

The effects of mitigation on future roadway and intersection operations will depend on which improvements are constructed, the timing of such improvements, and development patterns in the region. As the improvements are designed and funded, they will be subject to review and analysis, including traffic studies. For example, an Environmental Impact Statement/Environmental Impact Report being prepared for Placer Parkway will identify the impacts of that improvement on regional roads. In some cases, segments or intersections could operate at unacceptable levels as the result of one or more mitigation measures being implemented. This is a *significant impact*. (DEIR, p. 6.12-119.)

Implementation of this mitigation would reduce Impact 6.12-26, but not to a level of less-than-significant. The feasibility of improvements necessary to achieve acceptable levels of service is unknown. Therefore, no assurance exists that the recommended mitigation will achieve the desired LOS. Therefore, this impact would remain *significant and unavoidable*. (DEIR, p. 6.12-119.)

**Mitigation Measure:**

6.12-26        *Placer County shall coordinate with the City of Roseville, Sacramento County, Sutter County and Caltrans to ensure that roadway improvements implemented in whole or in part as mitigation for the proposed project are designed to minimize impacts on existing and future roadways and intersections according to the LOS policies of affected jurisdictions.*

**Significance After Mitigation:**

Significant and unavoidable.

**Impact 6.12-27:**        **Mitigation measures implemented to reduce transportation impacts could adversely affect the natural environment. This impact is *potentially significant*.** (DEIR, p. 6.12-119.)

**Finding:**

Changes or alterations have been required in, or incorporated into, the project that substantially lessen, but do not avoid, the potentially significant environmental effect associated with adverse effects on the natural environment as a result of mitigation measures implemented to reduce transportation impacts. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

**Explanation:**

The roadway improvements identified in mitigation measures throughout this section would have physical effects on the environment, primarily during construction. The exact nature of such effects will not be known until the design phase of each improvement. However, impacts that are typical of roadway improvements can be identified and discussed. The nature of these effects will be refined when the various improvements are under design and environmental review. (DEIR, p. 6.12-119.)

Depending on their location, roadway widenings could require the acquisition of right-of-way, which may contain buildings, including homes. Such acquisition would be done in compliance with State law requiring that property owners be compensated for any property acquired for public works. (DEIR, p. 6.12-119.)

If roadway widening exceeds existing rights-of-way in agricultural areas, some farmland could be lost. Because the loss would be a relatively narrow strip of land, it would not typically result in the loss of entire agricultural parcels. (DEIR, p. 6.12-119.)

Roadway widenings would not substantially alter the visual character of existing roadways. However, new roads through rural areas, such as Placer Parkway, would alter views. Depending on the viewshed and surrounding uses, such changes in visual character could be significant. (DEIR, p. 6.12-119.)

Roadways and related infrastructure can increase impervious surfaces and/or interfere with stormwater drainage, increasing the potential for flooding. (DEIR, p. 6.12-119.)

Roadway construction could occur in areas supporting biological resources, such as wetlands, trees, riparian habitat and grasslands. Wildlife and plants using these habitats could be disturbed or destroyed by construction activities, resulting in the loss of open space, special-status plant species, habitat for special-status animals, including vernal pool crustaceans, valley elderberry longhorn beetle, western pond turtle, tri-colored blackbird, California horned lizard, bats, nesting burrowing owls and other raptors, foraging habitat for raptors, and oak woodlands and heritage trees. For the most part, the loss of raptor foraging habitat would include a narrow band of land that would leave the adjacent habitat intact. (DEIR, pp. 6.12-119 to 6.12-120.)

Excavation and grading for roadway improvements could damage or destroy subsurface historic or prehistoric resources. (DEIR, p. 6.12-120.)

Construction activities would generate air emissions, including particulate matter and ozone, contributing to regional air pollution. If homes or schools are located near the construction area, they could be disturbed by dust. (DEIR, p. 6.12-120.)

Construction activities would also generate substantial noise. If residents or other sensitive receptors are located near construction areas, they could be disturbed by noise. Once roadway improvements are complete, the construction noise would cease. However, traffic noise could increase, and depending on the location of the road and

nearby sensitive receptors, adopted noise standards could be exceeded. (DEIR, p. 6.12-120.)

Roadways could be widened or constructed in areas that had been used for agricultural or industrial operations. In such areas, hazardous materials may be present. If undiscovered, construction workers could be exposed to contaminated soils or groundwater. This impact is *significant*. (DEIR, p. 6.12-120.)

The following measures would reduce the impacts from traffic mitigation. However, because the mitigation improvements have not been sited and/or designed, it cannot be determined at this time whether all of these impacts could be reduced to a less than significant level. Furthermore, some of the measures would be outside of Placer County's jurisdiction. The County cannot compel other jurisdictions to implement these or equivalent measures. For these reasons, this impact is considered *significant and unavoidable*. (DEIR, p. 6.12-120.)

**Mitigation Measure:**

6.12-27 *Implement the following Mitigation Measures.*

- 6.2-1, which requires mitigation for the loss of agricultural land in the County for agricultural land converted by the Regional University Specific Plan;
- 6.3-1 and 6.3-2, which require dust control and measures to reduce air pollutant emissions;
- 6.4-1 through 6.4-8, which require surveys for special status species and their habitat, habitat avoidance and compensation where needed, and protection of nesting raptors;
- 6.5-1, 6.5-2, and 6.5-3, which describe the proper handling of discovered prehistoric or historic resources, human remains, and paleontological resources if they are discovered during construction;
- 6.7-4, which uses existing Phase I Site Assessments to identify potential contamination, and specifies how to handle potential hazards to minimize the risk of exposure;
- 6.8-1(a) - (d) and 6.8-3(a), which require site-specific drainage studies and ensure that project flows can be accommodated by storm drainage infrastructure and reduce the risk of flooding;
- 6.9-2, which limits the hours during which grading can occur.

(DEIR, pp. 6.12-120 to 6.12-121.)

**Significance After Mitigation:**

Significant and unavoidable.

**M. GREENHOUSE GAS EMISSIONS AND GLOBAL CLIMATE CHANGE**

**Standards of Significance**

Because climate change regulation is a relatively recent development, no air district in California, including the Placer County Air Pollution District, has identified a significance threshold for GHG emissions or a methodology for analyzing air quality impacts related to greenhouse gas emissions. The State has identified 1990 emission levels as a goal to be achieved through adoption of AB 32. To meet this goal, California would need to generate lower levels of GHG emissions than current levels. However, no standards have yet been adopted quantifying 1990 emission targets. It is recognized that for most projects there is no simple metric available to determine if a single project would help or hinder meeting the AB 32 emission goals. In addition, at this time, AB 32 only applies to stationary source emissions. Consumption of fossil fuels in the transportation sector accounted for over 40% of the total GHG emissions in California in 2004. Current standards for reducing vehicle emissions considered under AB 1493 call for “the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles,” and do not provide a quantified target for GHG emissions reductions for vehicles. (DEIR, p. 6.13-8.)

Emitting CO<sub>2</sub> into the atmosphere is not itself an adverse environmental affect. In fact, the generation of CO<sub>2</sub> occurs naturally: natural sources of CO<sub>2</sub> include volcanic eruptions, decay of dead plant and animal matter, evaporation from the oceans, and respiration (breathing). It is the increased concentration of CO<sub>2</sub> in the atmosphere potentially resulting in global climate change and the associated consequences of climate change that result in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to generally estimate a project’s incremental contribution of CO<sub>2</sub> into the atmosphere, it is typically not possible to determine whether or how an individual project’s relatively small incremental contribution might translate into physical effects on the environment. Given the complex interactions between various global and regional-scale physical, chemical, atmospheric, terrestrial, and aquatic systems that result in the physical expressions of global climate change, it is impossible to discern whether the presence or absence of CO<sub>2</sub> emitted by the project would result in any altered conditions.

Given the challenges associated with determining project-specific significance criteria for GHG emissions when the issue must be viewed on a global scale, a quantitative significance criterion is not proposed for the RUSP project. For this analysis, a project’s

incremental contribution to global climate change would be considered significant if, due to the size or nature of the project, it would generate a substantial increase in GHG emissions relative to existing conditions. (DEIR, p. 6.13-9.)

**Impact 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. This impact is *potentially significant*.** (DEIR, p. 6.13-9.)

**Finding:**

Changes or alterations have been required in, or incorporated into, the project that substantially lessen, but do not avoid, the potentially significant environmental effect associated with the cumulatively considerable incremental contribution to the significant cumulative impact of global climate change as a result of development of the RUSP. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

**Explanation:**

In 2003, global emissions of carbon (i.e., only the carbon atoms within CO<sub>2</sub> molecules) solely from fossil fuel burning totaled an estimated 7,303 million metric tons.<sup>13</sup> This translates to approximately 29,400 million tons of CO<sub>2</sub>. This is only a portion of global CO<sub>2</sub> emissions because it addresses only fossil fuel burning and does not address other CO<sub>2</sub> sources such as burning of vegetation. Total estimated CO<sub>2</sub> emissions from all sources associated with the RUSP would be less than 0.00035 percent of this partial global total. CO<sub>2</sub> emissions in California totaled approximately 391 million tons in 2004. Total CO<sub>2</sub> emissions from the RUSP project, as estimated above, would be 0.026 percent of this statewide total. (DEIR, p. 6.13-9.)

However, as noted above, the emission calculation methodology treats project emissions as if they were new emissions, and does not correct for the fact that many emission sources associated with the RUSP could simply be moving from an existing location to the project site. Therefore, the project's net contribution of CO<sub>2</sub> to global climate change would be much less than 103,000 tons per year estimated for the proposed project. Similarly, the project's proportion of global and statewide emissions would be less than described above. (DEIR, p. 6.13-9.)

Although it is clear that the RUSP's net contribution of CO<sub>2</sub> to global climate change will be less than estimate above, a great deal of uncertainty exists regarding what the net CO<sub>2</sub> emissions would actually be. In addition, it is uncertain how current regulations might affect CO<sub>2</sub> emissions attributable to the project and cumulative CO<sub>2</sub> emissions from other sources in the state. Also, as described previously, it cannot be determined how CO<sub>2</sub> emissions associated with the RUSP might or might not influence actual physical effects of global climate change. For these reasons, it is uncertain whether the

RUSP would generate a substantial increase in GHG emissions relative to existing conditions, and whether emissions from the RUSP would make a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change. (DEIR, p. 6.13-9.)

Notwithstanding such uncertainty, the RUSP is a relatively large project, which, if evaluated at either a local or regional scale, would emit CO<sub>2</sub> and other GHGs at higher volumes than many other types of development. Therefore, a conservative approach has been used for this analysis, and the RUSP project is considered to potentially make a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change. (DEIR, pp. 6.13-9 to 6.13-10.)

The state's primary source of GHG emissions is the consumption of fossil energy. The proposed RUSP has several components, discussed below, that would reduce consumption of fossil energy within the Plan Area, and thereby reduce potential GHG emissions. These components are consistent with "smart growth" principles developed and promoted by the Sacramento Area Council of Governments (SACOG). SACOG smart growth principles include higher densities and compact development, diversity of land uses, neighborhoods designed to promote walking and biking, and access to regional destinations.

#### **"Smart Growth" Factors**

The proposed RUSP has several components and objectives that promote the use of alternative modes of transportation that produce fewer greenhouse gas emissions than single-occupancy vehicle travel or none at all. Portions of the proposed development have been designed to encourage walking and biking. The University campus is designed so that there is limited vehicular access. In addition, the adjoining community provides large sidewalks, multi-use trails, Class II and Class III bicycle trails, parks and open space with connectivity, traffic calming measures, and centrally located commercial areas to help promote walking and biking. The overall design and land use plan of the RUSP creates a development pattern that is more compact than most other development in Placer County. The land use plan also includes a mixed-use component, including some live-work units, which would further encourage less reliance on vehicular transportation within the community. The RUSP is located adjacent to other planned development, such as the West Roseville Specific Plan area, within the southwest Placer County. In addition, SACOG identifies the area as a prime location for dense development, due to its location near employment centers and Sacramento. These factors would help to reduce vehicle miles traveled in the region, reducing the proposed project's contribution of GHGs to the global impact. Please see Draft EIR Chapter 4.0, Land Use, for a more detailed discussion of SACOG smart growth principles. (DEIR, p. 6.13-10.)

#### **Traffic Factors**

Measures and design components incorporated into the project that decrease stop-and-go driving and idling at intersections will help reduce overall fuel consumption and GHG emissions. The RUSP's transportation and circulation system would also promote non-vehicular travel through the implementation of traffic calming measures that would make roads safer for pedestrians and bicyclists, and therefore promote walking and biking as the preferable means of transportation within the community, rather than vehicular transportation. (DEIR, p. 6.13-10.)

Even with the above smart growth factors and traffic design, however, the RUSP would result in a substantial amount of GHG emissions over current emissions. Because it cannot be determined to a reasonable degree of certainty that the GHG emissions generated by the RUSP would not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change, the impacts of the proposed project on global climate change are considered *significant*. (DEIR, p. 6.13-10.)

Broadly speaking, climate change mitigation and adaptation strategies fall into three categories: (1) transportation sector strategies; (2) electricity sector strategies, including renewable energy and energy efficiency; and (3) all other adaptation strategies, such as carbon sequestration, participation in emissions trading markets and research and public education. Implementation of the proposed project's air quality and transportation and circulation mitigation measures will also help reduce potential GHG emissions by smoothing the flow of traffic to allow engines to operate more efficiently. Improvements in vehicle efficiency and alternative fuel vehicles will also help reduce GHG emissions in the project area. Implementation of the following mitigation measures would substantially lessen greenhouse gas emissions within the Plan Area, but would not mitigate them to a level that is less than significant. Therefore, this impact would remain *significant and unavoidable*. (DEIR, pp. 6.13-10 to 6.13-11.)

**Mitigation Measures:**

- 6.13-1 a) *Implement Mitigation Measure 6.3-4(a), establishing guidelines for County review of future project-specific submittals for non-residential development within the Specific Plan area in order to reduce generation of air pollutants:*
- b) *Implement Mitigation Measure 6.3-4(b), requiring incorporation of passive solar building design and landscaping conducive to passive solar energy use.*
- c) *Implement Mitigation Measure 6.3-4(c), requiring measures to promote bicycle usage.*

- d) *The following measures shall be used singularly or in combination to accomplish an overall reduction of 10 to 20% in residential energy consumption relative to the requirements of State of California Title 24:*
- *Use of air conditioning systems that are more efficient than Title 24 requirements;*
  - *Use of high-efficiency (such as Energy Star) heating and other appliances, such as water heaters, including solar water heaters, cooking equipment, refrigerators, and furnaces;*
  - *Installation of photovoltaic rooftop energy systems where feasible;*
  - *Use of energy saving compact fluorescent light bulbs;*
  - *Establishment of tree-planting guidelines that require residents to plant trees to shade buildings primarily on the west and south sides of the buildings. Use of deciduous trees (to allow solar gain during the winter) and direct shading of air conditioning systems shall be included in the guidelines; and*
  - *Other new effective technologies and strategies that become available during project development.*
- e) *Transit usage and ride sharing shall be promoted by requiring participation in the development of a regional transit system at such time as a system is established and set-asides of land for park-and ride facilities. Fair share participation may consist of dedication of right-of-way, easements, capital improvements, and/or other methods of participation deemed appropriate. In addition, future project design shall ensure that an adequate number of developers in the plan area provide reservations for future installations of bus turnouts and passenger benches and shelters, to be installed at such time as transit service is established and as demand and service routes warrant. Transit centers shall be connected with the Class I bicycle trail. A public transit development fee may be required for all development projects. The amount of this fee shall be based upon the traffic generation potential of each project. A dial-a-ride transportation system may be established to reduce individual vehicle trips and establish data for the eventual formation of a transit system within the plan area.*

*In addition, the applicant or its successor(s) in interest shall provide each home and business with an information packet that will contain, at a minimum, the following information:*

- *Commute options: to inform plan area occupants of the alternative travel amenities provided, including ridesharing and public transit availability/schedules;*
  - *Maps showing plan area pedestrian, bicycle, and equestrian paths to community centers, shopping areas, employment areas, schools, parks, and recreation areas; and*
  - *Information regarding PCAPCD programs to reduce county-wide emissions.*
- f) *Developers of both public and private schools shall be encouraged to incorporate the following measures into the design, construction, and operation of school buildings and facilities:*
- *Install bicycle lockers and racks at all appropriate locations;*
  - *Post signage prohibiting the idling of diesel vehicles for longer than five minutes;*
  - *Construct at least one bus stop at a convenient location to be used for either fixed route service within the plan area or commuter service;*
  - *Provide a community notice board and information kiosk with information about community events, ride-sharing, and commute alternatives; and*
  - *Provide preferential parking for carpools and hybrid vehicles (vehicles with self-charging electric engines).*
- g) *The following measures shall be incorporated into the design, construction, and operation of public park areas:*
- *The pedestrian/bikeway (P/B) master plan shall provide at least one Class I linkage to all school sites;*
  - *Additional Class I and II linkages shall be provided to provide convenient access to/from the park sites;*
  - *Install bicycle lockers and racks at all appropriate locations; and*
  - *Provide a community notice board and information kiosk with information about community events, ride-sharing, and commute alternatives.*

- h) *Prohibit open burning throughout the plan area. Include this prohibition in any project CC&Rs that are established.*
- i) *Implement Mitigation Measures 6.12-1 through 6.12-26 to ease traffic congestion, in order to provide a pedestrian and bicycle-safe transportation and circulatory system within the Plan Area, thereby increasing the chance that residents will walk and ride within the RUSP.*
- j) *Placer County and the project applicant shall work together to publish and distribute an Energy Resource Conservation Guide describing measures individuals can take to increase energy efficiency and conservation. The applicant shall provide a portion of the funding necessary to prepare the Guide, along with the developers of other projects in the region. The Energy Resource Conservation Guide shall be updated every 5 years and distributed at the public permit counter.*
- k) *The project applicants shall pay for an initial installment of Light Emitting Diode (LED) traffic lights in all Plan Area traffic lights.*
- l) *The project applicants and Placer County shall jointly develop a tree planting informational packet to help project area residents understand their options for planting trees that can absorb carbon dioxide.*
- m) *Prioritized parking within commercial and retail areas shall be given to electric vehicles, hybrid vehicles, and alternative fuel vehicles.*
- n) *The County shall monitor and support the efforts of the California Air Resources Board, the California Energy Commission, the California Public Utilities Commission, the California Power Authority, and another other State Agency charged with reducing California's contribution to global climate change to formulate mitigation strategies, if any, that may be implemented on a voluntary basis by local government. If and when any such strategies become available, the County shall condition site-specific approvals under the Regional University Specific Plan on the adoption of such measures if the County Board of Supervisors determines that such measures are feasible. As used in this Mitigation Measure, "feasible" means: (1) the mitigation strategy has been successfully demonstrated in the same or very similar application; (2) the mitigation strategy has been demonstrated in a similar development such that application of the mitigation strategy to the Regional University site specific development is appropriate; and (3) the mitigation strategy is cost effective in terms of the number of dollars that would be expended per metric ton of GHG emissions reduced.*

- o) *Promote a reduction in residential emissions by encouraging the installation of conveniently located electrical outlets within the front, side, and rear yards of all residential structures, as appropriate, to support the use of electrical landscaping equipment.*

(DEIR, pp. 6.13-11 to 6.13-13; FEIR, pp. 2-32 to 2-33.)

**Significance After Mitigation:**

Significant and unavoidable.

Effects of Global Climate Change on Water Resources

Standards of Significance

Based on Appendix G of the CEQA Guidelines, Placer County has determined that a significant environmental impact could occur if the proposed Specific Plan would:

- Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements are needed.
- Substantially deplete groundwater supplies.
- Be inconsistent with the goals and policies of the *Placer County General Plan* adopted for the purpose of avoiding or mitigating environmental effects.
- Be inconsistent with the applicable terms of the Water Forum Agreement (WFA) (January 2000).

The source of the proposed surface water supply and hydrologic-related impacts are discussed in Section 6.14, Water Supply, of the Draft EIR (DEIR). (DEIR, p. 6.13-21.)

**Impact 6.13-2:** **The impacts of global climate change on water supply and availability could affect future water supply and availability in the Plan Area. This impact is less than significant.** (DEIR, p. 6.13-22.)

**Finding:**

Under CEQA, no mitigation measures are required for impacts that are less than significant.

(Pub. Resources Code, § 21001; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

**Explanation:**

Because considerable uncertainty remains with respect to the overall impact of global climate change on future water supply in California, it is unknown to what degree global climate change will impact future Placer County water supply and availability. However, based on consideration of the recent regional and local climate change studies described in the literature review above, and based on an assessment of water supply under the RUSP, it is reasonably expected that the impacts of global climate change on water supply would be *less than significant*. (DEIR, p. 6.13-22.)

As described by the literature survey above, overall, climate change is expected to have a greater effect in Southern California and agricultural users than urban users in the Sacramento Valley/Sierra Nevada area. For example, for 2020 conditions, where optimization is allowed (i.e., using the CALVIN model), scarcity is essentially zero in the Sacramento Valley for both urban and agricultural users, and generally zero for urban users in the San Joaquin and Tulare Basins. Rather, most water scarcity will be felt by agricultural users in Southern California, though Southern California urban users, especially Coachella urban users, will also experience some scarcity. By the year 2050, urban water scarcity will remain almost entirely absent north of the Tehachapi Mountains, although agricultural water scarcity could increase in the Sacramento Valley to about 2%. (DEIR, p. 6.13-22.)

Based on the conclusions of current literature regarding California's ability to adapt to global climate change, it is reasonably expected that, over time, the State's water system will be modified to be able to handle the projected climate changes, even under dry and/or warm climate scenarios. (DEIR, p. 6.13-22.)

Although coping with climate change effects on California's water supply could come at a considerable cost, based on a thorough investigation of the issue, it is reasonably expected that statewide implementation of some, if not several, of the wide variety of adaptation measures available to the state, will likely enable California's water system to reliably meet future water demands. For example, traditional water supply reservoir operations may be used, in conjunction with other adaptive actions, to offset the impacts of global warming on water supply. Other adaptive measures include better urban and agricultural water use efficiency practices, conjunctive use of surface and ground waters, desalination, and water markets. More costly statewide adaptation measures could include construction of new reservoirs and enhancements to the state's levee system. As described by Medellin et al. 2006, with adaptation to the climate, the water deliveries to urban centers are expected to decrease by only 1%, with Southern California shouldering the brunt of this decrease. (DEIR, pp. 6.13-22 to 6.13-23.)

Although California could potentially experience an increased number of single-dry and multiple-dry years as a result of global climate change, based on current knowledge, it is

reasonably expected that such increase would not significantly affect the ability of the Placer County Water Agency (PCWA), with its very substantial upstream storage capacity, to reliably meet the RUSP's build-out water demands. As described by the PCWA Integrated Water Resources Plan (IWRP), PCWA's use of an integrated resources approach will ensure that there is adequate water supply to reliably meet all the projected PCWA western Placer County service area demands, including those of the proposed project, even under single-year and multiple year drought conditions. (DEIR, p. 6.13-23.)

Importantly, each of PCWA's surface water supply entitlements for use in western Placer County has historically demonstrated a high reliability during even multiple-dry years. PCWA's first source of surface water supply is a water supply contract with PG&E for 100,400 acre feet annually (afa) of Yuba/Bear River Water that is delivered through PG&E's Drum Spaulding hydro system. This source of water has a high reliability during normal, single-dry, and multiple-dry years. For example, between 1987 and 1992, California experienced five years of drought, during which many areas in the state had reduced supplies. During that period, PCWA had a full Yuba/Bear River supply each year. Indeed, the only year in which PCWA had to impose drought restrictions on its customers due to reduced PG&E supply was 1977, the driest single year in California's measured hydrologic record. PCWA's second source of water supply (i.e., Middle Fork Project water rights) also has high reliability during even multiple-dry years. Finally, the Agency's third source of surface water (i.e., its federal CVP Municipal and Industrial water supply contract), currently anticipated to be exercised on the Sacramento River, should also be a reliable source of water because under the Agency's Integrated Water Resources Plan, the Agency plans to supplement its CVP contract supply with groundwater in dry years to improve reliability to the point where the full contract amount can be relied upon to serve urban development needs. See below for a discussion of climate change impacts on groundwater supply. (DEIR, p. 6.13-23.)

In addition, PCWA's surface water supply entitlements are unlikely to be affected by global climate change because, as indicated by preliminary results from DWR, water supply impacts from climate change would be largely reflected in reduced south-of-Delta exports, while existing Delta water quality requirements would continue to be satisfied. It is therefore reasonable to consider that global climate change may have relatively less effect on the Placer County water supply because the PCWA's surface water supplies are based on existing water rights and contract entitlements for in-basin use above the Delta. (DEIR, p. 6.13-24.)

Based on current knowledge, global climate change is also not expected to significantly impact groundwater supply for the Plan Area. Western Placer County lies within the northeastern section of the North American Groundwater sub-basin, which lies in the eastern central portion of the Sacramento Groundwater Basin. Preliminary studies indicate that the Sacramento Valley would experience only a small decline in groundwater levels as a result of global climate change. Although groundwater may be used to supplement surface water supply to the Plan Area during dry years, it is unlikely that such future groundwater pumping would exceed safe yield. The PCWA integrated

water resources strategy anticipates that groundwater pumping would not exceed safe yield as long as the long-term (multiple years) average does not exceed 95,000 ac-ft/yr. Although, as discussed above, there is still a great deal of uncertainty with respect to impacts of climate change on future groundwater availability in California, in view of the high reliability of PCWA surface water supplies and the wide variety of integrated water management techniques available to PCWA, long-term average groundwater pumping is not reasonably expected exceed the 95,000 ac-ft/yr average. Moreover, the planned replacement of agricultural lands in western Placer County with urban development is expected to result in an in-lieu groundwater recharge, thereby further reducing the likelihood of a groundwater overdraft. The impacts of global climate change on groundwater in western Placer County are, therefore, reasonably considered less than significant. (DEIR, p. 6.13-24.)

For these reasons, impacts of global climate change on water supply for proposed project are considered *less than significant*. (DEIR, p. 6.13-24.)

**Mitigation Measure:**

None required.

**Significance After Mitigation:**

Less than significant

**N. WATER SUPPLY**

**Standards of Significance**

Based on Appendix G of the CEQA Guidelines, Placer County has determined that a significant environmental impact could occur if the proposed Specific Plan would:

- Result in insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements are needed;
- Require or result in the construction of new water treatment facilities or expansion of existing facilities, which could cause significant environmental effects;
- Substantially deplete groundwater supplies;
- Be inconsistent with the goals and policies of the *Placer County General Plan*; or
- Be inconsistent with the applicable terms of the WFA.

**Impact 6.14-1:**      **The water demand resulting from the proposed project could result in insufficient entitlements to surface water or exceed sustainable yield or groundwater supplies. This impact is *potentially significant*.** (DEIR, p. 6.14-20.)

**Finding:**

Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the Final EIR.

**Explanation:**

Current surface water entitlements for western Placer County are 255,400 AFA, with dry year reductions to 196,450 AFA. In 2004, the PCWA used 112,768 ac-ft to meet the needs of Zone 1 and Zone 5 customers, and delivered 18,443 ac-ft to other agencies, for a total demand of 131,211 ac-ft. The resulting surplus in surface water supply is over 65,000 AFA during dry years. The addition of the proposed project demand of 3,220 AFA would not exceed PCWA entitlements, even during dry years. (DEIR, p. 6.14-20.)

In April 2008, PCWA and the project applicant (KT Communities) entered into a Master Facilities Agreement for the provision of water to the proposed project. The Agreement establishes a mutual understanding regarding the extent of the infrastructure that will be required for the project and related projects, how and when it is to be provided and the Agency's commitment to provide water service to the Service Area. The Agreement does not affect the water-related environmental impact analysis in the DEIR and increases the certainty and reliability of the PCWA water supply for the project area. (FEIR p. 2-33.)

The proposed project would result in a total demand of 3,220 AFA, but when factoring in the use of recycled water, the proposed project water demand would be 2,420 AFA. Initially, surface water could come from existing unallocated treatment capacity in the proposed Foothill/Sunset/Ophir system and a connection to an existing pipeline at Fiddymont Road and Base Line Road. As discussed previously, water through this route is limited to a peak flow rate of up to 10 MGD based on an agreement between PCWA and the City of Roseville. The pipeline would extend west along Base Line Road and then north along the proposed Watt Avenue extension to the southwest corner of the Plan Area. (DEIR, p. 6.14-20; FEIR, p. 2-35.)

Prior to the completion of the buildout of the Project, it is likely that PCWA will need to expand its treatment plant capacity and possibly supplement its wheeling capacity through Roseville because of concurrent development of other proposed projects in western Placer County. The next increment of expanded treatment capacity is expected to be the Ophir WTP. The construction of new transmission lines connecting PCWA's existing transmission system in the Sunset Industrial area, installed in the extension of

Pleasant Grove Boulevard, to the Project may be required if the wheeling capacity is exceeded prior to the completion of the Sacramento River Diversion. (DEIR, p. 6.14-20.)

The Sacramento River Diversion project would include connection to the west end of the pipeline in Base Line Road, which feeds the Project, and would allow PCWA to reduce that amount of water that must be wheeled through Roseville. If the Sacramento River Diversion project is approved and completed before the wheeling capacity through Roseville is exceeded, no additional offsite pipelines would be required to serve the buildout of the Project. (DEIR, p. 6.14-20.)

If, at some stage in the development of the Project, PCWA is unable to supply all required surface water to the project, water could be supplied from groundwater source, at the discretion of PCWA until planned facilities are completed. The displacement of historic groundwater pumping for rice cultivation would result in a net reduction in groundwater withdrawal of 2,440 AFA, compared to a projected development buildout demand of 3,220 AFA in a basin with an existing demand of 90,000 AFA and a sustainable yield of 95,000 AFA. Therefore, the interim use of groundwater to serve a portion of the Project, if necessary, would have a *less-than-significant impact* on the groundwater resources. (DEIR, pp. 6.14-20 to 6.14-21.)

Because recycled water would be used and there are sufficient PCWA surface water entitlements to serve the project even during dry years, there would be no net increase in groundwater withdrawal under any water supply scenario. Thus, the water demand associated with the proposed project would not exceed current surface water entitlements or exceed current groundwater withdrawal. However, while PCWA is proposing to use the new Sacramento River diversion, PCWA must still undergo the CEQA/NEPA and Endangered Species Act processes in order to complete the Sacramento River diversion. In addition, the timing of surface and recycled water delivery to the project site is uncertain. Therefore, this would be considered a *potentially significant impact*. (DEIR, p. 6.14-21.)

**Mitigation Measure:**

- 6.14-1 a) *Prior to approval of any small lot tentative subdivision map for a proposed residential project of more than 500 dwelling units, the County shall comply with Government Code section 66473.7. Prior to approval of any small lot tentative subdivision map for a proposed residential project of 500 or fewer units, the County need not comply with section 66473.7, or formally consult with PCWA or other public water system, but shall nevertheless make a factual showing or impose conditions similar to those required by section 66473.7 in order to ensure an adequate water supply for development authorized by the map. Prior to recordation of any final subdivision map, or prior to County approval of any similar project-specific discretionary approval or entitlement required for non-residential*

uses, the applicant shall demonstrate the availability of a long-term, reliable water supply from a public water system for the amount of development that would be authorized by the final subdivision map or project-specific discretionary nonresidential approval or entitlement. Such a demonstration shall consist of a written certification from the water service provider that either existing sources are available or that needed improvements will be in place prior to occupancy.

- b) *The Specific Plan proponents shall, prior to the approval and recordation of the first small lot final subdivision map, prepare and submit a water conservation plan for review and approval by the Placer County Planning Department and PCWA. The plan shall identify specific measures that shall be implemented as part of the Specific Plan, supported by documentation of the estimated water savings to be anticipated through implementation of the conservation measures.*
  
- c) *Prior to approval of any small lot tentative subdivision map or similar project level discretionary approval for land uses that do not require a tentative subdivision map, the project applicant, in conjunction with the Placer County Water Agency (PCWA), shall perform an analysis of the remaining wheeling capacity in the City of Roseville's system. This analysis shall consider all of the previously committed demand to Morgan Creek, Placer Vineyards, Regional University or other projects within southwest Placer County that rely on water conveyed through City of Roseville facilities and/or pursuant to the wheeling agreement between the City of Roseville and PCWA, as amended from time to time. The analysis shall be submitted to both the County and the City of Roseville. The County shall confirm with PCWA that uncommitted capacity remains to wheel the required amount of PCWA-supplied water to the Specific Plan area prior to approval of discretionary actions. In the event sufficient uncommitted capacity does not exist, the County shall not grant the proposed tentative subdivision map or other project level discretionary approval until the County determines that a water supply not dependent on water from PCWA that is wheeled through the Roseville system becomes available for the area at issue.*
  
- d) *Prior to approval of any small lot tentative subdivision map or similar project level discretionary approval for land uses that do not require a tentative subdivision map, the project applicant, in conjunction with PCWA, shall show that total RUSP groundwater withdrawal will be limited to less than 2,440 AFA for the entire Plan Area.*

(DEIR, pp. 6.14-21 to 6.14-22; FEIR, p. 2-34-35.)

**Significance After Mitigation:**

Less than significant.

**Impact 6.14-2:**      **The water demand resulting from the proposed project could result in the construction or expansion of existing facilities, which could cause significant environmental effects. This impact is *less than significant*.** (DEIR, p. 6.14-22.)

**Finding:**

Under CEQA, no mitigation measures are required for impacts that are less than significant.

(Pub. Resources Code, § 21001; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

**Explanation:**

The initial surface water supply would be provided through PCWA's Foothill/Sunset Water Treatment Plant system until the long-term water supply system is completed. The proposed project includes three options for connecting to surface water supplies. The primary option would include connecting to an existing pipeline at Fiddymont Road and Base Line Road. The pipeline would extend west along Base Line Road and then north along the proposed Watt Avenue extension to the southwest corner of the Plan Area. The physical impacts of constructing this infrastructure are assumed as part of this project and are evaluated throughout this EIR. (DEIR, p. 6.14-22.)

The proposed project includes two other options to connect to the City of Roseville system, within the West Roseville Specific Plan area, which is yet to be constructed. The corridors for these connections are shown in Draft EIR Figure 2-9. For any of these options, treated surface water could be delivered through the City of Roseville's system via a cooperative agreement between PCWA and the City of Roseville. However, the wheeling agreement between PCWA and the City of Roseville does not allow for connections other than at Fiddymont and Base Line Roads. If these other connection points are pursued, prior to amending the wheeling agreement, the City would likely require that the project applicant evaluate the potential for impacts on the City of Roseville system, including low pressure and water quality impacts. (DEIR, p. 6.14-22.)

PCWA's long-term water supply plan consists of a pipeline extending west along Base Line Road, south to Elverta Road, and then west finally connecting to the Sacramento River. Upon completion of the Sacramento Diversion project, water supplies from this source would ultimately serve the proposed project. However, connection to the Sacramento River diversion is not required specifically to serve the proposed project, but would be needed to serve the cumulative anticipated growth in western Placer County. The proposed project's contribution to the cumulative impact of this water supply is discussed in Impact 6.14-4. (DEIR, p. 6.14-22.)

The groundwater supply would be provided by on-site wells and pipelines internal to the project. The proposed project would include construction of off-site pipelines to connect to existing surface water supplies and the onsite construction of groundwater wells and treatment systems, distribution systems, and storage tanks to supply water to the proposed project. The physical impacts of constructing this infrastructure are assumed as part of this project and are evaluated throughout this EIR. No off-site infrastructure would be required for use of groundwater. (DEIR, p. 6.14-23.)

At this time it would be speculative to identify the level of significance of potential environmental impacts on the City of Roseville's system. The impacts associated with construction of required infrastructure, including the pipeline from Base Line and Fiddymont Roads, are addressed in this EIR. The current wheeling agreement between PCWA and the City of Roseville allows the connection at Base Line and Fiddymont Roads. As a result, the environmental impacts of the infrastructure to meet project water demands would be *less than significant*. (DEIR, p. 6.14-23.)

**Mitigation Measure:**

None required.

**Significance After Mitigation:**

Less than significant.

**Impact 6.14-3:**      **The proposed project, in combination with other development projects in western Placer County, could result in cumulative impacts from curtailment of development due to shortfalls in water supplies. This impact is *less than significant*.** (DEIR, p. 6.14-35.)

**Finding:**

Under CEQA, no mitigation measures are required for impacts that are less than significant.

(Pub. Resources Code, § 21001; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

**Explanation:**

Consistent with direction provided by the Court in the *Vineyard* decision, the County has used available information to describe probable sources of water and to disclose the reasonably foreseeable impacts of supplying water to the proposed project. The County has also identified alternative sources of water supply, in the short-term as well as the long-term. Notwithstanding some uncertainty, as described in this section, there is a reasonable likelihood that the project's water supply will be available and adequate for project buildout. As shown on Draft EIR Table 6.14-8, an immediate supply is available for at least the first four to five years of activity. A secondary supply has also been

identified that would extend the initial supply through approximately 2020. A long-term supply has been identified that is being actively pursued in accordance with the WFA. The known probable effects of this supply, as well as the initial supplies, have been fully evaluated in other sections of the Draft EIR and Appendix H. Finally, alternative supplies have been identified that could eliminate infrastructure limitations on the initial supply, permitting it to be used for a longer period of time, and two American River long-term alternative options have been identified in the event problems develop with the preferred long-term supply option. (DEIR, p. 6.14-35.)

Although there is a very low likelihood that curtailment of the initial supply or long-term or buildout supply would occur, because uncertainties remain, and consistent with the Court's direction, this analysis includes consideration of the potential environmental effects of water supply curtailment. As noted above, the likelihood of permanent curtailment occurring is remote. Once developed, barring a major shift in climate or policy or the future application of the California water law principles described earlier in a manner significantly more restrictive than presently applied, it is assumed that the water supply would continue to flow to PCWA without interruption, consistent with its contract with Reclamation and PCWA's MFP water rights. Should any type of curtailment occur relative to the sources listed above, PCWA has approved of reliance on the other sources of water supplies already guaranteed and through other pipeline routes shown in Figure 2-9. In addition, the proposed project could install and use groundwater until surface water supplies were provided to the Plan Area. Therefore, the proposed project's contribution to cumulative environmental impacts from curtailment would not be considerable and would be *less than significant*. (DEIR, pp. 6.14-35 to 6.14-37.)

**Mitigation Measure:**

None required.

**Significance After Mitigation:**

Less than significant.

**Impact 6.14-4:**      **The water demand resulting from the proposed project, in combination with other development served by PCWA, could result in insufficient entitlements to surface water and exceed sustainable yield of groundwater supplies. This impact is *less than significant*. (DEIR, p. 6.14-37.)**

**Finding:**

Under CEQA, no mitigation measures are required for impacts that are less than significant.  
(Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

**Explanation:**

The analysis contained in the most recent UWMP, summarized in Draft EIR Tables 6.14-2 through Table 6.14-4 and 6.14-10, shows sufficient water entitlements to serve western Placer County at buildout. The cumulative demands during normal years can be met solely with surface water. Conjunctive use of groundwater and recycled water is required to supplement dry year curtailment of surface water supplies. Nearly 20,000 AFA of groundwater and 6,400 AFA of recycled water would be required to meet dry year demands in 2030. (DEIR, p. 6.14-37.)

Estimates for historical net groundwater withdrawal in the project site are 2,440 AFA. Upon connection to surface water, the proposed project would represent an in-lieu recharge of 2,440 AFA. After nine years, enough recharge would occur to supply the entire surface water shortfall for western Placer County during a single dry year. (DEIR, p. 6.14-37.)

Current groundwater pumping is estimated at 90,000 AFA which is near the sustainable yield of the basin estimated at 95,000 AFA. There is no current policy or management plan to limit groundwater pumping to current levels beyond General Plan policies encouraging surface water use for new developments. The General Plan polices do not act to control individual well permits or manage regional groundwater pumping. If future developments are allowed to use groundwater in excess of current groundwater withdrawal, groundwater levels would likely decline. Ultimately, if groundwater levels continued to decrease from cumulative pumping, impacts on water quality and elevated energy consumption for pumping may occur. As a result, the cumulative impact on the groundwater basin would be *potentially significant*. (DEIR, p. 6.14-37.)

However, as stated above, PCWA has sufficient water entitlements to serve western Placer County at buildout. The proposed project would result in no net increase in groundwater withdrawal if groundwater and recycled water are relied upon for the water supply for the proposed project. The proposed project's incremental contribution to impacts on groundwater supplies would not be cumulatively considerable and therefore, *less than significant*. (DEIR, p. 6.14-37.)

**Mitigation Measure:**

None required.

**Significance After Mitigation:**

Less than significant.

**Impact 6.14-5:**      **The water demand resulting from the proposed project, in combination with other development, may result in the construction or expansion of existing facilities. This impact is *potentially significant*.** (DEIR, p. 6.14-37.)

**Finding:**

Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the Final EIR.

**Explanation:**

Buildout of western Placer County would require completion of numerous PCWA-planned infrastructure projects. Several projects, such as the Sacramento River Diversion project, have not completed environmental review and are required to serve western Placer County at buildout. Current surface water supply entitlements provide PCWA with 255,400 AFA during normal years. (DEIR, p. 6.14-37.)

Infrastructure limitations for the diversion of the CVP entitlement reduce the normal year supply by 35,000 AFA for total useable entitlement of 220,400 AFA. Projected buildout demand for normal years is 250,500 AFA, requiring nearly all of the surface water entitlements. If diversion facilities for the CVP contract are not built, then cumulative normal year demand could not be met. The proposed project's potable water demand at buildout would represent approximately seven percent of the Sacramento diversion. The PVSP EIR evaluated the cumulative contribution to impacts of the new Sacramento River diversion on the CVP and State Water Projects and that discussion is summarized in Appendix H. As discussed in the Placer Vineyard Revised DEIR, the diversion of the 35,000 AFA CVP entitlement had no impact on flood control, potentially significant impact on hydropower, significant impact on Delta water quality, and significant impact on water supply reliability. The Placer Vineyards Revised Draft EIR found that the Placer Vineyards Specific Plan's incremental contribution to these impacts would not be cumulatively considerable. The proposed project's potable water demand at buildout (2,440 AFA) would represent approximately 21 percent of that of the Placer Vineyards Specific Plan (11,500 AFA). Therefore, the proposed project's incremental contribution to the cumulative impacts of the Sacramento River diversion would also not be cumulatively considerable and would be considered *less than significant*. (DEIR, p. 6.14-39.)

Prior to the completion of the diversion facilities for the CVP entitlements discussed above, water could be supplied to the proposed project via a wheeling agreement between PCWA and the City of Roseville, which is limited to a peak flow of 10 MGD. Other projects are planning to rely on this line capacity in addition to the proposed project's build-out peak demand of 7.43 MGD.<sup>24</sup> In the event these known projects were to rely solely on this supply, the 10 MGD stated in the agreement between PCWA and the City of Roseville would be greatly exceeded. This is considered a significant cumulative impact. The proposed project would demand 75 percent of the supplies available in the wheeling agreement and, therefore, the proposed project's incremental contribution to the demand on supplies available under the wheeling agreement is *cumulatively considerable*. (DEIR, p. 6.14-39.)

Compliance with the following mitigation measures would ensure the cumulative demand does not exceed current infrastructure to provide the available water supplies; therefore, mitigating the impact to a *less-than-significant level*. (DEIR, p. 6.14-39.)

**Mitigation Measure:**

6.14-5        *Implement Mitigation Measure 6.14-1.*

**Significance After Mitigation:**

Less than significant.

**O. CONCLUSION**

The Board has adopted all of the mitigation measures identified in Sections A-O above. Some of the measures identified are also within the jurisdiction and control of other agencies. To the extent any of the mitigation measures are within the jurisdiction of other agencies, the Board finds those agencies can and should implement those measures within their jurisdiction and control.

**X.**

**GROWTH INDUCING IMPACTS**

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment. (DEIR, p. 8-7.)

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of the new access to an area; a change in zoning or general plan amendment approval); or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc). These circumstances are further described below:

**Elimination of Obstacles to Growth:** This refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval. (DEIR, p. 8-7.)

**Economic Effects:** This refers to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project. (DEIR, p. 8-7.)

### **Elimination of Obstacles to Growth**

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth. (DEIR, p. 8-7.)

### Removal of Infrastructure Limitations or Provision of Capacity

The elimination of physical obstacles to growth is considered a growth-inducing effect. A number of physical constraints to growth currently exist in the vicinity of the project. In summary, the primary growth obstacles in the area today include the lack of infrastructure on the site. A portion of the site can be accessed directly from Brewer Road. There is no sewer, water, or utilities infrastructure on the site or in the areas immediately adjacent to the site. The proposed project would include road access to the site and infrastructure to serve the future population at the site. (DEIR, pp. 8-7 to 8-8.)

The proposed project includes sizing of infrastructure to serve development approved under the plan. *Development of infrastructure could precede development of certain phases of the project; that is, some infrastructure improvements would be sized to accommodate more than demand at the time of implementation.* However, in some cases, such as for storm drainage, the County may require the construction of infrastructure beyond the capacity required for the project. While this could be considered growth inducing, the areas adjacent to the project site have been identified in the County General Plan as a Future Study Area, which it has defined as an area suitable for development at urban or suburban intensities. Although the area has been identified by the County as suitable for future development, the proposed project could eliminate some of the

infrastructure constraints that are currently obstacles to growth in the southwestern Placer County area and hasten the development of the area. (DEIR, p. 8-8.)

### **Economic Effects**

In addition to the employment generated by the proposed project, additional local employment can be generated through what is commonly referred to as the "multiplier effect." The multiplier effect tends to be greater in regions with larger diverse economies due to a decrease in the requirement to import goods and services from outside the region. (DEIR, p. 8-8.)

Two different types of additional employment are tracked through the multiplier effect. *Indirect* employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with the project. Workers and students associated with University operations would spend money in the local economy, and the expenditure of that money would result in additional jobs. Indirect jobs tend to be in relatively close proximity to the places of employment and residence. (DEIR, p. 8-8.)

The multiplier effect also calculates *induced* employment. Induced employment follows the economic effect of employment beyond the expenditures of the employees within the proposed project area to include jobs created by the stream of goods and services necessary to support businesses within the proposed project. For example, when a manufacturer buys products or sells products, the employment associated with those inputs or outputs are considered *induced* employment. (DEIR, p. 8-8.)

For example, when an employee of the University, student, or resident of the Community goes out to lunch, the person who serves the project employee lunch holds a job that was *indirectly* caused by the proposed project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered *induced* employment. (DEIR, p. 8-8.)

The multiplier effect also considers the secondary effect of employee, student or resident expenditures. Thus, it includes the economic effect of the dollars spent by those employees, students and residents who support the employees of the project. (DEIR, p. 8-8.)

Increased future employment generated by resident and employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this physical space and its specific location that will determine the type and magnitude of environmental impacts of this additional economic activity. Although the economic effect can be predicted, the actual environmental implications of this type of economic growth are too speculative to predict or evaluate, since they can be spread throughout the southwestern Placer County region and beyond. (DEIR, pp. 8-8 to 8-9.)

### **Impacts of Induced Growth**

The growth induced directly and indirectly by the proposed project would contribute to a number of environmental impacts in Placer County and the nearby City of Roseville, as well as the greater regional area, including: traffic congestion; air quality deterioration; loss of agricultural land and open space; loss of habitat; and increased demand for housing. (DEIR, p. 8-9.)

Indirect and induced employment and population growth would further contribute to the loss of open space because it would encourage the conversion of undeveloped land to urban uses for additional housing and infrastructure. The construction of more roadways and infrastructure within the southwestern Placer County area would help to promote growth in the area. (DEIR, p. 8-9.)

## XI.

### PROJECT ALTERNATIVES

#### A. BASIS FOR ALTERNATIVES-FEASIBILITY ANALYSIS

##### 1. Impacts that Were Not Substantially Lessened by Mitigation in the EIR

The potential environmental impacts that would result from implementation of the proposed *Regional University Specific Plan* are summarized in Table 3-1 of the Draft EIR. In some cases, impacts that have been identified would be less than significant. In other instances, incorporation of the mitigation measures proposed in the Draft EIR would reduce the impacts to levels that are less than significant. Although the proposed Specific Plan contains standards and policies that mitigate certain impacts, no mitigation measures have been identified by the applicant to reduce the following impacts to a less than significant level. Those impacts that cannot feasibly be mitigated to a less than significant level, or for which no mitigation measures are available, would remain as significant unavoidable adverse impacts. Those impacts are listed below.

#### **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 earth-moving 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.
- 6.12-10 The proposed project could increase peak hour traffic volumes using Caltrans ramp junctions, resulting in unacceptable LOS conditions under existing plus project conditions.
- 6.12-11 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.
- 6.12-12 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.
- 6.12-13 The proposed project could increase daily traffic volumes using City of Roseville roadway segments, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-14 The proposed project could increase daily traffic volumes using Sacramento County roadway segments, resulting in unacceptable LOS conditions under cumulative plus project conditions.
- 6.12-15 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.
- 6.12-18 The proposed project could increase peak hour traffic volumes using Sutter County intersections, resulting in unacceptable LOS conditions under cumulative plus project conditions.

- 6.12-19 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.
- 6.12-20 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.
- 6.12-26 Mitigation measures implemented to reduce transportation impacts could adversely affect traffic in other jurisdictions.
- 6.12-27 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.

2. **Scope of Necessary Findings and Considerations for Project Alternatives**

These findings address whether the various alternatives lessen or avoid any of the significant unavoidable impacts associated with the project and consider the feasibility of each alternative. Under CEQA, “‘(f)feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines § 15364.) The concept of feasibility permits agency decisionmakers to consider the extent to which an alternative is able to meet some or all of a project’s objectives. In addition, the

definition of feasibility encompasses desirability to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors.

As stated in Section 15126.6, subdivision (a), of the CEQA Guidelines, the primary intent of the alternatives evaluation in an EIR is to:

...describe a range of reasonable alternatives to the project, or to the location of the project, which would 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.

(DEIR, p. 7-1.)

Further, the CEQA Guidelines state:

The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

(DEIR, p. 7-1.)

The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6(f)(1)). (DEIR, p. 7-1.)

## **B. DESCRIPTION OF PROJECT ALTERNATIVES**

### **1. Alternatives Considered and Eliminated from Further Review**

Several alternatives were considered and eliminated from further review in the EIR, as discussed below.

Consistent with CEQA, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project, or that would not meet most of the project objectives, were rejected from further consideration. (DEIR, p. 7-7.)

The proposed project would rely upon land provided without cost for the Community and University, with the net proceeds of the sale of land within the Community portion of the site to be provided for the development of the University on donated land (see Project Objectives 2 and 3). No other sites have been offered for the project. Therefore, an off-site alternative was determined to be infeasible and not considered further in this analysis. (DEIR, p. 7-7.)

The proposed project relies upon the cost-free provision of the portions of the project site devoted to University-related uses. In addition, the proposed project would rely upon an interrelationship between the Campus and Community (see Project Objective 9), which would not only contribute to the character of the Community, but would also add value to the Community that could fund the University. Lastly, the adjacency of the Community and University would allow the infrastructure to be shared by the Campus and Community, resulting in a cost savings that translates into funding for the University. For these reasons, an alternative that assumes a Campus and Community separate from one another was not further considered. (DEIR, pp. 7-7 to 7-8.)

The Placer County Transportation Planning Agency (PCTPA) is in the planning process for the Placer Parkway, an approximately 15-mile long, high-speed transportation facility, which would connect State Route (SR) 65 in western Placer County to SR 70/99 in south Sutter County. The PCTPA is considering five corridor alternative alignments at this time, two of which (Alignments 1 and 2) would pass through the Regional University Specific Plan Area. Because of the location of Placer Parkway Alignments 1 and 2, substantial changes to the land use plan for RUSP would be required in order to accommodate this roadway and access to the RUSP would be difficult. The extent of the required changes, particularly for Alignment 2, would reduce the size of the Community portion of the project and prevent the project from functioning as an integrated community. Therefore, an alternative that assumes construction of Placer Parkway for Alignments 1 and 2 were not considered in the Draft EIR. The potential for construction of Placer Parkway along Alignments 3, 4, or 5 were considered in the technical sections of this Draft EIR. (DEIR, p. 7-8.)

## **2. Alternatives Considered in EIR**

The following alternatives include scenarios intended to reduce the severity of impacts associated with the proposed project. The alternatives include scenarios with a reduction in the number of units or a reduction in the development area, or both, to demonstrate how these reductions alone or combined affect project impacts. For those alternatives where the residential component has been reduced, the commercial component generally was left unchanged and the mixed-use residential units have also remained the same as the proposed project. Leaving the commercial component unchanged is intended to ensure sufficient retail development, which would tend to keep trips internal to the project area, thereby reducing off-site traffic impacts. Although any number of alternatives could be designed that could result in the reduction or elimination of project impacts, a total of four representative alternatives, including a Sacramento Area Council

of Governments (SACOG) Blueprint Alternative, are evaluated in this Draft EIR. Following is a description of the project alternatives. (DEIR p. 7-8.)

- **No Project/No Development Alternative:** This alternative assumes that the proposed project would not occur and there would be no development of the site. This alternative assumes any existing agricultural operations that have historically occurred on the site would remain.
- **Reduced Units/Same Development Footprint:** This alternative assumes the same 1,157.50-acre development footprint as the proposed project, with a 4,500 student campus and a 25 percent reduction in the number of residential units. The commercial component would remain the same as described for the proposed project and the residential component within the mixed-use portion would remain at 75 units. With the above assumptions, the number of units within the community portion of the site would be reduced to approximately 2,367 and the housing on the campus would be reduced to 867 units. Therefore, the total number of units under this alternative would be 3,309.
- **Reduced Units/Reduced Development Footprint:** This alternative provides for a reduced footprint of development by applying a 400-foot agricultural buffer along the northern, southern, and western boundaries of the project site. The development footprint for this alternative would be 665.7 acres, compared to 912.2 acres for the proposed project (both of which exclude open space and agricultural buffers). A conceptual land use plan for this alternative was developed to provide the same intensity (same overall *dwelling units per acre*) of development as the proposed project; however, because the area to be developed would be reduced, the overall unit count would also be reduced. This alternative would include 3,364 residential units. As with the Reduced Units/Same Development Footprint Alternative, the commercial component would be the same as that described for the proposed project. It is assumed that the University would continue to be a 6,000 student campus, but the density of development would have to be increased to be accommodated within the reduced development area.
- **Same Units/Reduced Development Footprint:** This alternative assumes the incorporation of the 400-foot agricultural buffer as described under the Reduced Units/Reduced Development Footprint Alternative, which would result in the same development area of 821 acres. However, this alternative would include the same amount of development as the proposed project. Because the development area would be reduced under this alternative, the overall density of development would have to be increased. The overall density of residential development in the Community portion of the project area would increase from an average of 10 dwelling units per acre to 16.5 dwelling units per acre. The commercial component would remain the same as

the proposed project, and the University is assumed to accommodate 6,000 students.

- **SACOG Units/Same Development Footprint:** This alternative is intended to be consistent with SACOG's Blueprint assumptions, which includes higher density, compact mixed-use development. The development area (footprint) under this alternative would remain the same as for the proposed project. Overall, residential development in the Community under this alternative is assumed to be 18.4 du/ac (approximately 1.8 times that of the proposed project). In order to accommodate the increased population associated with the increased development intensity, this alternative would also include additional area set aside for parks and an additional school site. Based on the density and the above assumptions, this alternative would include approximately 5,414 residential units in the Community portion of the project area. The assumptions for the amount of commercial, the number of units within the mixed-use area, and the campus development would be the same as that for the proposed project.

(DEIR, pp. 7-8 to 7-9.)

Each of the alternatives is described in more detail and analyzed below.

### **NO PROJECT/NO DEVELOPMENT ALTERNATIVE**

#### **1. Description**

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative. (CEQA Guidelines Section 15126.6(e)(1)). The No Project/No Development Alternative describes an alternative in which no development would occur on the project site and the uses on the site would remain the same as under existing conditions. Under the No Project/No Development Alternative, the project site would likely continue to be used for agricultural production and open space. The site-specific impacts of the No Project/No Development alternative are best described by the existing conditions presented in the environmental setting sections of Chapter 6 of the Draft EIR. (DEIR, pp. 7-9 to 7-10.)

#### **2. Analysis of the No Project Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

The No Project/No Development alternative would produce no changes on the project site, effectively eliminating those project impacts discussed in the EIR. Because the site would remain in its current condition, there would be no environmental impacts associated with introducing buildings and people into an area that is currently undeveloped. Under the No Project/No Development Alternative, there would be no change in the existing visual environment. No light sources would be created and there would be no change to the existing visual character of the project site. There would be no

increase in air pollutants associated with project construction nor an increase in pollutants associated with more vehicles accessing the area. There would be no impacts to biological resources without development of the project. In addition, the potential disturbance to any unknown subsurface cultural resources would not be an issue because the site would not be disturbed to accommodate the construction of new buildings. Any hazards associated with building design or use would not occur, nor would there be any changes to the existing drainage and water quality. The current drainage pattern would not be changed. The loss of productive agricultural land would not occur. There would be no increase in noise associated with project construction and/or any noise impacts associated with future operational activities. Greenhouse gas emissions that could contribute to global warming would remain the same. Lastly, no impact on public services and public utilities would occur under this alternative because the site would not be developed, so there would be no need for additional police or fire services, sewer capacity, potable water, schools, or parks. Under this alternative, the number of vehicles accessing the site would not change; therefore, there would be no operational impacts to the surrounding roadway network or freeway. (DEIR, pp. 7-10 to 7-11.)

### 3. Feasibility of the No Project Alternative

As described earlier in these findings, the concept of “feasibility” encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*Sequoiah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.)

The No Project/No Development Alternative would not meet any of the project objectives because the site would not be developed with any uses. Because no development would occur, the site would remain as agricultural land and open space. No university or residential and commercial uses would be developed to serve Placer County residents. This alternative would not create new employment; it would not take advantage of acreage donated for university purposes; and it would not serve to connect future adjacent projects in Placer County. Therefore, none of the project objectives would be accomplished under this alternative. (DEIR, p. 7-27.)

Notably, development of the project area is by no means contrary to the 1994 Placer County General Plan, which created a “Future Study Area” in which eventual urban development was contemplated. (See General Plan Policy Document, Part III, pp. 146-149.) Although the applicable text requires the County to consider various factors prior to approving development proposals in this area, the County believes that, in the 14 years following approval of the General Plan, excellent reasons – most notably, the chance to attract a major university to Placer County – have emerged for approving development

within the project area.<sup>8</sup> Thus, the No Project/No Development Alternative, maintained over the long-term, would be inconsistent with the General Plan.

The No Project Alternative is impractical and unrealistic in the long-term absent General Plan amendments, in the sense that the permanent preservation of status quo conditions is not consistent with the General Plan as currently written.

Despite the fact that most, if not all, of the significant impacts associated with implementation of the project would be reduced in significance under this Alternative, the implementation of the No Project/No Development Alternative would fail to achieve any of the project objectives. The No Project/No Development Alternative's desirability is not on balance with the project in terms of its economic, environmental, social and technological elements. The project is the more desirable choice for the community and the region.

The Board finds the No Project/No Development Alternative to be infeasible for the above reasons and rejects it as a viable alternative to the project.

### **REDUCED UNITS/SAME DEVELOPMENT FOOTPRINT ALTERNATIVE**

#### **1. Description**

This alternative assumes the same 1,157.5-acre development footprint as the proposed project, with a 4,500 student campus and a 25 percent reduction in the number of residential units. Draft EIR Figure 7-1 shows a conceptual land use plan and Draft EIR Table 7-2 provides a land use summary for this alternative. The commercial component would remain the same as described for the proposed project and the residential component within the mixed-use portion would remain at 75 units. With the above assumptions, the number of units within the community portion of the site would be reduced to approximately 2,442 (with the 75 Commercial Mixed-use units) and the campus would be reduced to 867. Therefore, the total number of units under this alternative would be 3,309. Residential acreage would increase by approximately 10 acres, while park acreage would decrease by the same amount. The footprint under this alternative would be the same as that of the proposed project, while the population of the site would be significantly lowered. (DEIR, p. 7-27.)

#### **2. Analysis of the Reduced Units/Same Development Footprint Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

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<sup>8/</sup> For an analysis of the consistency of the RUSP with the criteria governing development approvals in the Future Study Area, see Attachment F to the September 25, 2008, Memorandum from the County's Development Review Committee to the Planning Commission.

### Impacts Identified as being the Same or Similar to the Proposed Project

The same amount of land would be developed for University and Community uses in the Reduced Units/Same Development Footprint Alternative as the proposed project. Because this alternative would have the same footprint as the proposed project, similar impacts to site-specific environmental resources, including agricultural, biological, open space, and cultural, would occur. Because the entire site would be developed, this alternative would result in the same change of the site's character: the 25 percent reduction in population density would not substantially reduce the visual impacts of conversion of the site from agriculture. Development under this alternative would be subject to the same soils limitations as under the proposed project, as well as the same potential for exposure to hazards. Impacts to geology and hazards and human safety would also be the same because site conditions would be the same and development under this alternative would be required to comply with building codes and all regulations related to hazardous materials. It is also anticipated that development of the site would result in similar impacts to drainage, because the same proportion of the site would be developed with impervious surfaces. Because this alternative would include campus athletic facilities, including a stadium, the noise impact would be the same as the proposed project. (DEIR, pp. 7-27, 7-29.)

Although this alternative would have a reduced population compared to the proposed project, resulting in less demand for services and utilities, the physical impact due to installation of the onsite and off-site infrastructure would likely be the same as for the proposed project. While smaller fire and police stations and school sites may be sufficient to provide adequate services under this alternative, there are economies of scale in the construction of such facilities, so the actual size of the facilities may not differ substantially from that required for the project as proposed. Therefore, there would likely be a similar impact for the construction of the facilities. Similarly, the development under this alternative would require utilities infrastructure, such as water, wastewater, and recycled water pipelines, and electrical and natural gas lines. Even if the actual in-ground infrastructure, such as pipes, is smaller under this alternative, the effect of installing the infrastructure would be the same as that identified for the proposed project. (DEIR, pp. 7-29 to 7-30.)

### Impacts Identified as being Less Severe than the Proposed Project

Because the Reduced Units/Same Development Footprint Alternative would include fewer homes, the population would be reduced compared to the proposed project. As shown in Draft EIR Table 7-2, the estimated population under this alternative would be 7,565, or 75 percent of that of the proposed project. Therefore, demand for services and utilities would generally be reduced compared to the proposed project. Draft EIR Table 7-3 shows the generation of solid waste, wastewater, and air emissions, as well as water demand for this alternative, compared to the proposed project. Although the number of residential units is reduced in this alternative by 75 percent, the water demand does not indicate a proportionate reduction, which is due to the fact that lower-density residential

has a higher per-unit demand rate to account for larger landscaped areas. Therefore, while this alternative has an overall reduction in water demand compared to the proposed project, because this alternative includes a larger proportion of lower density units that have substantially higher water demand rates, its overall demand does not represent a substantial water savings over the proposed project. (DEIR, p. 7-30.)

This alternative would result in a reduced demand on services and utilities due to the reduction in the population generated. However, as discussed above, the physical facilities to provide those services would still be required for this alternative and the physical impacts of constructing those facilities would not necessarily result in a proportionate reduction in physical impacts from the construction. With regard to traffic, a reduction in the amount of development, such as that associated with this alternative, would reduce the number of vehicle and transit trips generated by the project. This would reduce the amount of vehicle traffic that would use roadways and intersections in the area. This reduction would reduce the project's contribution to potential impacts on congested roadways, but it would not eliminate any impacts. In addition, the reduction in trips would not be large enough to reduce the size of study area roadways or intersections projected for the proposed project. The reduction in transit demand would potentially lessen the transit impacts, but not eliminate them. Impacts associated with bicycle and pedestrian systems would be less than significant, the same as the proposed project. Because this alternative would result in a smaller population and generate fewer trips, greenhouse gas emissions would be less; thus this alternative's potential to directly contribute to global warming would be reduced compared to the proposed project. (DEIR, pp. 7-30 to 7-31.)

Overall, although this alternative would reduce the severity of some of the impacts identified for the proposed project, the significant impacts identified for the proposed project, including those related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, transportation, and noise, would also be significant under this alternative. (DEIR, p. 7-31.)

### 3. Feasibility of the Reduced Units/Same Development Footprint Alternative

CEQA requires that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would *substantially lessen* the significant environmental effects of such projects." (Pub. Resources Code, § 21002, emphasis added.)

The Reduced Units/Same Development Footprint Alternative would result in a reduction in the impacts associated with the proposed project, while achieving a majority of the project objectives of developing a four-year university with an adjacent mixed-use community that would help to serve the entire Placer County area. However, reducing the number of units available on the same acreage as the proposed project creates lower

population densities than planned for the project. A reduction in the population density on the site could be considered in conflict with the objectives pertaining to smart growth communities, which have higher densities.

The Board of Supervisors has received and considered expert evidence addressing the feasibility of this alternative and others. (See Technical Memorandum to Julie Hanson, KT Communities, from Tim Youmans, Janelle Santos, and Megan Quinn of Economic Planning Systems [EPS] regarding "Technical Evaluation of Regional University EIR Alternatives" ("EPS Memorandum"), October 15, 2008. The Board finds this evidence to be persuasive and thus has relied on it below, as explained where relevant.

This alternative would result in very high annual costs for homeowners above and beyond their property taxes, which would make the project uncompetitive in a regional setting in which homes elsewhere have much lower annual costs. Higher costs would also frustrate University development, and make infrastructure financing difficult. The Board also finds that the alternative is infeasible for failing to meet key project objectives, as explained below.

Although the EPS Memorandum is worth reading carefully, the following excerpt aptly summarizes the problems with Alternative 2 that make it infeasible:

Alternative 2 is infeasible for three reasons, all of which compound each other. First, the single-family per unit rate (\$2,610) in this alternative exceeds the feasibility target (\$1,870) described earlier. A greater annual special tax/assessment creates an additional burden for the homeowner. Furthermore, this burden would create a competitive disadvantage with projects in surrounding jurisdictions that require a lower level of taxes and assessments. Second, this alternative also exceeds the university services cost feasibility target. The prohibitively high annual services costs under the alternative could compromise the ability of the university to fund urban services. And third, Alternative 2 fails to meet the infrastructure cost burden feasibility target as well. As explained earlier, costs burdens at above 20 percent could erode the market feasibility of the residential products proposed. For these reasons, a reasonably prudent landowner would not proceed with this alternative, which would create unacceptable additional costs for homeowners, impose undue burdens on the University, and not be competitive in the marketplace.

(EPS Memorandum, p. 14.)

The Reduced Units/Same Development Footprint Alternative would not be consistent with Objective 6. Objective 6 states:

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.

This alternative would not provide 3,200 dwelling units on the Community portion of the project site. This alternative would also not provide diverse densities of residences, with the ultimate goal of providing densities higher than those historically developed in Placer County, as required in Objective 6. (DEIR, pp. 7-2, 7-31.)

This alternative would be less consistent with Objective 11 than the project. With less density, the use of bicycles and pedestrian trails as a means of traveling to and from schools, shopping and other congregating points is less feasible. Although bicycle and pedestrian trails could still be constructed, usage would be reduced. Additionally, reduced residential densities reduce the potential for effective transit service, bicycle and pedestrian movement, and continue to emphasize automobile use.

The Board also finds that the Reduced Units/Same Development Footprint Alternative is infeasible because it is an inefficient use of land. Such low-density development provides significantly less housing and no jobs, while still causing a number of significant environmental impacts. As such, this type of low-density residential development is undesirable, both from a marketability standpoint and from an environmental perspective.

In summary, the Board finds that the Reduced Units/Same Development Footprint Alternative is infeasible for a variety of reasons. As the EPS Memorandum explains, "a reasonably prudent landowner would not proceed with this alternative, which would create unacceptable additional costs for homeowners, impose undue burdens on the University, and not be competitive in the marketplace." In addition, the alternative represents an inefficient use of land and a potential lost opportunity to create a development consistent with smart growth principles. Such low-density development would provide significantly less housing and no jobs, while still causing a number of significant environmental impacts. For these reasons, this type of low-density residential development is undesirable from a long-term environmental perspective, which takes into the account the fact that long-term losses of agricultural and habitat lands, as well as per capita air pollution, vehicle trips, energy consumption, and greenhouse gas emissions, can be minimized through commitments to compact development patterns. For the reasons stated above, the Board finds the Reduced Units/Same Development Footprint Alternative to be infeasible and rejects it as a viable alternative to the project.

### **REDUCED UNITS/REDUCED DEVELOPMENT FOOTPRINT**

#### **1. Description**

This alternative provides for a reduced footprint of development by applying a 400-foot agricultural buffer along the northern, southern, and western boundaries of the project site. The development footprint for this alternative would be 665.7 acres. A conceptual land use plan for this alternative was developed to provide the same intensity (same overall dwelling units per acre) of development as the proposed project (see Draft EIR Figure 7-2); however, because the area to be developed would be reduced, the overall unit count would also be reduced (see Table 7-4 for the land use summary for the Reduced Units/Reduced Development Footprint Alternative). This alternative would include 3,364 residential units, while the proposed project would include 4,387 units. As with the Reduced Units/Same Development Footprint Alternative, the commercial component would be the same as that described for the proposed project. It is assumed that the University would continue to be a 6,000 student campus, but the density of development would have to be increased to be accommodated within the reduced development area. (DEIR, p. 7-31.)

2. **Analysis of the Reduced Units/Reduced Development Footprint Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

The 400-foot agricultural buffer added to the perimeter of the project would not substantially affect impacts to aesthetics. Although there is less land being developed, the visual change of the entire site converting from agricultural land and open space to urban use remains significant, the same as the proposed project. Because this alternative would also include a stadium and athletic facilities, noise associated with this alternative would also be very similar to the proposed project, although traffic noise would be reduced due to a reduction in the number of trips associated with this alternative. Impacts to geology and hazards and human safety would also be the same because site conditions would be the same and development under this alternative would be required to comply with building codes and all regulations related to hazardous materials. (DEIR, pp. 7-31, 7-33.)

The Reduced Units/Reduced Development Footprint Alternative would result in higher residential densities, but there would be no change in the amount of total development. Therefore, off-site impacts would be similar to the proposed project. (DEIR, p. 7-33.)

**Impacts Identified as being Less Severe than the Proposed Project**

Because the Reduced Units/Reduced Development Footprint Alternative would include fewer homes than the proposed project, the population would be reduced compared to the proposed project. As shown in Draft EIR Table 7-4, the estimated population under this alternative would be 7,613, or 76 percent of that of the proposed project. Therefore, demand for services and utilities would be reduced to approximately 76 percent of the demand of the proposed project. Draft EIR Table 7-5 shows the relative generation of solid waste, wastewater, and air emissions, as well as water demand for this alternative compared to the proposed project. This alternative would result in a reduced demand on services and utilities due to the reduction in the population generated. However, as

discussed above under the Reduced Units/Same Development Footprint Alternative, the physical facilities to provide those services (on and off site) would still be required for this alternative and the physical impacts of constructing those facilities would not necessarily result in a proportionate reduction in physical impacts from the construction. (DEIR, p. 7-34.)

On-site transportation effects of this alternative would be a shortening of distances between homes, shopping, employment centers, and schools, which could encourage more walking and bicycling. This could contribute to less overall vehicle miles of travel and less air pollution generated by on-site travel. (DEIR, p. 7-34.)

The reduction in the physical size of this alternative would result in less disturbance of the land, thus a reduction in the possibility of encountering unknown subsurface cultural resources. However, because the locations of any cultural resources, if present, are not known, this impact would also be significant under this alternative. (DEIR, p. 7-34.)

Because this alternative would be constructed on fewer acres than the proposed project, there would be fewer impacts related to the physical size, or footprint, of the alternative. This alternative would impact approximately 320 fewer acres of Important Farmland than the proposed project, as shown in Draft EIR Table 7-6. However, the conversion of Important Farmland under this alternative would remain significant and unavoidable. Agricultural land can also be foraging habitat for Swainson's hawk, so this alternative would have a less severe impact on Swainson's hawk than the proposed project, but would still result in a significant impact. (DEIR, p. 7-34.)

As shown in Draft EIR Table 7-7, nearly 24 fewer acres of sensitive wetland habitats would be affected by this alternative. In addition, occurrences of dwarf downingia, burrowing owl, and Swainson's hawk are entirely within the buffer area, so this alternative would eliminate potential direct impacts on these species. It is also anticipated that development of the site would result in reduced impacts to drainage, because fewer acres would be developed for this alternative, so less agricultural land would be converted to urban land developed with impervious surfaces. (DEIR, p. 7-35.)

The Reduced Units/Reduced Development Footprint Alternative would result in the same overall densities, but a reduction in the amount of total development. Nonetheless, because off-site infrastructure would still be required, off-site impacts would be similar to the proposed project. On-site transportation effects of this alternative would be a shortening of distances between homes, shopping, employment centers, and schools, which could encourage more walking and bicycling. This could contribute to less overall vehicle miles of travel and less air pollution generated by on-site travel. Because this alternative would result in a smaller population and generate fewer trips, greenhouse gas emissions would be less; thus this alternative's potential to directly contribute to global warming would be reduced compared to the proposed project. (DEIR, p. 7-35.)

This alternative would reduce the severity of most of the impacts identified for the proposed project; however, the significant impacts identified for the proposed project, including those related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, hydrology and water quality, transportation, and noise, would also be significant under this alternative. Because this alternative would be constructed on a smaller footprint, impacts on some biological resources could be avoided. (DEIR, p. 7-35.)

### 3. Feasibility of the Reduced Units/Reduced Development Footprint Alternative

The EPS Memorandum provides persuasive reasons and substantial evidence as to why this alternative is infeasible. First, Alternative 3, not unlike Alternative 2, would result in very high annual costs for homeowners above and beyond their property taxes, which would make the project uncompetitive in a regional setting in which homes elsewhere have much lower annual costs. Higher costs would also frustrate University development, and make infrastructure financing difficult.

EPS summarized its conclusions with respect to Alternative 3 as follows:

Alternative 3 is infeasible for three reasons that compound each other. First, the single-family per unit rate (\$3,000) in this alternative exceeds the feasibility target (\$1,870) described earlier. As noted earlier, a greater annual special tax/assessment creates an additional burden for the homeowner, who, given the chance, would prefer to purchase a residential unit somewhere else with lower annual out-of-pocket costs. Furthermore, this burden would create a competitive disadvantage with projects in surrounding jurisdictions offering housing with lesser annual outlays for homeowners. Second, this alternative also exceeds the university services cost feasibility target. The prohibitively high annual services costs under this alternative could compromise the ability of the university to fund urban services. And third, Alternative 3 fails to meet the infrastructure cost burden feasibility target. Costs burdens at above 20 percent could erode the market feasibility of the residential products proposed. For these reasons, a reasonably prudent landowner would not proceed with this alternative, which would create unacceptable additional costs for homeowners, impose undue burdens on the University, and not be competitive in the marketplace.

(EPS Memorandum, p. 14.)

Development of the Reduced Units/Reduced Development Footprint Alternative would coincide with a majority of the project objectives. However, the land provided cost-free for University use would be used differently than the proposed project. The inclusion of

an agricultural buffer under this alternative would decrease the development potential for the Community, which could result in a reduction in funding for the University; however, the extent to which this would affect the viability of the project is unknown. Because of this, the Reduced Units/Reduced Development Footprint Alternative could be in conflict with Objective 3 because, depending on the proceeds generated under this alternative, taxpayer funds could be required to supplement the revenue generated by the Community. Objective 3 reads as follows:

Locate the University and Community to take advantage of:

- Six hundred acres of land provided for the University campus;
- Five hundred fifty-six acres of land provided for the development of the Community, the entire net proceeds of which will fund the University, requiring no taxpayer funds;
- Adjacency to planned development (West Roseville Specific Plan);
- 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).

(DEIR, p. 2-8.) The Reduced Units/Reduced Development Footprint Alternative could be inconsistent with this objective because, depending on the proceeds generated under the alternative, as mentioned above, taxpayer funds could be required to supplement the revenue generated by the Community. To the County's knowledge, no such funds are available.

As EPS explained, "a reasonably prudent landowner would not proceed with this alternative, which would create unacceptable additional costs for homeowners, impose undue burdens on the University, and not be competitive in the marketplace." In addition, the increased buffer size required under this alternative, by reducing the amount of development that can generate revenue to subsidize the University portion of the Project, could hinder the ability of the applicants and County to attract a university campus to the property.

This alternative would also reduce the number of units available compared to the proposed project despite similar population densities. This alternative would conflict with some of the objectives pertaining to smart growth communities. (DEIR, pp. 7-35 to 7-36.)

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

#### **SAME UNITS/REDUCED DEVELOPMENT FOOTPRINT ALTERNATIVE**

1. Description

This alternative assumes the incorporation of the 400-foot agricultural buffer as that described under the Reduced Units/Reduced Development Footprint Alternative, which would result in the same development area of 821 acres. However, this alternative would include the same amount of development as the proposed project, which is shown in Draft EIR Table 7-8. A conceptual land use plan for this alternative is shown in Draft EIR Figure 7-3. Because the development area would be reduced under this alternative, the density of development would have to be increased. The overall density of residential development in the community portion of the project area would increase from an average of 10 dwelling units per acre to 16.5 dwelling units per acre and the distribution of units within the low-, medium-, and high-density residential areas would change from the proposed project. Because the number of persons per household differs with the housing density, the population of this alternative would differ from that of the proposed project. Specifically, the population rates for higher density housing are lower than generation rates for lower density housing. Because this alternative includes a larger proportion of higher density housing than the proposed project, this alternative would have a reduced population, as shown in Draft EIR Table 7-8. The commercial component would remain the same as the proposed project and the University is assumed to accommodate 6,000 students. (DEIR, p. 7-36.)

2. Analysis of the Same Units/Reduced Development Footprint Alternative's Ability to Reduce Significant Unavoidable Project Impacts

Impacts Identified as being the Same or Similar to the Proposed Project

Similar to the Reduced Units/Same Development Footprint Alternative and the Reduced Units/Reduced Development Footprint Alternative, the Same Units/Reduced Development Footprint Alternative would not produce a significant change in impacts on aesthetics, because the visual change of converting from agricultural land and open space to urban use remains significant. This alternative would include the same number of residential units and same amount of non-residential development, so noise associated with construction of this alternative would be very similar to the proposed project. Although demand for services and utilities would be somewhat reduced under this alternative, the physical impacts associated with the construction of facilities would generally be the same as those identified for the proposed project. Impacts to geology and hazards and human safety would also be the same because site conditions would be the same and development under this alternative would be required to comply with building codes and all regulations related to hazardous materials. (DEIR, p. 7-36.)

Impacts Identified as being Less Severe than the Proposed Project

This alternative would impact approximately 320 fewer acres of Important Farmland than the proposed project, the same as that identified for the Reduced Units/Reduced Development Footprint Alternative and shown in Draft EIR Table 7-6. However, the conversion of Important Farmland under this alternative would remain significant and unavoidable. Agricultural land can also be foraging habitat for Swainson's hawk, so this alternative would have a less severe impact on Swainson's hawk than the proposed project, although it would still result in a significant impact. (DEIR, p. 7-36.)

As shown in Draft EIR Table 7-7, nearly 24 fewer acres of sensitive wetland habitats would be affected by this alternative. In addition, occurrences of dwarf downingia, burrowing owl, and Swainson's hawk are entirely within the buffer area, so this alternative would eliminate potential direct impacts on these species. It is also anticipated that development of the site would result in reduced impacts to drainage, because fewer acres would be developed for this alternative, so less agricultural land would be converted to urban land developed with impervious surfaces. (DEIR, p. 7-38.)

The reduction in the physical size of this alternative would result in less disturbance of the land, thus a reduction in the possibility of encountering unknown subsurface cultural resources. However, because the locations of any cultural resources, if present, are not known, this impact would also be significant under this alternative. (DEIR, p. 7-38.)

Although this alternative would include development of the same number of residential units and other non-residential uses, this alternative would necessarily have to include more dense residential development because of the reduced footprint. As shown in Draft EIR Table 7-8, the population generated under this alternative would be less than the proposed project, because higher density housing has fewer persons per household than lower density housing. This would result in a reduction in demand on public services and utilities. Water demand, solid waste and wastewater generation, and air emissions for this alternative are compared to the proposed project in Draft EIR Table 7-9. Greenhouse gas emissions would be less under this alternative; thus this alternative's potential to contribute to global warming would be reduced compared to the proposed project. (DEIR, pp. 7-38 to 7-39.)

Although this alternative would reduce the severity of most the impacts identified for the proposed project, the significant impacts identified for the proposed project, including those related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, hydrology and water quality, transportation, and noise, would also be significant under this alternative. Because this alternative would be constructed on a smaller footprint, impacts on some biological resources could be avoided. (DEIR, p. 7-39.)

### 3. Feasibility of the Same Units/Reduced Development Footprint Alternative

The Same Units/Reduced Development Alternative, with the same number of units as the proposed project, would achieve a majority of the project objectives. This alternative would conform to the smart growth objectives of the proposed project as well as provide a four-year university for the Placer County region. The housing types (densities) would be less diverse than the proposed project, which may not achieve Objective 6, which promotes a diversity of housing types for different income levels.

As with other alternatives discussed above, the County has ample bases for rejecting the Same Units/Reduced Development Footprint Alternative – grounded both on reasoning in the EPS Memorandum and the fact that the alternative would fail to meet key project objectives.

EPS summarized its conclusions as follows:

Alternative 4 is also infeasible. As with Alternatives 2 and 3, the single-family per unit rate (\$3,370) in this alternative exceeds the feasibility target (\$1,870) described earlier. A greater annual special tax/assessment would create an additional burden for the homeowner and thus put the alternative at a substantial competitive disadvantage compared with other projects in surrounding jurisdictions. A reasonably prudent landowner would not proceed with an alternative would require homeowners to bear additional annual costs far in excess of what they would have to bear in other communities in the region. This alternative, put bluntly, would simply not be competitive in the marketplace.

(EPS Memorandum, pp. 14-15.)

As noted above, Alternative 4 is infeasible for failing to meet important project objectives. The Draft EIR explains that, although this alternative would serve most of the project objectives, the housing types (densities) would be less diverse than those of the proposed RUSP, a result that may not achieve Objective 6, which reads as follows:

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.

(DEIR, p. 2-8.) As the Draft EIR explains, this alternative would include nearly twice the number of high-density units than the proposed RUSP would. (DEIR, p. 7-36.) Although high-density units do make an efficient use of land, the inclusion of a

disproportionate amount of this housing type will reduce the diversity of the Community portion of the Specific Plan area by significantly reducing the number of single family homes. In contrast, as is evident from the EPS Memorandum, the RUSP as proposed represents a mix of land uses, including housing types, that strikes a balance between the high densities associated with smart growth principles and the financial and fiscal realities that make substantial numbers of lower density units a key piece of the overall mix.

In summary, the Board finds that the Same Units/Reduced Development Footprint Alternative is infeasible for two compelling reasons. First, as EPS explained, "A reasonably prudent landowner would not proceed with an alternative would require homeowners to bear additional annual costs far in excess of what they would have to bear in other communities in the region." Second, the proportionately higher amount of high density housing under this alternative would create a less diverse "Community" portion of the Specific Plan area.

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

**SACOG/BLEUPRINT INCREASED UNITS/SAME DEVELOPMENT FOOTPRINT ALTERNATIVE**

**1. Description**

This alternative is intended to be consistent with SACOG's Blueprint assumptions, which includes higher density, compact mixed-use development. The development area (footprint) under this alternative would remain the same as for the proposed project. A conceptual land use plan for this alternative is shown in Draft EIR Figure 7-4. Overall residential development in the Community under this alternative is assumed to be 18.4 du/ac (approximately 1.8 times that of the proposed project), which is shown in Draft EIR Table 7-10. In order to accommodate the increased population associated with the increased development intensity, this alternative would also include additional area set aside for parks use and an additional school site. Based on the density and the above assumptions, this alternative would include approximately 5,414 residential units in the community portion of the project area, with a total of 6,569 including residential development in the University. The assumptions for the amount of commercial, the number of units within the mixed-use area, and the campus development would be the same as that for the proposed project. (DEIR, p. 7-39, 7-41.)<sup>9</sup>

<sup>9</sup> The name of this alternative may wrongly suggest that the RUSP as proposed (and approved) is inconsistent with the SACOG Blueprint Plan. On September 24, 2008, SACOG Executive Director Michael McKeever wrote a letter to County Planning Director Michael Johnson stating that the RUSP as proposed "is generally consistent with the Blueprint Preferred Scenario principles in its effort to provide a mix of housing products, a compact development pattern, and transportation choice." Although Mr.

This alternative is modeled after the following principles, adopted by SACOG in December 2004:

1. Transportation choices. Developments should be designed to encourage people to sometimes walk, ride bicycles, ride the bus, ride light rail, take the train, or carpool as a way to reduce the number and length of auto trips.
2. Mixed-use development. Building homes and shops, entertainment, office and even light industrial uses near each other can create active, vital neighborhoods and also help reduce the number and length of auto trips.
3. Compact development. Creating environments that are more compactly built and use space in an efficient but aesthetic manner can encourage more walking, biking, and public transit use, and shorten auto trips.
4. Housing choice and diversity. Providing a variety of places where people can live – apartments, condominiums, townhouses, and single-family detached homes on varying lot sizes – creates opportunities for the variety of people who need them: singles, seniors, and people with special needs.
5. Use of existing assets. In urbanized areas, development on infill or vacant lands, intensification of the use of underused parcels or redevelopment can make better use of existing public infrastructure.
6. Quality design. The design details of any land use development – such as the relationship to the street, setbacks, placement of garages, sidewalks, landscaping, the aesthetics of building design, and the design of the public right-of-way – are all factors that can influence the attractiveness of living in a compact development and facilitate the ease of walking and biking to work or neighborhood services.
7. Natural resources conservation. This principle encourages the incorporation of public use open space (such as parks, town squares, trails, and greenbelts) within development projects, over and above state requirements; along with wildlife and plant habitat preservation, agricultural preservation and promotion of environment-friendly practices such as energy efficient design, water conservation, and stormwater management, and shade trees to reduce the ground temperatures in the summer.

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McKeever noted that the RUSP had approximately 1,000 fewer residential units than what is contemplated for the site under the “2050 Blueprint Scenario,” he added that “it appears that the main reason for this difference is that more land is dedicated to open space in the RUSP than in the Blueprint scenario,” and explained that “[t]his is not perceived as a conflict between the two plans; rather, such variations are expected as the RUSP is a more fine-grained planning of the site.”

2. **Analysis of the SACOG/Blueprint Increased Units/Same Development Footprint Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Impacts Identified as being the Same or Similar to the Proposed Project

The SACOG/Blueprint Increased Units/Same Development Footprint Alternative would produce the same effect on aesthetics as the proposed project. Impacts associated with the loss of undeveloped land, which include impacts to biological resources, cultural resources, and agricultural resources would be the same as the proposed project because a majority of the project site would be disturbed. Impacts to geology and hazards and human safety would also be the same because site conditions would be the same and development under this alternative would be required to comply with building codes and all regulations related to hazardous materials. It is also anticipated that development of the site would result in similar impacts to drainage because the same amount of agricultural land would be converted to impervious surfaces. Noise associated with construction and operation of this alternative would also be very similar to the proposed project. (DEIR, pp. 7-41 to 7-42.)

Impacts Identified as Being More Severe than the Proposed Project

There are several environmental impacts that would be more severe than the proposed project under the SACOG/Blueprint Increased Units/Same Development Footprint Alternative. This alternative assumes a higher density of residents (1.8 times the density of the proposed project). This would create more vehicle trips and cause a substantial increase in emissions, thus affecting the area's air quality. The increase of residents in the SACOG/Blueprint Increased Units/Same Development Footprint Alternative would also cause an increase in the needed public services, including schools, police, fire, and emergency services. Greater volumes of wastewater would also affect impacts to public utilities. This alternative would have greater water demand than the proposed project, but because higher density units demand less water per unit than low density units, the overall demand for water under this alternative would only be slightly higher than the proposed project. Water demand, and solid waste, wastewater, and air emissions for this alternative are compared to the proposed project in Draft EIR Table 7-11. (DEIR, p. 7-42.)

The SACOG/Blueprint Increased Units/Same Development Footprint Alternative would generate more off-site vehicle trips and increase demand for public transit above that associated with the proposed project. Therefore, off-site impacts would be more severe than the proposed project when evaluating performance measures such as LOS. But, similar to the Reduced Units/Reduced Development Alternative, increased development density and intensity would shorten travel distances and potentially increase travel by walking and bicycling, not to mention increasing the number of people in close proximity to transit. This alternative also has the potential benefit of housing more people in western Placer County that might otherwise locate further away. Part of the Blueprint