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**ALTERNATIVES**

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, 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.” Furthermore, Section 15126.6(f) states, “The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.”

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall 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 (CEQA Guidelines Section15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section15126.6[b]).
- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination [...] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects

of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).

- The specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

In addition, Section 15126.6(d) of the CEQA Guidelines states, “If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

## **PURPOSE OF ALTERNATIVES**

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The project alternatives need to feasibly attain most of the basic objectives of the project, but avoid or substantially lessen any of the significant effects of the project.

The following project objectives have been identified by the applicant:

- Provide a mixed-use continuing care retirement community (CCRC) of approximately 860 residential units, approximately 28,500 square feet of retail uses, and approximately 190,000 square feet of medical/professional office uses on a single, infill site in close proximity to existing compatible land uses;
- Help realize the County’s implementation of the Blueprint project of the Sacramento Area Council of Governments through the provision on a single infill site of: (1) a range of housing types, (2) mix of uses, (3) transportation choices, (4) compact development, (5) use of existing assets, and (6) quality design, all close to medical facilities and other compatible uses;
- Connect through an accessible and interconnected network of trails a mixed-use, continuing care retirement community (CCRC) to the County’s Dewitt Center, a regional park, and existing neighborhoods;
- Provide a potential opportunity for on-site affordable workforce housing units; and

- Provide through an economically feasible project a network of road connections to the surrounding Auburn community to provide alternative parallel roadway opportunities for local travelers.

Potentially significant environmental impacts of the Timberline at Auburn project include:

- **Land Use.** The proposed project would result in a potentially significant impact in regard to the project's compatibility with the Auburn Municipal Airport Land Use Compatibility Plan.
- **Biological Resources.** The proposed project would result in potentially significant impacts to special-status plants, western burrowing owl, raptors and migratory birds, special-status bat species, oak woodland communities and significant trees, and jurisdictional wetlands or other waters of the U.S.
- **Transportation and Circulation.** The proposed project would result in potentially significant impacts to short term transportation and circulation operations. Potential impacts related to construction traffic, intersections (Existing Plus Project Phase 1, Short Term Plus Project Phase 1, Short Term Plus Project Phases 1 and 2), roadway segments (Short Term Plus Project Phase 1, Short Term Plus Project Phases 1 and 2), arterials (Short Term Plus Project Phase 1, Short Term Plus Project Phases 1 and 2), lane queuing (Short Term Plus Project Phase 1, Short Term Plus Project Phases 1 and 2), emergency access and/or project access, bicycle facilities, and parking capacity would occur as a result of implementation of the proposed project.
- **Air Quality.** Implementation of the proposed project would result in significant impacts in regard to air quality. Construction activities associated with the proposed project would generate PM<sub>10</sub> emissions at a level that would exceed the Placer County Air Pollution Control District (PCAPCD) significance threshold of 82 pounds per day. In addition, the project would be located in an area of Placer County that potentially contains naturally occurring asbestos (NOA) and construction of the project could result in the release of NOA into the air. Operation of the project would create emissions of ROG and PM<sub>10</sub> that would exceed the PCAPCD significance threshold of 82 pounds per day. Mitigation measures would reduce ROG and PM<sub>10</sub> emissions associated with operation of the proposed project; however, because implementation of feasible mitigation would not reduce the project's ROG and PM<sub>10</sub> emissions below the PCAPCD's significance threshold, the project would result in a significant and unavoidable impact.
- **Noise.** Implementation of the proposed project would result in elevated noise levels due to both construction activities and operational activities. On-site operational activities that would potentially exceed County noise level standards and, therefore, result in a potentially significant impact to existing and new sensitive receptors include the following: central plant and heating, ventilating, and air conditioning (HVAC) uses; parking lot activity; loading dock activity; use of mechanical equipment; and recreational uses.

- ***Soils, Geology, and Seismicity.*** The proposed project would result in a potentially significant impact related to risks to people and structures associated with seismic activity, including surface rupture, slope instability, and/or landslides. In addition, the project would result in a potentially significant impact regarding risks associated with erosion (loss of topsoil) and/or sedimentation. Furthermore, impacts associated with loss of structural support due to liquefaction and damage from expansive soils on-site would be potentially significant.
- ***Hydrology and Water Quality.*** The proposed project would result in a potentially significant impact to the site's existing drainage pattern and surface runoff. In addition, construction-related impacts to surface water quality and operational water quality degradation associated with urban runoff from the project site would be potentially significant impacts. Furthermore, the impact related to exposure of people and structures to flood hazards on the project site would be potentially significant.
- ***Public Services and Utilities.*** Water would be supplied for the proposed project by Placer County Water Agency (PCWA). The EIR determined that because the project applicant has not received a water availability letter from PCWA ensuring that adequate water supply will be made available to serve the project, a potentially significant impact would result. Wastewater services would be supplied for the proposed project by Sewer Maintenance District #1 (SMD-1). The EIR determined that because the project applicant has not received a will-serve letter from SMD-1 ensuring that adequate wastewater services will be made available to serve the project, a potentially significant impact would result. Fire protection services for the proposed project would be provided by Placer County Fire Department/CAL FIRE. The EIR determined that because the Placer County Fire Department/CAL FIRE has not provided a will-serve letter stating that the existing fire protection services are adequate to serve the project site, a potentially significant impact would occur. Law enforcement services would be provided by the Placer County Sheriff. The EIR determined that because the provision of adequate law enforcement services would be dependent upon the authorization of funding, a potentially significant impact would result.
- ***Hazardous Materials and Hazards.*** The proposed project would result in potentially significant impacts related to past mining activity in the project area and exposure of people to asbestos (including the existing on-site asbestos cement sewer pipe) and lead-based paint.

Implementation of the mitigation measures included in this Draft EIR would reduce the above impacts to less-than-significant levels, other than the air quality, transportation and circulation, and climate change impacts noted above, for which impacts would remain significant and unavoidable.

## **ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION**

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The following section describes the alternatives considered but dismissed from further analysis in this EIR. One alternative, the Off-Site Alternative, was considered but dismissed. The major characteristics of the Off-Site Alternative are summarized below.

### **Off-Site Alternative**

Section 15126.6(f)(2)(B) of the CEQA Guidelines states, “If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reason in the EIR.” A feasible location for the proposed project that would result in substantially reduced impacts does not exist.

The CEQA Guidelines Section 15126.6(b) requires that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. The Off-Site Alternative would involve the construction of the proposed project on an alternative location. The Off-Site Alternative would locate the proposed project on other lands located within Placer County that are owned by the project applicant. However, the Off-Site Alternative location(s) would still be expected to accommodate the uses associated with the proposed project. Because the project applicant does not own a comparable property in the Placer County area, the Off-Site Alternative would not be feasible and would, therefore, be dismissed from further consideration.

It should be noted that the CEQA Guidelines state that, by definition, an alternative should avoid or substantially lessen one or more of the environmental effects of the project. Alternative locations within Placer County would generally contain characteristics similar to the proposed project site. In addition, a site with similar access to services such as the County offices and adjacent medical services would be difficult to find.

Potential alternative properties were explored, such as sites that were comparable in size, without a wetland located on-site. However, an equal area would be graded and, therefore, similar impacts would occur related to land disturbance activities. In addition, the operation of a building that is equal in square feet would result in traffic impacts that would likely be very similar, or even potentially worse than the proposed project, depending on on-site accessibility. Therefore, development of the project at an alternative location in Placer County would be expected to result in the same, or worse, impacts as compared to the proposed project. As a result, an environmentally feasible off-site location that would meet the requirements of CEQA, as well as meet the basic objectives of the project, does not exist.

## **ALTERNATIVES CONSIDERED IN THIS EIR**

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This section evaluates the alternatives considered for the proposed project, which include the following:

- No Project-No Build Alternative;
- Clustered Development Alternative; and

- Reduced Density Alternative.

CEQA requires the evaluation of the comparative impacts of the “No Project” alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the No Project Alternative “... shall discuss [...] existing conditions [...] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” (*Id.*, subd. [e][2]) “If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property’s existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build,’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.” (*Id.*, subd. [e][3][B])

Per CEQA Guideline requirements, the County has decided to evaluate a “no project” Alternative. Under the No Project Alternative, the project site would remain vacant (aside from the existing structure on-site), undeveloped land, which would not create any incompatibilities with surrounding land uses. It should be noted that because the project site is designated by the General Plan for development with urban uses, denial of the project would likely result in the proposal of another project.

In addition, the County has decided to evaluate a Clustered Development Alternative, which would include the development of the same number of units on a smaller site (reduced footprint) and would preserve the western portion of the property. Furthermore, the County has decided to evaluate a Reduced Density Alternative, which would include the development of fewer units on a smaller site.

The major characteristics of each of the alternatives, as well as corresponding impact comparisons with the proposed project, are summarized below.

### **No Project-No Build Alternative**

Under the No Project-No Build Alternative, the project site would remain vacant, undeveloped land (other than the existing single-family home on-site). The No Project-No Build Alternative would not meet any of the project objectives.

Impacts related to land use would be decreased as compared to the proposed project, if the No Project-No Build Alternative was implemented. Under the No Project-No Build Alternative, land disturbance would not occur and, therefore, the majority of environmental impacts identified for the proposed project would not occur. Because many of the impacts of concern are directly related to land disturbances, if the No Project-No Build Alternative were selected, those impacts

would not ensue. Furthermore, impacts not directly related to land disturbance activities would most likely not occur.

Traffic and related concerns, such as air quality and noise issues related to construction and operational activities on the project site, would not occur if the No Project-No Build Alternative were selected. If the proposed project was not developed, people would not be potentially exposed to hazards in regard to past mining activity in the project area, as well as the exposure of people to asbestos and lead-based paint. Proposed structures would not be subject to soil, geology, and seismicity impacts such as liquefaction and groundshaking because structures would not exist. The No Project-No Build Alternative would not increase demand for public services such as police and fire, because there would be no purpose for pedestrians to congregate at the project site. In addition, the No Project-No Build Alternative would not require the construction of a new off-site sewer alignment with an upsized pipeline. Furthermore, the site would not be irreversibly converted to an urban use under the No Project-No Build Alternative, thereby eliminating visual impacts.

Decreased (or no) impacts would result in the following issue areas under the No Project-No Build Alternative:

- Land Use;
- Biological Resources;
- Visual Resources;
- Transportation and Circulation;
- Air Quality;
- Noise;
- Soils, Geology, and Seismicity;
- Hydrology and Water Quality;
- Public Services and Utilities;
- Hazardous Materials and Hazards; and
- Mineral Resources.

### **Clustered Development Alternative**

The Clustered Development Alternative would include the same number of residential units (858), and the same square footage for commercial uses as the proposed project. The Clustered Development Alternative would include the elimination of all construction (minus passive use) on the western portion of the proposed project site and would instead include the units lost (56) in the central portion of the site by adding a three-story independent living building and making up the rest in residential villas. It should be noted that the construction of off-site sewer infrastructure would still be required under the Clustered Development Alternative.



## Land Use

The proposed project would require amendments to the Placer County General Plan (PCGP) and Auburn Bowman Community Plan (ABCP) land use designations for the site, as well as a rezone of the site. Because the Clustered Development Alternative would include buildout of the site with the same uses as the proposed project, approval of the abovementioned entitlements would still be required with the Clustered Development Alternative. In addition, the Clustered Development Alternative would still be likely to result in a potentially significant impact in regard to compatibility with the Auburn Municipal Airport Land Use Compatibility Plan, similar to the proposed project. However, the Clustered Development Alternative would not include land disturbance on the western portion of the project site; therefore, potential land use incompatibility issues could be avoided in that portion of the project site. Therefore, land use impacts under the Clustered Development Alternative would be slightly reduced, as compared to the proposed project.

## Biological Resources

The Clustered Development Alternative, like the proposed project, would result in potential impacts in regard to biological resources on the project site. The proposed project would result in potential impacts to special status plants on-site, as well as western burrowing owl, raptors and migratory birds, and special-status bats. In addition, the proposed project would potentially impact oak woodlands and jurisdictional wetlands or other waters of the U.S. Under Clustered Development Alternative, potential impacts to special-status plants, wildlife, oak woodlands, and jurisdictional wetlands or other waters of the U.S would still occur. Due to the fact that the western portion of the project site would not be developed under this Clustered Development Alternative, the alternative would allow for the preservation of an additional eight acres of on-site oak woodlands, thereby decreasing direct impacts to oak woodlands, and indirectly decreasing impacts to wildlife that would utilize the oak woodland as habitat, foraging grounds, nesting, or other purposes. It should be noted that oak woodland communities and significant trees that would be impacted by the off-site sewer alignment would be impacted under this alternative, like the proposed project, as the off-site sewer infrastructure would still be required. Overall, impacts to biological resources under the Clustered Development Alternative would be less, as compared to the proposed project.

## Visual Resources

As with the proposed project, under the Clustered Development Alternative, the change in the site from a somewhat rural to an urban environment would constitute a permanent alteration of the existing visual character of the project area. The Clustered Development Alternative, like the proposed project, would result in less-than-significant impacts related to visual resources, due to the fact that this alternative would be required to be consistent with the goals and policies found in the PCGP and the ABCP for commercial development, and adhere to the County requirement that any project of this nature be subject to a Design Review Agreement. In addition, both the Clustered Development Alternative and the proposed project would introduce new sources of light and glare where none currently exist; however, because the Reduced Density Alternative would decrease the acreage to be developed, new sources of light and glare would be decreased

as compared to the proposed project. Overall, impacts related to visual resources would be similar under both the Clustered Development Alternative and the proposed project.

### Transportation and Circulation

The Clustered Development Alternative, like the proposed project, would be expected to create a potentially significant impact during construction activities. Under the Clustered Development Alternative, the number of residential units and the square footage of commercial area would be the same as the proposed project; therefore, the project's generation of new vehicle trips would be expected to be the same. In addition, the access points to the project site would remain the same. It was determined that the proposed project would result in potentially significant impacts in the following areas, with some impacts remaining significant and unavoidable after implementation of feasible mitigation measures: impacts to intersections under Existing Plus Project Phase 1 conditions; impacts to intersections, roadway segments, and lane queuing under Short Term Plus Project Phase 1 conditions; and impacts to intersections, roadway segments, and lane queuing under the Short Term Plus Project Phases 1 and 2 conditions.

Due to the frequency and multitude of the local and regional transit service routes within the study area and project vicinity, implementation of the proposed project and/or the Clustered Development Alternative is not anticipated result in significant impacts to transit services. The proposed project is expected to increase ridership on the existing transit routes. The Clustered Development Alternative would include the same number of residents to utilize the transit routes; therefore, this alternative would also be expected to increase ridership on the existing transit routes.

Preliminary designs for the proposed project, as well as the Clustered Development Alternative, include the construction of new sidewalks along the newly constructed on-site roadway network, and along the planned roadway extensions including the following: the construction of Richardson Drive between Dry Creek Road and Bell Road, Quartz Drive, and Education Street. The proposed sidewalk infrastructure would connect the existing residential sidewalks and neighborhoods around the project site, which would increase the amount of available pedestrian facilities in the area. The Clustered Development Alternative would not alter the proposed design of the new sidewalks on-site. Therefore, potential impacts to pedestrian and bicycle facilities would remain unchanged with the Clustered Development Alternative, as compared to the proposed project.

The proposed project would include the construction of 2,702 parking spaces, which would exceed the number of required spaces (2,605 spaces) based on land use. Because the Clustered Development Alternative would include the same number of residents on-site, the corresponding required parking spaces would be the same.

Because the Clustered Development Alternative would include the same number of residential units and commercial square footage, the impacts under this alternative would be expected to be the same as those associated with the proposed project.

## Air Quality

Under the Clustered Development Alternative, construction-related air quality impacts (creation of fugitive particulate matter emissions and potential release of naturally occurring asbestos (NOA)) would still be expected to occur and, similar to the proposed project, mitigation measures would reduce the impact to a less-than-significant level. In addition, under the Clustered Development Alternative, the total number of project-related vehicle trips would be expected to be the same as with implementation of the proposed project because this alternative would include the same number of residential units and the same commercial square footage. Consequently, emissions of criteria pollutants from automobiles would be expected to be similar.

The air quality analysis performed for the proposed project determined that the proposed project would result in a significant and unavoidable impact related to long-term increases of criteria air pollutants. Emissions of reactive organic gases (ROG) and particulate matter (PM<sub>10</sub>) associated with the proposed project would exceed the 82 pounds per day significance threshold of the Placer County Air Pollution District (PCAPCD) by creating approximately 93 pounds per day of ROG and approximately 87 pounds per day of PM<sub>10</sub>. Although the Clustered Development Alternative would result in lower levels of ROG and PM<sub>10</sub> emissions, the emissions would still be expected to exceed the PCAPCD threshold of 82 pounds per day for ROG and PM<sub>10</sub>, causing the impact to remain significant and unavoidable. Therefore, the Reduced Density Alternative would result in slightly reduced impacts to air quality, as compared to the proposed project, but a significant and unavoidable impact would be expected to remain.

## Noise

The Clustered Development Alternative, like the proposed project, would result in potentially significant impacts related to noise levels associated with construction activities, as well as the addition of on-site noise associated with operational activities. The operation of the on-site features of the proposed project, such as loading docks, HVAC units, emergency generators, and parking lots, would generate increased noise levels. The predicted increases to the existing noise levels would exceed County noise standards, but impacts would be reduced to a less-than-significant level with the implementation of the required mitigation measures. The Clustered Development Alternative would be expected to have similar noise impacts, as compared to the proposed project, although it should be noted that this Alternative would not include construction in the western portion of the project site, thereby reducing construction-related noise impacts to receptors to the west of the project site. Overall the Clustered Development Alternative would have similar noise-related impacts, as compared to the proposed project.

## Soils, Geology, and Seismicity

Soils found on the project site were not specifically tested for shrink-swell capacity; however, highly expansive soils are located through the County. Therefore, structural failure due to expansive soils is a possibility and further analysis would be required if the proposed project were to be implemented. Likewise, soils throughout the County have the potential to experience liquefaction, and the potential for liquefaction on the site was not previously addressed. The Clustered Development Alternative, like the proposed project, would result in a potentially

significant impact in regard to expansive soils and the potential for liquefaction because buildings would still be constructed on-site. In addition, similar to the proposed project, the Clustered Development Alternative would result in potentially significant impacts related to risks to people and structures associated with seismic activity, including surface rupture, slope instability, and/or landslides, and risks associated with erosion (loss of topsoil) and/or sedimentation. It should be noted that, as for the proposed project, these impacts under the Clustered Development Alternative would be reduced to a less-than-significant level with implementation of required mitigation. Although the Clustered Development Alternative's soils, geology, and seismicity impacts would be similar to the proposed project's impacts, because potential impacts regarding soils, geology, and seismicity are directly related to land disturbance areas and the land disturbance area would be reduced under this alternative, the Clustered Development Alternative would result in slightly reduced impacts to soils, geology, and seismicity.

### Hydrology and Water Quality

The proposed project would result in a potentially significant impact to the site's existing drainage pattern and surface runoff. In addition, construction-related impacts to surface water quality and operational water quality degradation associated with urban runoff from the project site would be potentially significant impacts. Furthermore, the impact related to exposure of people and structures to flood hazards on the project site would be potentially significant. The Clustered Development Alternative would still be expected to result in potentially significant construction-related impacts to surface water quality, as well as operational water quality degradation associated with urban runoff from the project site. However, because the Clustered Development Alternative would include development on fewer acres than the proposed project, the amount of impervious surfaces that would be created and, in turn, the amount of stormwater runoff, would be reduced under this alternative. In addition, the Clustered Development Alternative would still be expected to result in potentially significant impacts related to the site's drainage pattern and the exposure of people and structures to flood hazards on the project site. The number of structures on the project site would be decreased, however, so impacts would be reduced. Overall, the Clustered Development Alternative would result in less of an impact related to hydrology and water quality, as compared to the proposed project.

### Public Services and Utilities

Both the Clustered Development Alternative and the proposed project would result in a potentially significant impact associated with increased demand for water supply, wastewater disposal, school services and facilities, fire protection and emergency medical services, and law enforcement services. It should be noted that construction of the off-site sewer infrastructure would still be necessary under the Clustered Development Alternative in order to provide adequate wastewater disposal for the site. The proposed project and the Clustered Development Alternative would be expected to generate the same approximate number of new residents to impact these services. Therefore, under the Clustered Development Alternative, impacts to public services and utilities would be similar to the proposed project.

### Hazardous Materials and Hazards

The Clustered Development Alternative, like the proposed project, would result in potentially significant impacts in regard to past mining activity in the project area, as well as the exposure of people to asbestos (including asbestos from an existing on-site asbestos cement sewer pipe) and lead-based paint. The potential presence of asbestos and/or lead-based paint within the existing on-site residence could result in potential hazards to humans during the demolition of the structure, which would be necessary for implementation of the proposed project or this alternative. Because the Clustered Development Alternative would include the demolition of the on-site structure, the potential impacts related to exposure to asbestos and lead-based paints would remain generally unchanged as compared to the proposed project. In addition, the possibility exists that additional excavations have previously occurred within the project site, or that mine shafts could extend into the project site. Mine entrances and shafts could result in geologic instability, which could create hazards to buildings and persons. Implementation of the Clustered Development Alternative would not eliminate the possibility that mine shafts could extend into the project site. Although the land disturbance area under the Clustered Development Alternative would be less than the proposed project, mine shafts may be located throughout the property. Therefore, the Clustered Development Alternative would result in impacts similar to those of the proposed project.

### Mineral Resources

The project site may have been a past site of mining activities. Mining activities have been discontinued in the project area and neither the proposed project nor the Clustered Development Alternative would locate buildings in the vicinity of the identified mine features. Implementation of the proposed project would result in a less-than-significant impact to known State, regional, or locally valuable resources as identified in the Placer County General. Impacts to mineral resources under this alternative would also be expected to be less-than-significant and, overall, would be similar to the impacts of the proposed project.

### **Reduced Density Alternative**

The Reduced Density Alternative would include the elimination of 100 independent living units by eliminating Buildings C5 and C6 and reducing Building C2 from three stories to two stories. 15 detached villas would be removed from the western and southern perimeter, and 12 of the 15 would instead be inserted into the old location of Buildings C5 and C6 (See Figure 16-2).



The net reduction of units under the Reduced Density Alternative is 103. In addition, the lake would be reduced in size. The reduction in residential units and the size of the lake would allow for approximately 10 acres of on-site oak woodlands to be preserved, as compared to the proposed project. It should be noted that the construction of off-site sewer infrastructure would still be required under the Clustered Development Alternative.

### Land Use

The proposed project would require amendments to the Placer County General Plan (PCGP) and Auburn Bowman Community Plan (ABCP) land use designations for the site, as well as a rezone of the site. Because the Reduced Density Alternative includes buildout of the site with the same uses as the proposed project, approval of the abovementioned entitlements would still be required with the Reduced Density Alternative. In addition, the Reduced Density Alternative would still be likely to result in a potentially significant impact in regard to compatibility with the Auburn Municipal Airport Land Use Compatibility Plan, similar to the proposed project. Although the Reduced Density Alternative is very similar to the proposed project, the density and intensity of land uses would be reduced under the Reduced Density Alternative, therefore, land use impacts under the Reduced Density Alternative would be slightly reduced.

### Biological Resources

The Reduced Density Alternative, like the proposed project, would result in potential impacts in regard to biological resources on the project site. The proposed project would result in potential impacts to special status plants on-site, as well as western burrowing owl, raptors and migratory birds, and special-status bats. In addition, the proposed project would potentially impact oak woodlands and jurisdictional wetlands or other waters of the U.S. Under the Reduced Density Alternative, potential impacts to special-status plants, wildlife, and jurisdictional wetlands or other waters of the U.S would still occur. However, because the proposed on-site lake would be reduced in size, the Reduced Density Alternative would allow for the preservation of an additional four acres of oak woodlands on-site, thereby decreasing direct impacts to oak woodlands, and indirectly decreasing impacts to wildlife that would utilize the oak woodland as habitat, foraging grounds, nesting, or other purposes. It should be noted that the oak woodland communities and significant trees that would be impacted by the off-site sewer alignment would be impacted under this alternative, like the proposed project, as the off-site sewer infrastructure would still be required. Because the Reduced Density Alternative would decrease the overall square footage of disturbed area, and because four additional acres of on-site oak woodlands would be preserved, impacts to biological resources would be decreased with the Reduced Density Alternative, as compared to the proposed project.

### Visual Resources

As with the proposed project, under the Reduced Density Alternative, the change in the site from a somewhat rural to an urban environment would constitute a permanent alteration of the existing visual character of the project area. The Reduced Density Alternative, like the proposed project, would result in less-than-significant impacts related to visual resources, due to the fact that this alternative would be required to be consistent with the goals and policies found in the PCGP and

the ABCP for commercial development, and adhere to the County requirement that any project of this nature be subject to a Design Review Agreement. In addition, both the Reduced Density Alternative and the proposed project would introduce new sources of light and glare where none currently exist; however, because the Reduced Density Alternative would decrease the number of buildings on-site, and the acreage to be developed, new sources of light and glare would be decreased as compared to the proposed project. Although the proposed project would not result in a potentially significant impact to visual resources, the Reduced Density Alternative would result in even fewer impacts to visual resources, as compared to the proposed project.

Transportation and Circulation

The Reduced Density Alternative, like the proposed project, would create a potentially significant impact during construction activities. Under the Reduced Density Alternative, the reduction in residential square footage would result in a decrease of approximately 281 new vehicle trips (See Table 16-1).

<b>Table 16-1</b>				
<b>Reduced Density Alternative Trip Generation versus Proposed Project Trip Generation for CCRC Vehicle Trips</b>				
Land Use Category	Unit	Daily Trip Rate/Unit	Units	Daily Trips
<b>Proposed Project</b>				
Continuing Care Retirement Community	DU	2.81	858.0	2,411
<b>Reduced Density Alternative</b>				
Continuing Care Retirement Community	DU	2.81	758.0	2,130

During operational phases, the Reduced Density Alternative would most likely result in potentially significant impacts in regard to transportation and circulation. However, the number of trips generated would decrease, due the associated decrease in residential units on the project site. Trips to the medical/professional office buildings in the eastern portion of the site would remain generally unchanged.

Due to the frequency and multitude of the local and regional transit service routes within the study area and project vicinity, implementation of the proposed project and/or the Reduced Density Alternative is not anticipated result in significant impacts to transit services. The proposed project is expected to increase ridership on the existing transit routes. The Reduced Density Alternative would provide fewer residents to utilize the transit routes. Therefore, in regard to potential impacts to existing transit services, the Alternative would have an increased impact, as compared to the proposed project.

Preliminary designs for the proposed project, as well as the Reduced Density Alternative, include the construction of new sidewalks along the newly constructed on-site roadway network, and along the planned roadway extensions including: the construction of Richardson Drive between Dry Creek Road and Bell Road, Quartz Drive, and Education Street. The proposed sidewalk infrastructure would connect the existing residential sidewalks and neighborhoods around the

project site, which would increase the amount of available pedestrian facilities in the area. The Reduced Density Alternative would not alter the proposed design of the new sidewalks on-site. Therefore, potential impacts to pedestrian and bicycle facilities would remain unchanged with the Reduced Density Alternative, as compared to the proposed project.

The proposed project would include the construction of 2,702 parking spaces, which would exceed the number of required spaces (2,605 spaces) based on land use. Because the Reduced Density Alternative would reduce the number of residents on-site, the corresponding required parking spaces would also be reduced. However, the Reduced Density Alternative would adhere to parking space requirements. The Reduced Density Alternative, like the proposed project, would result in a less-than-significant impact to parking capacity.

Overall, because the Reduced Density Alternative would lessen trips to the proposed project site due to a decrease in square footage, and potential impacts in regard to transportation and circulation would be reduced, as compared to the proposed project.

### Air Quality

Under the Reduced Density Alternative, construction-related air quality impacts (creation of fugitive particulate matter emissions and potential release of naturally occurring asbestos (NOA)) would be slightly reduced due to less building construction. However, construction-related impacts would still be expected to occur and, similar to the proposed project, mitigation measures would reduce the impact to a less-than-significant level. In addition, under the Reduced Density Alternative, the reduction in square footage would result in a decrease in the total number of project-related vehicle trips. As a result, emissions of criteria pollutants from commercial uses and automobiles would be reduced. However, the air quality analysis performed for the proposed project determined that the proposed project would result in a significant and unavoidable impact related to long-term increases of criteria air pollutants. Emissions of reactive organic gases ROG and PM<sub>10</sub> associated with the proposed project would exceed the 82 pounds per day significance threshold of the PCAPCD by creating approximately 93 pounds per day of ROG and approximately 87 pounds per day of PM<sub>10</sub>. Although the Reduced Density Alternative would result in lower levels of ROG and PM<sub>10</sub> emissions, the emissions would still be expected to exceed the PCAPCD threshold of 82 pounds per day for ROG and PM<sub>10</sub>, causing the impact to remain significant and unavoidable. Therefore, the Reduced Density Alternative would result in slightly reduced impacts to air quality, as compared to the proposed project, but a significant and unavoidable impact would be expected to remain.

### Noise

The proposed project would result in potentially significant impacts related to noise levels associated with construction activities, as well as the addition of on-site noise associated with operational activities. The operation of the on-site features of the proposed project, such as loading docks, HVAC units, emergency generators, and parking lots, would generate increased noise levels. The predicted increases to the existing noise levels would exceed County noise standards, but impacts would be reduced to a less-than-significant level with the implementation of the required mitigation measures. The Reduced Density Alternative would reduce the total

number of vehicle trips, which would reduce project-related vehicle noise. In addition, a reduction in the total number of residential units to be developed could reduce the amount of construction time, thereby slightly reducing construction-related noise impacts, which were found to be less-than-significant for the proposed project. Furthermore, because the Reduced Density Alternative would include the operation of fewer units on-site, the Alternative would result in slightly less intense noise impacts. Therefore, the Reduced Density Alternative would be expected to reduce impacts related to noise, as compared to the proposed project.

### Soils, Geology, and Seismicity

Soils found on the project site were not specifically tested for shrink-swell capacity; however, highly expansive soils are located through the County. Therefore, structural failure due to expansive soils is a possibility and further analysis would be required if the proposed project were to be implemented. Likewise, soils throughout the County have the potential to experience liquefaction, and the potential for liquefaction on the site was not previously addressed. The Reduced Density Alternative, like the proposed project, would result in a potentially significant impact in regard to expansive soils and the potential for liquefaction because buildings would still be constructed on-site. In addition, similar to the proposed project, the Reduced Density Alternative would result in potentially significant impacts related to risks to people and structures associated with seismic activity, including surface rupture, slope instability, and/or landslides, and risks associated with erosion (loss of topsoil) and/or sedimentation. It should be noted that, as for the proposed project, these impacts under the Reduced Density Alternative would be reduced to a less-than-significant level with implementation of required mitigation. Although the Reduced Density Alternative's soils, geology, and seismicity impacts would be similar to the proposed project's impacts, because potential impacts regarding soils, geology, and seismicity are directly related to land disturbance areas and the land disturbance area would be reduced under this alternative, the Reduced Density Alternative would result in slightly reduced impacts to soils, geology, and seismicity.

### Hydrology and Water Quality

The proposed project would result in a potentially significant impact to the site's existing drainage pattern and surface runoff. In addition, construction-related impacts to surface water quality and operational water quality degradation associated with urban runoff from the project site would be potentially significant impacts. Furthermore, the impact related to exposure of people and structures to flood hazards on the project site would be potentially significant. The Reduced Density Alternative would still be expected to result in potentially significant construction-related impacts to surface water quality, as well as operational water quality degradation associated with urban runoff from the project site. However, because the Reduced Density Alternative would include development on fewer acres than the proposed project, the amount of impervious surfaces that would be created and, in turn, the amount of stormwater runoff, would be reduced under this alternative. In addition, the Reduced Density Alternative would still be expected to result in potentially significant impacts related to the site's drainage pattern and the exposure of people and structures to flood hazards on the project site. The number of people and structures on the project site would be decreased, however, so impacts

would be reduced. Overall, the Reduced Density Alternative would result in slightly less of an impact related to hydrology and water quality, as compared to the proposed project.

### Public Services and Utilities

Both the Reduced Density Alternative and the proposed project would result in a potentially significant impact associated with increased demand for water supply, wastewater disposal, school services and facilities, fire protection and emergency medical services, and law enforcement services. Both scenarios would generate a sufficient number of new residents to impact these services. It should be noted that construction of the off-site sewer infrastructure would still be necessary under the Reduced Density Alternative in order to provide adequate wastewater disposal for the site. However, the Reduced Density Alternative would include fewer residences than the proposed project; therefore, fewer new residents would be expected to be generated, and impacts to public services and utilities would be slightly less than under the proposed project.

### Hazardous Materials and Hazards

The Reduced Density Alternative, like the proposed project, would result in potentially significant impacts in regard to past mining activity in the project area, as well as the exposure of people to asbestos (including asbestos from an existing on-site asbestos cement sewer pipe) and lead-based paint. The potential presence of asbestos and/or lead-based paint within the existing on-site residence could result in potential hazards to humans during the demolition of the structure, which would be necessary for implementation of the proposed project or this alternative. Because the Reduced Density Alternative would include the demolition of the on-site structure, the potential impacts related to exposure to asbestos and lead-based paints would remain generally unchanged as compared to the proposed project. In addition, the possibility exists that additional excavations have previously occurred within the project site, or that mine shafts could extend into the project site. Mine entrances and shafts could result in geologic instability, which could create hazards to buildings and persons. Implementation of the Reduced Density Alternative would not eliminate the possibility that mine shafts could extend into the project site. Although the land disturbance area under the Reduced Density Alternative would be less than the proposed project, mine shafts may be located throughout the property.

Potential impacts with both the Reduced Density Alternative and the proposed project would be less-than-significant in regard to compliance with the land use requirements of the Auburn Land Use Compatibility Plan (ALUCP) for the Auburn Municipal Airport. Safety compatibility with the Airport Land Use Plan is determined by assessing the noise compatibility, residential density, population intensity, open land requirement, airspace protection, and overflights. Because the Alternative would reduce residential density, impacts related to the compliance with the land use requirements of the (ALUCP) for the Auburn Municipal Airport would be reduced, as compared to the proposed project.

Overall, the Reduced Density Alternative would result in fewer impacts related to hazards and hazardous materials, as compared to the proposed project.

Mineral Resources

The project site may have been a past site of mining activities. Mining activities have been discontinued in the project area and neither the proposed project nor the Reduced Density Alternative would locate buildings in the vicinity of the identified mine features. Implementation of the proposed project would result in a less-than-significant impact to known State, regional, or locally valuable resources as identified in the Placer County General. Impacts to mineral resources under this alternative would also be expected to be less-than-significant and, overall, would be similar to the impacts of the proposed project.

Table 16-2 summarizes the level of significance of the impacts for the proposed project and each of the project alternatives.

<b>Table 16-2 Environmental Impacts of the Proposed Project and Project Alternatives</b>				
<b>Impact</b>	<b>Proposed Project</b>	<b>No Project – No Build Alternative</b>	<b>Clustered Development Alternative</b>	<b>Reduced Density Alternative</b>
<b>Land Use</b>	Potentially Significant	Less	Less	Less
<b>Biological Resources</b>	Potentially Significant	Less	Less	Less
<b>Visual Resources</b>	Less-Than-Significant	Less	Equal	Less
<b>Transportation and Circulation</b>	Potentially Significant	Less	Equal*	Less*
<b>Air Quality</b>	Potentially Significant	Less	Less*	Less*
<b>Noise</b>	Potentially Significant	Less	Equal	Less
<b>Soils, Geology, and Seismicity</b>	Potentially Significant	Less	Less	Less
<b>Hydrology and Water Quality</b>	Potentially Significant	Less	Less	Less
<b>Public Services and Utilities</b>	Potentially Significant	Less	Equal	Less
<b>Hazards and Hazardous Materials</b>	Potentially Significant	Less	Equal	Equal
<b>Mineral Resources</b>	Less-Than-Significant	Less	Equal	Equal
*Although the alternative would reduce potential impacts, the overall result would remain “Significant and Unavoidable.”				
Less = fewer impacts than proposed project Equal = impacts equal to proposed project More = more impacts than proposed project				

## ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” It should be noted that, in the instance of the proposed project, the “no project” alternative is the environmentally superior alternative; therefore, this EIR identifies an environmentally superior alternative between the two other alternatives that were analyzed.

Designating a superior alternative depends in large part on what environmental effects one considers most important. The Draft EIR does not presume to make this determination; rather, the determinations of which impacts are more important, are left to the reader and the decisionmakers.

Finally, it should be noted that the environmental considerations are one portion of the factors that must be considered by the public and the decisionmakers in deliberations on the proposed project and the alternatives. Other factors of importance include urban design, economics, social factors, and fiscal considerations. In addition, the superior alternative would, ideally, still provide opportunities to achieve most of the stated project objectives. The proposed project objectives are as follows:

- Provide a mixed-use continuing care retirement community (CCRC) of approximately 860 residential units, approximately 28,500 square feet of retail uses, and approximately 190,000 square feet of medical/professional office uses on a single, infill site in close proximity to existing compatible land uses;
- Help realize the County’s implementation of the Blueprint project of the Sacramento Area Council of Governments through the provision on a single infill site of: (1) a range of housing types, (2) mix of uses, (3) transportation choices, (4) compact development, (5) use of existing assets, and (6) quality design, all close to medical facilities and other compatible uses;
- Connect through an accessible and interconnected network of trails a mixed-use, continuing care retirement community (CCRC) to the County’s Dewitt Center, a regional park, and existing neighborhoods;
- Provide a potential opportunity for on-site affordable workforce housing units; and
- Provide through an economically feasible project a network of road connections to the surrounding Auburn community to provide alternative parallel roadway opportunities for local travelers.

The Reduced Density Alternative would be the environmentally superior alternative to the proposed project because the Reduced Density Alternative would result in fewer impacts related to the following issue areas: land use; biological resources; visual resources; transportation and circulation; air quality; noise; soils, geology, and seismicity; hydrology and water quality; and public services and utilities. The Reduced Density Alternative would achieve all but one of the proposed project's objectives, as listed above. The Reduced Density Alternative would not meet the first project objective, because the Reduced Density Alternative would only provide approximately 760 residential units.

The Reduced Density Alternative would be the environmentally superior alternative to the proposed project because the Reduced Density Alternative would result in the generation of fewer vehicle trips to the project area, which would decrease the air quality and noise impacts via a reduction of vehicle trips. The Reduced Density Alternative would also result in reduced impacts related to biological resources because this alternative would allow for the preservation of approximately 10 acres of on-site oak woodlands that would not be preserved with implementation of the proposed project. In addition, the Reduced Density Alternative would include the development of less residential units on-site; therefore, impacts related to land use, visual resources, soils, geology, and seismicity, and hydrology and water quality would be reduced, as compared to the proposed project. Furthermore, the Reduced Density Alternative would generate less demand for water, wastewater disposal, school facilities, fire protection, and law enforcement services. Therefore, the Reduced Density Alternative would be the environmentally superior alternative.