Tree Ordinance, which may create potentially significant impacts to the existing visual character and quality of the site. In addition, the construction of node/connection facilities, including parking lots and rest rooms, may have a significant impact on visual resources. Mitigation is proposed to reduce this impact to less than significant.	Under the Reduced Trails Alternative, impacts would be similar to the proposed project, although potentially occurring in fewer locations. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, adverse impacts to visual resources from construction of trails and associated facilities would not occur. Depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and the impacts to visual resources cannot be determined at this time.
Transportation and Circulation		
Operation of the proposed project is not expected to create significant impacts to transportation and circulation. However, construction of the proposed trails and facilities could be potentially significant. The implementation of mitigation measures would reduce impacts to below a level of significance.	Impacts occurring under the Reduce Trails Alternative would be similar to the proposed project. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, construction related impacts to transportation and circulation created by the proposed project would not occur. However, depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and construction

Proposed Project	Reduced Trails Alternative	No Project Alternative
		and operational impacts to transportation cannot be determined at this time.
Air Quality		
Construction activities associated with the development of the proposed project would generate an increase in criteria pollutants and particulate matter from grading and earthmoving activities (i.e. dust generation). Diesel fumes associated with the operation of construction equipment would contribute to the release of NOx and ROGs. The implementation of mitigation measures would reduce impacts to below a level of significance.	As trail construction would occur over a reduced area, impacts, though potentially significant, would be less than the proposed project. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, construction related impacts to air quality created by the proposed project would not occur. However, depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and construction and operational impacts to air quality cannot be determined at this time.
Noise		
Construction activities may result in short-term noise levels that exceed the thresholds established in the Placer County General Plan. However, construction-related noise impacts that exceed adopted noise level standards are exempt, provided they do not occur outside of specified operating hours. Construction noise exceeding adopted standards and occurring outside of the hours specified in Placer County's standard noise condition of approval would be considered a significant noise impact. Mitigation measures would reduce this impact to below a level of significance.	Short-term construction noise impacts would be similar to those of the proposed project. Construction noise exceeding adopted standards and occurring outside of the hours specified in Placer County's standard noise condition of approval would be considered a significant noise impact. Mitigation measures would reduce this impact to below a level of significance.	Under the No Project Alternative, construction related impacts to noise created by the proposed project would not occur. However, depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and the level of construction and operational noise impacts cannot be determined at this time.
Soils, Geology, and Seismicity		
Topographic alteration resulting from grading activities, such as those anticipated during trail and node construction, may create the potential for ground instability and erosion. The implementation of mitigation measures would reduce impacts to below a level of significance.	Although trail construction would occur over a reduced area, impacts would be similar to the proposed project. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, construction related impacts from topographic alteration created by the proposed project would not occur. However, depending upon the current land use and zoning designation of existing parcels, some allowed development could occur and the level of impacts cannot be determined at this time.

Proposed Project	Reduced Trails Alternative	No Project Alternative
Hydrology & Water Quality		
Development of the proposed project would increase the amount of impervious surfaces through the construction of trails and parking areas, which would increase the rate and volume of storm water runoff. Storm water runoff from the proposed project could potentially contain urban contaminants that could degrade water quality. Grading, excavation, and construction activities associated with the proposed project could potentially degrade water quality and increase deposition of sediment in area creeks and streams. The implementation of mitigation measures would reduce impacts to below a level of significance.	Although trail construction would occur over a reduced area as compared to the proposed project, impacts would be similar. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, the addition of impervious surfaces created by the proposed project would not occur. However, depending upon the current land use and zoning designation of existing parcels, some allowed development could occur that could potentially result in an increase in impervious surfaces and associated storm water impacts. Construction activities associated with such development could also create impacts to water quality. The level of impacts cannot be determined at this time.
Public Services and Utilities		
Development of the proposed project is not expected to have significant impacts on public services and utilities. Increased demand for Fire and Sheriff's protection services, solid waste collection, and electric supply are expected to be less than significant. No adverse impacts to recreation would occur due to the implementation of the proposed project. No mitigation measures are required.	Under the Reduced Trails Alternative, impacts would be similar to the proposed project. No mitigation would be required.	Under the No Project Alternative, some development could occur depending upon the current land use and zoning designations of existing parcels. The level of impact to public services and utilities cannot be determined at this time.
Hazards & Hazardous Materials		
Development of the proposed project is not expected to result in significant impacts from hazards or hazardous materials. No mitigation measures are required.	As with the Proposed Project, the Reduced Trails Alternative is not expected to result in significant impacts from hazards or hazardous materials. No mitigation would be required.	Under the No Project Alternative, some development could occur depending upon the current land use and zoning designations of existing parcels. Impacts from hazards and/or hazardous materials cannot be determined at this time.
Cumulative Impacts		
The proposed project is designed to be developed and used in a manner consistent with the existing goals and policies of the Placer County General Plan, as well as the relevant goals and policies of the community plan areas in which the project is	The cumulative impacts under the Reduced Trails Alternative are similar to the proposed project. The implementation of mitigation measures would reduce impacts to below a level of significance.	Under the No Project Alternative, development would occur as projected in the Placer County General Plan and the associated community plans. Cumulative impacts were addressed in the relevant EIRs for those plans. No additional cumulative

Proposed Project	Reduced Trails Alternative	No Project Alternative
located. Implementation of the Greenway Vision would result in temporary construction impacts that are mitigated to less than significant at this program level evaluation and are not considered to result in cumulative impacts. With incorporation of mitigation measures, including standard development policies related to grading, flood control, and habitat protection, cumulative impacts are considered to be less than significant.		impacts would be expected under the No Project Alternative.

15.2 Effects Found not to be Significant

15.2.1 Population and Housing

CEQA considers impacts to population and housing to be significant if the project would cumulatively exceed official regional or local population projections, induce substantial growth in an area either directly or indirectly, or displace existing housing, especially affordable housing. The Initial Study for the project indicated that the project has a less than significant impact on population and housing as the adoption of the Greenway Vision has no affect on population projections, does not induce substantial growth either directly or indirectly, nor displace existing housing.

15.2.2 Energy Resources

CEQA considers impacts to energy resources to be significant if the project would conflict with adopted energy conservation plans or use non-renewable resources in a wasteful and inefficient manner. The Initial Study for the project indicated that the project has a less than significant impact on energy resources as it does not conflict with any energy conservation plans nor is it expected to use non-renewable resources in a wasteful and inefficient manner.

15.3 Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented

Adoption and implementation of the proposed project would not result in significant unavoidable environmental effects. Mitigation measures will be implemented to avoid or reduce significant environmental effects to below a level of significance as outlined in Chapters **4.0** through **14.0**.

15.4 Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented

There are no expected significant irreversible environmental changes that will occur as a result of the implementation of the proposed project. The adoption and implementation of the Dry Creek Greenway Regional Vision would commit small amounts of additional land to the recreational trail and non-motorized transportation networks of Placer County. Narrow strips of undeveloped land primarily within designated open space areas would be converted to paved and unpaved trails.

15.5 Any Irreversible or Irretrievable Commitments of Resources that would be Involved in the Proposed Project if Implemented

Adoption and implementation of the Dry Creek Greenway Regional Vision would result in an irretrievable commitment of nonrenewable resources such as energy supplies and other construction-related resources. These energy resource demands would be used for construction and transportation of people and supplies to and from the future project sites. However, this use of energy is minor and temporary in nature, and therefore, is not considered to be significant.

15.6 Growth-Inducing Impact of the Proposed Project

Planning and encouragement for an integrated network of recreational and non-motorized transportation trails have long been a part of various adopted plans within Placer County. These include the Placer County General Plan, the Dry Creek-West Placer Community Plan, the Granite Bay Community Plan, the Horseshoe Bar/Penryn Community Plan, the Placer County Regional Bikeway Plan, and the Placer County Regional Transportation Plan 2027. Conceptual alignments of some of the Greenway Vision trails are identified in the Regional Bikeway Plan. The Regional Transportation Plan includes a policy to "support pedestrian/equestrian paths and bicycle trails within open spaces adjacent to creeks, canals, and major traffic corridors" (Placer County Transportation Planning Agency 2005) and includes the Dry Creek Greenway Vision in its discussion on non-motorized transportation.

The Greenway Vision would not directly or indirectly affect growth within Placer County. Planning for both recreational and transportation related trails and bikeways has long been an integral component of multiple local, County, and regional planning efforts. Designation of portions of the Greenway as "Habitat Only" corridors will prohibit trail development within certain corridors. For these reasons, the adoption and implementation of the Dry Creek Greenway Regional Vision would not result in a growth inducing impact.

15.7 Cumulative Impacts

CEQA requires that an EIR contain an assessment of the cumulative impacts which may be associated with a proposed project. This assessment involves examining project-related effects on the environment in the context of similar effects which have been caused by past or existing projects, as well as the anticipated effects of foreseeable future projects. Although project-related impacts may be individually minor, the cumulative effects of these impacts, in combination with the impacts of other projects, may be significant under CEQA and must be addressed.

15.7.1 Assumptions Considered in Cumulative Impact Analysis

For the purposes of this analysis, the assessment of cumulative impacts is based on the 1994 Placer County General Plan EIR as well as the Dry Creek-West Placer, Granite Bay, and Horseshoe Bar/Penryn Community Plan EIRs. The Placer County General Plan and EIR were certified and adopted in 1994, the Dry Creek-West Placer Community Plan and EIR in 1990, the Granite Bay Community Plan and EIR in 1989 (amended in 1996), and the Horseshoe Bar/Penryn Community Plan and EIR in 1994.

These EIRs assessed cumulative impacts based on an analysis of the adopted general and community plans for jurisdictions within and adjacent to Placer County (e.g., Roseville, Rocklin, Loomis, etc.). The assessment of cumulative impacts set forth in the County General Plan EIR and community plan EIRs sets the context and framework for the evaluation of cumulative impacts associated with the proposed implementation of the Dry Creek Greenway Vision.

15.7.2 Assessment of Cumulative Impacts

As determined by the aforementioned documents, current and future development within the community plan areas as well as surrounding areas would result in cumulative impacts that

would be significant. However, implementation of the Greenway Vision would result in temporary construction impacts that are mitigated to less than significant at this program level evaluation and are not considered to result in cumulative impacts. As described below, construction and operational impacts would not be expected to be cumulatively significant or cumulatively considerable.

Biological Resources

The proposed project design guidelines and mitigation measures discussed in Chapter 5.0 reduce impacts to less than significant. General Plan and community plan policies require a "non-development" buffer zone of 100 feet from the centerline of perennial streams, 50 feet from centerline of intermittent streams, and 50 feet from the edge of sensitive habitats to be protected including riparian zones. The Greenway project includes strategies to design and locate amenities to ensure that impacts on sensitive habitat are avoided or minimized to the extent feasible, including locating trails outside of riparian corridors when possible. Additional strategies include the prohibition of the removal of native vegetation within the riparian zone with exceptions for vegetation removal for maintenance, flood conveyance, and to remove imminent threats to people or property. This strategy states that the removal of native vegetation will occur only when no feasible alternative exists and shall be confined to the necessary minimum in order to protect natural riparian areas. In addition, Mitigation Measures 5-1d and 5-2c would further reduce impacts to riparian areas due to requirements to re-evaluate amenity locations after site-specific resources are determined and to obtain a Lake or Streambed Alteration Agreement from the California Department of Fish and Game. With these design criteria and proposed mitigation, cumulative impacts to biological resources are considered less than significant.

Cultural Resources

The Placer County General Plan and individual community plans include policies to protect cultural resources. The inclusion of project Mitigation Measures 6-1 (Conduct project-level resource investigations and implement proposed mitigation), 6-2 (Stop work if archeological artifacts are discovered during construction), and 6-3 (retain a professional paleontologist during construction), are consistent with plan policies and County mitigation requirements. The project's contribution to cumulative cultural resource impacts would therefore be considered less than significant.

Visual Resources

The construction and use of Greenway amenities (e.g. trails and connecting nodes features) would be expected to result in minimal impacts on visual resources within the project area. The inclusion of Mitigation Measure 7-1 requiring a site-specific visual impact analysis for individual Greenway projects ensures that the proposed project's cumulative impacts to visual resources would be less than significant.

Transportation and Circulation

The Greenway amenities would add to the available network of alternative transportation routes. Cumulative impacts to transportation and circulation are considered less than significant.

Soils, Geology, and Seismicity

Construction of Greenway trails and nodes is subject to project level mitigation (Mitigation Measure 11-2) including compliance with the applicable grading and erosion control requirements in the Placer County Land Development Manual. With implementation of this mitigation measure, cumulative impacts to soils and geology are considered less than significant.

Hydrology and Water Quality

Site locations, grading, and construction of Greenway amenities would have the potential to contribute to impacts related to hydrology and water quality. Construction is subject to project level mitigation (Mitigation Measure 12-1a and 12-1b) including obtaining a General Construction Stormwater Permit and complying with the applicable grading and erosion control requirements in the Placer County Land Development Manual. Mitigation Measures 12-2 and 12-3 also require individual site-specific analysis (and implementing required subsequent mitigation) for storm water runoff and flooding impacts.

With implementation of these mitigation measures, cumulative impacts to hydrology and water quality are considered less than significant.

15.7.3 Conclusion

The Greenway Vision project is designed to be developed and used in a manner consistent with the existing goals and policies of the Placer County General Plan, as well as the relevant goals and policies of the community plan areas in which the project is located. With incorporation of mitigation measures, including standard development policies related to grading, flood control, and habitat protection, cumulative impacts are considered to be less than significant.

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