6 PROJECT ALTERNATIVES

6.1 INTRODUCTION

CCR Section 15126.6(a) (State CEQA Guidelines) requires EIRs 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. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states that the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] 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.

The State CEQA Guidelines require that this EIR include information about each alternative sufficient to allow meaningful evaluation, analysis, and comparison with the proposed SAP, including the PRSP. 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 must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the “no project” alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing the no-project alternative in this EIR is to allow decision makers to compare the impacts of approving the proposed SAP and PRSP with the impacts of not approving the proposed SAP and PRSP. If the no-project alternative is the environmentally superior alternative, CEQA requires that the EIR “shall also identify an environmentally superior alternative among the other alternatives” (CCR Section 15126[e][2]).

CCR Section 15126.6(f) (1) explains “feasibility” (e.g., “feasibly attain most of the basic objectives of the project”), in part, as follows:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining which alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible is made by the lead agency's decision-making body—for this project, the Placer County Board of Supervisors. (See PRC Sections 21081.5, 21081[a][3].)

6.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 3, "Project Description," identifies the SAP and PRSP project objectives, which are also described below.

SUNSET AREA PLAN PRIMARY OBJECTIVES

The overarching vision of the SAP is to take advantage of opportunities to create a unique employment, entertainment, and education center that would provide regional benefit, create primary wage–earner jobs for residents of nearby cities and unincorporated areas, and help to generate revenue to fund countywide services. The objectives that would help realize this vision are as follows:

- **High-Quality Design and Amenities:** Establish and maintain high-quality standards for architectural and aesthetic design that ensure creation and maintenance of value. Project design should integrate amenities that add interest and character, including amenities that take advantage of the Sunset Area's natural and open space features.
- **Infrastructure Improvement:** Improve Sunset Area infrastructure with an emphasis on transportation improvements and the extension of public sewer and water to expand the supply of "shovel-ready" sites.
- **Streamlining:** Streamline the land development review process for CEQA compliance and project entitlements.
- **Diversity of Opportunity:** Broaden the range of development opportunities in the Sunset Area, including support for postsecondary education facilities and associated uses (e.g., commercial, residential, research) in the PRSP area.
- **Economic Innovation and Creativity:** Transition to a more high-employee density, labor-intensive mix of uses with an emphasis on goods and services focused on innovation and creativity.
- **Housing Diversity:** Support the provision of housing types not otherwise available locally to accommodate employees of Sunset Area businesses.
- **Preservation of Existing Operations:** Preserve the viability of industrial and large-scale manufacturing operations along the Sunset Area.
- **Retention of Unique Land Supply:** Retain the large supply of large development sites in the Sunset Area by discouraging subdivisions that diminish long-term value and foreclose unique development opportunities.
- **Protection from Incompatible Uses:** Protect existing and future development from adverse impacts associated with incompatible uses.

- **Promotion of Active Transportation and Complete Streets:** Provide a network of connected bike lanes and sidewalks to accommodate cycling and walking for both functional and recreational purposes. This includes requiring street designs that balance the needs of motorists, cyclists, and pedestrians and ensuring connectivity with adjacent areas in Lincoln, Rocklin, Roseville, and unincorporated Placer County.

PLACER RANCH SPECIFIC PLAN PRIMARY OBJECTIVES

The objectives of the PRSP are more specific than those of the SAP and are more focused on the provision of residential, employment, and university-related uses than those of the larger SAP. The objectives of the PRSP are as follows:

- **Conduct Comprehensive Planning:** Prepare a Specific Plan and associated regulatory documents that collectively create a comprehensive development plan for Placer Ranch, which facilitates development in the Sunset Area in a consistent and orderly manner and that assists in accommodating Placer County's share of the region's future population growth.

- **Integrate Placer Ranch with the Sunset Area Plan:** Ensure that development of the Placer Ranch community is designed to function as a stand-alone project that is consistent with the goals and policies of the Sunset Area Plan and contributes to development in the Sunset Area Plan and adjacent development areas in Roseville, Rocklin, and Lincoln.

- **Provide a Balanced Land Use Mix:** Provide for a mix of residential and employment generating land uses, which at buildout, can feasibly support the development plan including provisions for parks, schools, a university, backbone infrastructure, and other public facilities, as well as the project's planned commercial and employment centers.

- **Catalyze Development of the Entire Sunset Area:** Create business development opportunities that will catalyze the grander vision of creating a large-scale job center in the Sunset Area Plan, which provides land for a new university and supporting employment center, retail, and residential land uses.

- **Establish a Site for California State University, Sacramento–Placer Campus:** Provide 300 +/- acres to California State University system (CSU) for development of a Sacramento State (Sac State) off-campus center in Placer County, which is sized to potentially accommodate up to 30,000 students (25,000 Sac State and 5,000 Sierra College).

- **Establish a Major Employment Center:** Create a large-scale job center that supports a wide range of employment opportunities, which implements Placer County's vision for the Sunset Area by planning for uses that allow research and development, office, retail and commercial, innovation/technology, and light manufacturing uses.

- **Incorporate a Town Center:** Establish a land use framework to create a mixed-use, urban center adjacent to employment centers and the university site, which will provide retail goods, services, and multifamily housing that benefit from proximity to job clusters.

- **Provide Diverse Housing Opportunities:** Establish places for construction of a diverse array of housing types including single-family homes in conventional and compact development patterns, townhomes, apartments, lofts, active-adult housing, dormitories, faculty housing, and housing in mixed-use buildings.

- **Meet Regional Housing Needs Allocation:** Aid the County in achieving a fair share of its obligation to accommodate a percentage of the region's forecasted population growth, as mandated by the California Department of Housing and Community Development and as directed by the Sacramento Area Council of Governments (SACOG), including applicable provisions of Senate Bill 812.

- **Supply Land Areas for Public Uses:** Ensure that the development plan provides an appropriate balance of land uses to economically support development of community-wide public and civic facilities, including an elementary school, middle school, neighborhood parks, mini parks, and open spaces.
- **Integrate Plans for Placer Parkway:** Establish a corridor for the future construction of Placer Parkway, including land areas for roadway interchanges at Foothills Boulevard and Fiddyment Road.
- **Establish Open Space for Habitat Conservation:** Create a balanced plan for on-site habitat conservation and development through the creation of open space corridors that will permanently protect sensitive resource areas and drainage ways.
- **Participate in the Placer County Conservation Plan (PCCP):** Participate in the PCCP to facilitate the permanent preservation of several types of natural resources and biological communities located throughout western Placer County.
- **Ensure Economic Viability:** Provide land use phasing and public facilities financing plans that enable the Plan Area to develop in an economically-feasible manner.
- **Create a Fiscally-Responsible Plan:** Ensure that the development plan creates a balanced community that can be implemented in a fiscally responsible manner, with neutral or positive impacts to Placer County and the provision for revenue sources for the long-term maintenance of open space areas, park facilities, landscape corridors, public services, and infrastructure.
- **Foster Sustainable Community Design:** Aid the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce reliance on the automobile.
- **Enable Blueprint Consistency:** Create a development plan that is consistent with the growth principles identified in SACOG's Blueprint, which consists of providing higher density residential neighborhoods, more compact forms of development, alternative transportation options such as Bus Rapid Transit and bicycle use, and an interconnected network of residential neighborhoods, commercial nodes, and employment centers.

6.2.2 Environmental Impacts of the Project

The proposed project would result in development of a variety of land use types. The project development details are provided in Table 6-1 below. Sections 4.1 through 4.16 of this Draft EIR address the environmental impacts of implementation of the SAP, including the PRSP, as well as off-site infrastructure needed to support implementation of the project.

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Single-Family Residential[1]	3,082 du	2,460 du	5,542 du
Age-Restricted Residential	1,050 du	0 du	1,050 du
Multifamily Residential[2]	1,504 du	0 du	1,504 du
Retail[3]	1,640 ksf	220 ksf	1,860 ksf
Office[4]	1,241 ksf	1,110 ksf	2,351 ksf
Industrial[5]	1,658 ksf	11,440 ksf	13,098 ksf

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Innovation Center/R&D[6]	901 ksf	12,000 ksf	12,901 ksf
Entertainment Mixed Use	0 ksf	3,060 ksf	3,060 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	10.3 ac	6.3 ac	16.6 ac
Parks/Open Space	69.8 ac	0.0 ac	69.8 ac
Preserve/Mitigation Areas	264.8 ac	2,263.8 ac	2,528.6 ac

Notes: ac = acres; du = dwelling units; ksf = 1,000 square feet; R&D = research and development.

[1] All medium-density residential uses are assumed to be single-family (rather than multifamily) residential.

[2] All high-density residential uses are assumed to be multifamily residential.

[3] All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.

[4] Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the remainder of the SAP area.

[5] Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.

[6] Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.

Source: Information provided by MacKay & Somps and Mintier Harnish and compiled by Ascent Environmental in 2018

Consistent with State CEQA Guidelines Section 15126.6, potentially feasible alternatives were developed with consideration of avoiding or lessening the significant adverse impacts of the project, as identified in this Draft EIR. A summary of the significant impacts of the project is provided below. (Significant impacts discussed do not include impacts that are reduced to a less-than-significant level by implementation of mitigation measures, but only those that are significant after implementation of any feasible mitigation measures.) It should be noted that the significant impacts described below do not consider those significant impacts that are considered unavoidable only because the County cannot enforce otherwise feasible mitigation measures that are identified in this EIR but outside of its jurisdiction. The reason for not including these impacts is that all of the alternatives (aside from the No-Project Alternative) would also involve the issue of the County's inability to enforce mitigation measures outside of its jurisdiction. Including these impacts would create a false similarity between the level of impact during the comparison of impacts between the project and alternatives. For example, even if an alternative might substantially reduce a significant effect of the project occurring within the County's jurisdiction, if it involved any mitigation for that issue outside the County's jurisdiction, the substantial reduction would be masked by the conclusion that the impact remains significant due only to the County's inability to enforce.

- **Aesthetics**: Implementing the project would maintain or improve visual quality in several parts of the project area. However, in areas where there would be a contrast between rural areas and new development, implementing the project would substantially degrade visual quality and character, especially considering that much taller structures would be allowed than under the existing 1997 SIA Plan. Placer County General Plan policies and proposed SAP and PRSP policies and design standards would reduce the impacts, but not to a less-than-significant level; therefore, the impact remains significant and unavoidable. Nighttime lighting for construction activities could result in substantial adverse effects on nighttime views. Nighttime lighting from buildout of the project area would create substantial light pollution. Glare from reflective surfaces of development could also be substantial, depending on building locations. The EIR includes mitigation measures to reduce impacts related to light and glare, but the impact would remain significant and unavoidable. Cumulative impacts related to contribution of substantial light affecting nighttime views would also be significant and unavoidable. Overall, the proposed project would result in a **significant impact** related to aesthetics.

- **Agricultural Resources**: Implementation of the project would require conversion of nearly 6,000 acres of Farmland (Prime Farmland, Farmland of Statewide or Local Importance, or Unique Farmland) to nonagricultural use. This impact would be significant. Mitigation measures are included in the EIR to require compensatory farmland to be preserved. However, the mitigation measure would not replace the farmland that is converted; therefore, this impact is significant and unavoidable, but on an individual project level and on a cumulative level. Overall, the proposed project would result in a **significant impact** related to agricultural resources.

- **Air Quality**: Development of the project area, from a broad planning perspective, is included in and consistent with regional air quality plans. However, the construction activities associated with the project, after implementation of mitigation measures, would result in significant and unavoidable impacts on air quality, both individually and cumulatively. Operation of the project also would result in a significant and unavoidable impact on air quality. In addition, implementation of the project would result in significant and unavoidable impacts related to exposure of sensitive receptors to toxic air contaminants (TACs) after implementation of mitigation measures. Impacts related to odors would also be significant and unavoidable after implementation of mitigation measures. Overall, the project would result in a **significant impact** related to air quality.

- **Biological Resources**: Implementation of the project would result in the removal or fill of jurisdictional waters of the United States, including wetlands subject to U.S. Army Corps of Engineers jurisdiction under the federal Clean Water Act and waters of the state. After implementation of mitigation measures, this impact would be significant and unavoidable, both individually and cumulatively. Implementation of the project would also result in potentially significant impacts on federally listed vernal pool branchiopods and western spadefoot toad, even after implementation of mitigation measures. This impact is significant and unavoidable, both individually and cumulatively. Also, the project's contribution to cumulative loss of special-status reptile, bird, and mammal species (western pond turtle, burrowing owl, loggerhead shrike, white-tailed kite, northern harrier, Swainson's hawk, tricolored blackbird, song sparrow, grasshopper sparrow, pallid bat, Townsend's big-eared bat, and American badger) would remain significant and unavoidable after implementation of mitigation measures. Overall, project impacts related to biological resources would be **significant**.

- **Cultural Resources.** Because the net SAP area could contain unrecorded historic sites, implementation of the project could result in a significant impact related to historic resources if such a resource exists and damage to or destruction of the resource occurred. After implementation of mitigation measures, this impact remains **significant.**

- **Greenhouse Gas Emissions** The project's total operations-related greenhouse gas (GHG) emission levels exceed Placer County Air Pollution Control District (PCAPCD) thresholds. Even after implementation of SAP policies and mitigation measures designed to reduce GHG emissions, the project's contribution of GHG emissions would be cumulatively significant. The impact would be significant and unavoidable. Overall, the project's GHG impact is **significant.**

- **Land Use**: The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development, or 1,000 feet with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that new residents and users within the project area would complain about odor from the WRSL and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. As described in detail in Section 4.3, "Air Quality," measures available to Placer County to mitigate odor impacts would be infeasible, but feasible

measures are available to WPWMA including revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste. Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. However, this measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Therefore, this impact would be **significant.**

- **Noise:** Considering the existing rural nature of the project area, existing noise levels are relatively low. Future construction activities would result in a substantial (i.e., 5 decibel) increase in noise. In addition, some construction work may occur during nighttime hours and exceed Placer County nighttime noise limits. Implementation programs identified in the SAP would provide substantial reductions in daytime and nighttime construction noise levels; however, reductions of this magnitude are not expected to be achieved under all circumstances; therefore, the impact would be significant and unavoidable, both on an individual project basis and a cumulative basis. Also, as shown by the modeling conducted, project-generated traffic would result in substantial increases in noise. Exterior and interior noise limits could potentially be exceeded at future planned sensitive land uses. Implementation of mitigation measures would ensure that site-specific planning would include all technologically feasible measures to reduce transit noise to the extent possible. However, not all the measures needed to adequately mitigate noise impacts would be feasible. This impact would be significant and unavoidable, both individually and cumulatively. The overall noise impact would be **significant**.

- **Population and Housing:** Buildout of the net SAP and PRSP areas would result in 55,760 new jobs, 8,094 new dwelling units, and 19,314 new residents in the project area. The increase in population resulting from development of the project would be **significant**.

- **Transportation and Circulation**: Implementation of the proposed project would result in significant impacts on a substantial number of roadway and transportation facilities in Placer County, as well as many located in several other jurisdictions near the project area. Mitigation measures are identified to reduce significant impacts; however, in many cases, the mitigation measures do not reduce the impact below the threshold of significance. In some cases, this results in a short-term significant and unavoidable impact that is eventually resolved as improvements are made to the transportation network. In other cases, the significant impact is long term. Furthermore, the per-capita vehicle miles traveled (VMT) associated with the project is considered relatively high. It is above the SACOG regional total VMT per capita, and although there is not currently a threshold of significance for VMT, the impact is considered significant. Mitigation measures would slightly reduce the per-capita VMT, but the impact would remain significant and unavoidable. The overall impact related to transportation and circulation would be **significant**.

6.3 ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER EVALUATION

OFF-SITE ALTERNATIVE

The off-site alternative would involve moving the project to another location. An update to the SIA Plan cannot occur within an area completely outside the existing SIA Plan area. Further, one of the primary objectives of the project is to update the existing 1997 SIA Plan to accommodate new, unique land uses that take advantage of the SAP area's proximity to nearby population centers, public services, and utilities. Finding a suitable alternative site for an existing project with a comparable geographic footprint, which also maintains similar access to existing roadways, utilities, services, and population centers, is not feasible. Furthermore, proximity to a large population center is critical to support the proposed Sac State–Placer Center, and the Sac State–Placer Center site has been considered for years as a potential location for a CSU campus. The Sac State–Placer Center is a critical component of the PRSP and is one of the primary PRSP objectives. For these reasons, this alternative is infeasible and dismissed from further evaluation.

6.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following discussion summarizes the alternatives evaluated and then includes a detailed description of each alternative followed by a discussion that compares each of the project's significant impacts to the relative impact that would likely result from the alternative. Because these alternative discussions are comparative, they do not necessarily identify significance conclusions (such as "significant" or "less than significant"); rather, they identify the level of impact relative to the project's significant impact. These comparisons use the following conclusions:

- **Substantially less** is used when an alternative reduces the project's significant impact below the threshold of significance for the impact being discussed.
- **Less** is used when an alternative reduces the project's significant impact, but not below the threshold of significance.
- **Similar** is used when the alternative's impact is approximately the same as the project's impact.
- **Greater** is used when the alternative increases the severity of the project's significant impact, or results in a new significant impact that would not occur as a result of project implementation.

Alternatives evaluated in this Draft EIR are:

- **Alternative 1: No-Project–1997 SIA Plan**. This alternative assumes that the proposed project is not approved and that development occurs consistent with the 1997 SIA Plan. In the 20-year timeframe, implementing this alternative would result in less than half the amount of development that would be allowed under the project.
- **Alternative 2: Reduced Scale.** Section 4.1, "Aesthetics," of this Draft EIR identifies significant impacts related to the proposed change to the visual character of the plan area. Part of this significance determination relates to the abrupt transition from undeveloped preserve land to developed land, and the larger scale of development allowed, compared to existing development. The Reduced Scale Alternative would reduce the overall scale of development by reducing the allowed maximum building height. This alternative would also help smooth the transition between developed areas and undeveloped preserve areas. The Sac State–Placer Center would not change under this alternative.
- **Alternative 3: Reduced Footprint, Reduced Development Potential.** As described in Section 4.4, "Biological Resources," of this Draft EIR, nearly all of the undeveloped property within the project area is considered vernal pool recovery core area (USFWS 2005). The project would result in preservation of about 29 percent, or 2,140 of the 7,424 acres, of core area. This alternative is designed to address the significant project impact by increasing the amount of core area preserved to 3,607 acres, which would be about 49 percent (1,467 more acres of core area than would be preserved under the project). As described below, this alternative would reduce the area subject to development as compared to the project and would reduce the overall development potential of the project, which also addresses other significant impacts associated with the project, including traffic, VMT, GHG emission, air quality, and noise. The Sac State–Placer Center would not change under this alternative.
- **Alternative 4: Reduced Footprint, Similar Development Potential.** This alternative would include approximately the same development footprint as identified above for Alternative 3, and would achieve a similar reduction in the project-related impact to core vernal pool habitat. However, rather than reducing development potential, this alternative would maintain similar development potential. Maintaining a development potential similar to the project within an area that has almost 1,500 fewer developable acres requires an increase in net density. This would result in more compact development with a shift from lower density residential to higher density residential. Nonresidential structures would be slightly taller, and some may include parking structures. The Sac State–Placer Center would not change under this alternative.

- **Alternative 5: Reduced VMT.** Section 4.14, "Transportation and Circulation," of this Draft EIR identifies significant project impacts related to VMT. One of the reasons for the high level of VMT associated with the project is that the SAP Entertainment Mixed-Use (EMU) designation allows region-serving uses, potentially including region-serving retail, and/or entertainment venue, which could result in large numbers of people traveling long distances to the SAP area from other areas in the region and beyond. Traffic modeling for the 20-year scenario revealed that by removing the nonresidential development from the EMU designation, VMT decreased by 25 percent. This alternative aims to achieve the reduction in VMT by eliminating the non-residential uses from the EMU. Overall, the Reduced VMT alternative results in a 20-percent reduction in nonresidential floor area in the net SAP area (in the 20-year development scenario). The PRSP would not change substantially under this alternative.

6.4.1 Alternative 1: No-Project–1997 SIA Plan Alternative

Under CEQA, the No-Project Alternative must consider the effects of forgoing the project altogether. The purpose of analyzing the No-Project Alternative is to allow decision makers to compare the impacts of the proposed project versus no project. The No-Project Alternative can consist of either a "no development" alternative, under which no development occurs in the project area, or an alternative under which development is assumed to occur consistent with the presiding development plan and according to existing land use designations, or both.

Part of the proposed SAP area has already been slated for growth per the approved 1997 SIA Plan. As such, this Draft EIR analyzes a no-project alternative that assumes development consistent with the land use designations in the existing 1997 SIA Plan. Exhibit 6-1 presents the 1997 SIA Plan Land Use Diagram. Unlike the proposed SAP, the 1997 SIA Plan does not include specific details regarding the total projected floor area at buildout; rather, it identifies maximum nonresidential floor area ratios (Table 6-2). These ratios can be compared with those in Table 3-1 (in Section 3, "Project Description"), which provides similar details for the proposed SAP. However, the traffic section of the 1997 SIA Plan EIR does identify nonresidential floor area for the 20-year buildout scenario. Therefore, although a comparison of full buildout between the two plans cannot be provided, a comparison of the 20-year development project is possible. Table 6-3 below presents a side-by-side comparison of the 20-year projected buildout for the 1997 SIA Plan versus the 20-year projected buildout of the proposed project (which includes full buildout of the PRSP). Note that the specific land uses presented in Table 3-3 are combined in Table 6-3 below for comparison purposes.

Table 6-2 1997 Sunset Industrial Area Plan Development Standards

Land Use Designation	Total SIA Acres	Minimum Lot Area	Maximum DUs per Net Acre	Maximum Nonresidential FAR
Business Park (BP)	892	5 acres[1]	0[2]	1.80
Industrial (I)	3,479	20,000 sq. ft.	0[2]	1.80
General Commercial (GC)	49	6,000 sq. ft.[3]	21	2.00
Agriculture 20 Acre (AG 20)	633	20 acres	0.05	0.30
Agriculture 80 Acre (AG 80)	2,870	80 acres	0.00125	0.30
Public Facility (PF)	776	n/a	0.00	n/a
Open Space (OS)	184	200,000 sq. ft.	0.00	0.02

Notes [from Table 1-2 in the 1997 SIA Plan]:

[1] Section 5.320E1 of the Zoning Ordinance provides exceptions to the 5-acre requirement.

[2] Sections 5.320 and 5.340 of the Zoning Ordinance permit caretaker housing.

[3] This minimum lot size standard is for a corner lot. Section 5.220C of the Zoning Ordinance permits 5,000 sq. ft. for interior lots.

Source: Placer County 1997:Table 1-2

Table 6-3 20-Year Development Projections for 1997 SIA Plan and Proposed Project

Land Use Type	1997 SIA Plan	Proposed Project[1]	Difference (Project – SIA Plan)
Retail	81 ksf	1,859 ksf	1,778 ksf
Office	974 ksf	2,171 ksf	1,197 ksf
Industrial/R&D	5,581 ksf	6,786 ksf	1,205 ksf
Residential	–	5,956 du	5,956 du
Entertainment Mixed-Use	–	2,615 ksf	2,615 ksf
University	–	30,000 students	30,000 students

Notes: ksf = 1,000 square feet, du = dwelling unit, R&D = research and development.

[1] Specific Land Use Designations for SAP were combined for comparison purposes. See Table 3-3 for the projections for specific SAP land use designations. Assumes full Buildout of PRSP.

Sources: Placer County 1997; other information provided by Fehr & Peers 2018 and compiled by Ascent Environmental in 2018

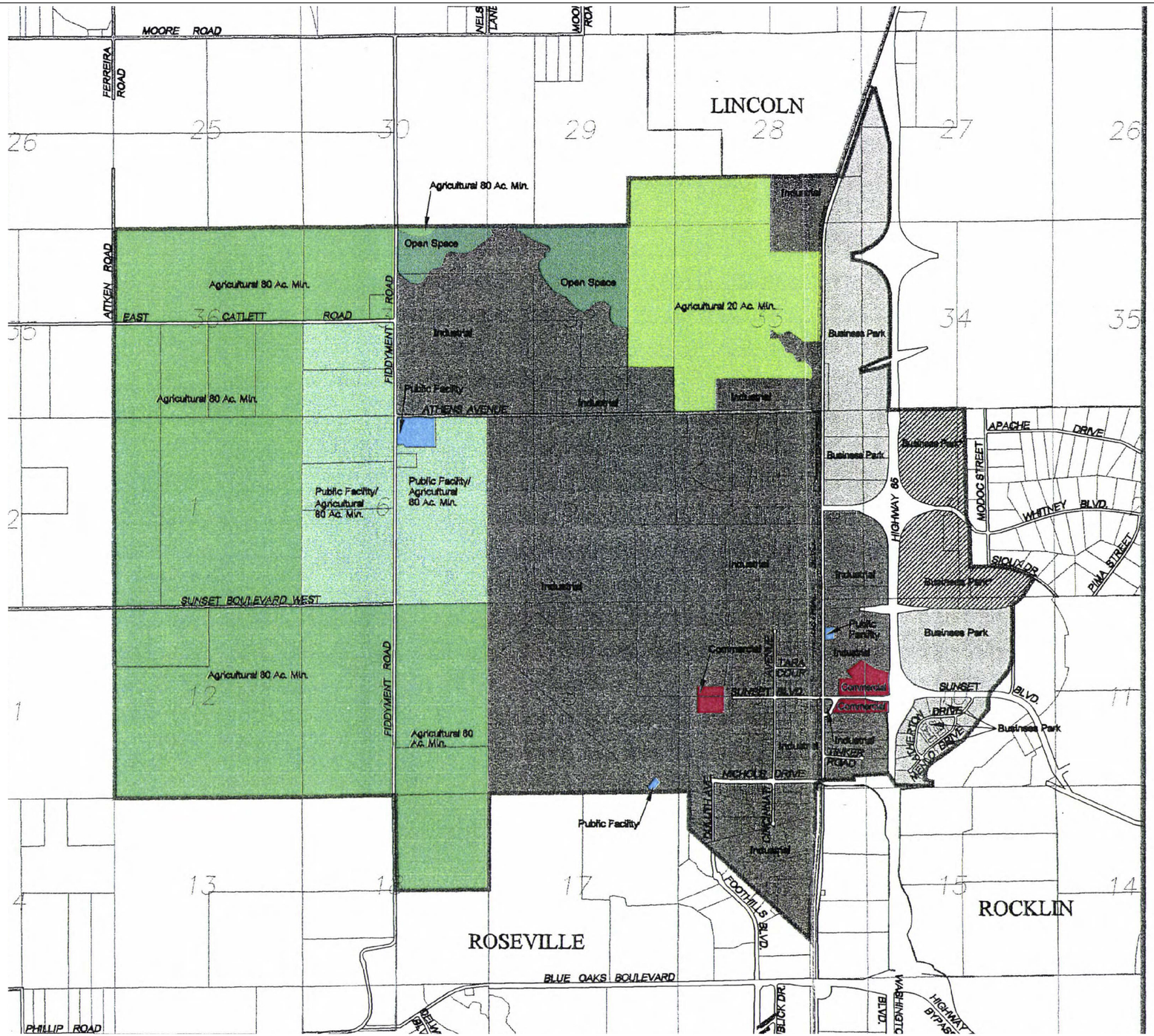
Without taking into consideration potential open space buffers required in SAP policy and provided in the PRSP, the proposed project would result in nearly 1,000 acres of urban development above the level identified in the 1997 SIA Plan. This is primarily because, although the project includes over 2,500 acres of land designated for mitigation/preserve, the 1997 SIA Plan included large areas of land (approximately 3,500 acres) on the east portion of the plan area designated for agricultural uses.

The 1997 SIA Plan also differs from the project with respect to the types of urban land uses identified. The 1997 SIA Plan does not include residential land uses. It also does not include region-serving destinations, such as regional shopping centers, and entertainment venues that are identified in the proposed EMU designation. Furthermore, the 1997 SIA Plan does not include a university site.

Also, comparing the 20-year buildout projections for both the 1997 SIA Plan and the proposed project, the level of development anticipated in the 20-year horizon would be lower under the 1997 SIA Plan than under the project. As shown in Table 6-3, the proposed SAP includes substantially more floor area for retail, but similar floor area for commercial and industrial/R&D (research and development) land use categories. However, the project also includes several land uses not included in the 1997 SIA, such as 5,956 residential units, 2.6 million square feet (sq. ft.) of entertainment-mixed use, and the Sac State–Placer Center, which would accommodate 30,000 students in the 20-year projection. Within the 20-year buildout projection, the No-Project Alternative would result in less than half of the amount of development allowed under the project. It should be noted that, because Pleasant Grove Retention Facility is approved by City of Roseville (although at a smaller capacity than identified in this EIR), the No-Project Alternative assumes that the Pleasant Grove Retention Facility would be constructed at the capacity at which it was approved.

COMPARISON OF NO-PROJECT ALTERNATIVE AND PROJECT IMPACTS

The 1997 SIA Plan designates most of the SAP area for future development. The project and the 1997 SIA Plan both include large areas of land that would be left undeveloped. The 1997 SIA Plan includes over 3,500 acres that would remain in agricultural use, whereas the proposed project designates over 2,500 acres for mitigation/preserve. Therefore, because the No-Project Alternative includes less land identified for development, it would require less construction and would result in less conversion of undeveloped land to urban use. Although both the 1997 SIA Plan and the project result in impacts related to construction and operation of urban development, the project would result in nearly double the amount of development in the 20-year buildout projection compared to the 1997 SIA Plan. Therefore, the following comparison of impacts will focus on the significant project impacts related to both construction and operation.



SUNSET INDUSTRIAL AREA LAND USE DIAGRAM

- Agricultural 20 Ac. Min.
- Agricultural 80 Ac. Min.
- Business Park
- Business Park*
- Commercial
- Industrial
- Open Space
- Public Facility
- Public Facility/Agricultural 80 Ac. Min.

* Development other than Agriculture or Open Space uses shall not be permitted on these parcels until such time that a state highway interchange is constructed at N. Whitney Blvd. or roads parallel to S.R. 65 provide alternative access.

Adopted by the Board of Supervisors on
June 24, 1997
Resolution Number: 97-178
(GPA-316)

N
W E
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Not to Scale

Note: A larger more legible map is available in the Planning Department.

Prepared by: Placer County Planning Department, Geographic Information Division.

Date: June 24, 1997

Sunset Industrial Area Plan - Placer County \ 930338

Source:

X16010076 01 042

Exhibit 6-1 **1997 SIA Plan Land Use Diagram**

ASCENT ENVIRONMENTAL

Aesthetics

Implementation of the No-Project Alternative would result in development urban land uses. The primary differences between the No-Project Alternative and the project are the types of land uses, the scale of structures, and the development footprint. Unlike the project, the No-Project Alternative does not specifically identify residential land use types—the land use designations are nonresidential. Also, the No-Project Alternative would allow structures only 50 feet tall, whereas the project would allow structures up to 225 feet tall. Also, the No-Project Alternative designates over 3,500 acres of land for agricultural uses. The project designates over 2,500 acres as mitigation/preserve but does not include agricultural land use designations. Regarding the project's significant impacts related to visual character, these differences would result in some reduction in the level of impact, because of the reduction in allowed building height and increase in the amount of land left undeveloped. Further, regarding the significant light and glare impact associated with the project, although there would be less development associated with the No-Project Alternative than under the project, there would still be a large number of new light sources added to the project area. For these reasons, the No-Project Alternative would result in **less** impact compared to the proposed project, but the impact related to aesthetics would likely remain significant.

Agricultural Resources

The No-Project Alternative designates nearly 3,500 acres of Farmland (Farmland of Local Importance) for agricultural uses. Although the No-Project Alternative would result in less conversion of Important Farmland than the proposed project, it would still result in conversion of Farmland, which is considered a significant impact. Therefore, the No-Project Alternative would result in **less** impact to agricultural resources than the project.

Air Quality

Implementing the No-Project Alternative would result in a slightly smaller development footprint and substantially less development than the proposed project. Therefore, construction-related air pollutant emissions would be slightly reduced, and emissions associated with project operation would be reduced considerably. However, considering that the mitigated construction-related oxides of nitrogen (NO_x) emissions (for the net SAP and PRSP area) would be over three times the PCAPCD threshold, and operations-related emissions of NO_x would be over 50 times the PCAPCD's threshold (for development of the net SAP area alone), the emissions associated with the No-Project Alternative would still exceed the threshold for both construction and operation, even though it would result in less than half the level of development compared to the project. Regarding the significant project impact related to TAC, the No-Project Alternative does not identify residential land uses; therefore, unlike the proposed project, it would not likely place sensitive receptors near high-volume roadways or other substantial source of TAC. This would minimize the project's significant impact related to TAC exposure. The No-Project Alternative would also not place sensitive land uses within 1 mile of the WRSL, which would avoid a significant and unavoidable impact associated with the project. The overall impact related to air quality would be **substantially less**.

Biological Resources

Although it would result in less conversion of undeveloped land to urban land uses, the No-Project Alternative does not include any preserve/mitigation designations to protect core vernal pool habitat areas or areas identified for stream corridor protection. It also identifies development within existing preserve land. Therefore, the No-Project Alternative could result in greater impacts to these sensitive habitats compared to the project. Regarding special-status species, development identified under the alternative would result in similar types of impacts, although the reduced area of development may slightly reduce ground disturbance, which could result in marginally reduced impacts. Overall, because the No-Project Alternative does not preserve the sensitive habitat in the SAP area and could adversely affect existing preserve land, it could result in a **greater** impact compared to the project.

Cultural Resources

The No-Project Alternative would result in development within the net SAP area. Because the net SAP area could contain unrecorded historic sites, implementation of the No-Project Alternative could result in a

significant impact related to historic resources if such a resource exists and damage to or destruction of the resource occurred. This impact would be **similar** to the project's impact.

Greenhouse Gas Emissions

Because the No-Project Alternative results in less than half the amount of development identified in the project, and because the alternative would not include the region-serving uses identified in the proposed EMU, which increase VMT, the alternative would generate fewer operations-related GHG emissions. Although it is likely that the GHG emissions generated by the No-Project Alternative would still exceed the PCAPCD threshold of significance, the No-Project Alternative would still result in **less** impact related to GHG emissions than the proposed project.

Land Use

The project would result in a significant impact related to land use compatibility primarily associated with proximity of proposed sensitive land uses to the WRSL. The No-Project Alternative identifies only nonresidential land uses, which are not as sensitive to odors generated by the WRSL. Also, the No-Project Alternative designates land surrounding three sides of the landfill property (the north, west, and south sides) for agricultural uses, which are generally not considered sensitive to odors. The land uses identified in the 1997 SIA Plan are generally considered compatible with the WRSL; therefore, the No-Project Alternative would avoid this significant project impact, and the overall impact would be considered **substantially less** than that of the project.

Noise

Although the No-Project Alternative includes a smaller development footprint and substantially less development than proposed under the project, assuming a similar rate of development as the project, implementation of the No-Project Alternative could result in similar construction-related noise levels. Also, although the level of development is less than that proposed under the project, the development of over 6 million sq. ft. of nonresidential development would likely result in a substantial increase in traffic noise, even though it would be less than the traffic noise generated by the project. Overall, the noise impacts associated with the No-Project Alternative would be **less** than those of the project.

Population, Employment, and Housing

The No-Project Alternative would not add as many jobs as the proposed project and would not add any residences. Therefore, although the No-Project Alternative would result in substantial employment growth (although not as much as the project), it would result in no direct population growth associated with adding new residences to the area. Although the employment growth would be considered substantial, the No-Project Alternative would avoid the significant impact associated with population growth. The overall impact related to population, employment, and housing would be **substantially less** than that of the project.

Transportation and Circulation

The project results in significant traffic impacts to a substantial number of roadway and transportation facilities across several jurisdictions. Although the level of development resulting from the No-Project Alternative is less than that of the project, the development of over 6 million sq. ft. of nonresidential development would likely result in a substantial increase in traffic. However, the likely number of transportation facilities affected and the severity of impacts would likely be reduced. Also, in addition to the reduction in the level of development, because the No-Project Alternative does not include regional-serving uses associated with the SAP's proposed EMU, the VMT would likely be reduced. However, this VMT reduction would be limited by the fact that the No-Project Alternative includes no residential uses to help moderate the nonresidential VMT. Overall, the No-Project Alternative would result in **less** impact than the project with respect to transportation and circulation, but there would still be significant impacts.

6.4.2 Alternative 2: Reduced Scale

Section 4.1, "Aesthetics," identifies significant impacts related to the proposed change to the visual character of the SAP area. Part of this significance determination relates to an abrupt transition from undeveloped preserve land (designated to remain in preserve) to developed land. An additional consideration pertains to the larger scale of development allowed, compared to existing development. The Reduced Scale Alternative addresses these scale and transition issues. This alternative appears to meet most of the project objectives described above.

Most existing occupiable structures in the SAP area are under 50 feet tall. At 17 stories and 227 feet, Thunder Valley Casino Resort is the primary exception. The proposed SAP would allow buildings taller than 50 feet in several zones: up to 75 feet in the Service and Commercial (SC) and Business Professional (BPL) zones, up to 100 feet in the Eco-Industrial (EI) zone, up to 225 feet in the EMU zone, and up to 150 feet in the Innovation Center (IC) zone. Most of the PRSP would only allow structures up to 60 feet; however, structures up to 150 feet would be allowed in the Campus Park designation.

The Reduced Scale Alternative would reduce the allowed maximum building height to 60 feet throughout the SAP. This would allow structures of five stories, and potentially up to six stories depending on floor height. Six stories may be considered the maximum height that a structure is still considered a low-rise building. Note that this maximum would not apply for specific zones where the SAP currently limits building heights to below 60 feet. For example, some proposed zones such as, the Entertainment Mixed-Use (Cornerstone District) (EMU/CD) zone, the Light Industrial (LI) zone, the Industrial Mixed-Use (IMU) zone, the Open Space (OS) zone, and the Farm Development Reserve (F-DR) zone, contain building heights between 36 and 50 feet and therefore, building height allowance for those zones would remain as proposed in the SAP. Details regarding the SAP zones are included in Part 3 of the SAP, "Implementing Zoning."

To address the visual transition between existing preserve land and future urban development, this alternative would include a "transition zone" within 500 feet of existing preserves and land outside the SAP area designated for long-term agricultural use. The transition zone should include requirements such as the following:

- Require development within the transition zone to be low scale (single story).
- Require development within the transition zone to be clustered to create open space and landscaped areas that visibly connect to preserve areas and agricultural areas.
- Maximize public open space and parks within transition zones (again, with no trail connections to preserve areas).
- Require a 100-foot landscaped buffer between proposed structures and existing/proposed preserve areas, or include a 100-foot landscaped greenbelt (maintained) between existing/proposed preserves and land designated for development.

Although the heights allowed in the proposed SAP allow for greater flexibility for structure siting, orientation, and design, these heights are not critical to provide the overall development capacity allowed under the project. Therefore, this alternative provides the same overall development capacity as the proposed project. Please refer to Table 6-1 for the development details associated with the alternative. Because these changes in height restrictions would occur in the SAP implementing zoning and PRSP development standards documents and would not change any of types or locations of the land use designations, the land use diagrams of the SAP and PRSP would not change; therefore, please refer to Exhibits 3-5 and 3-10 in Chapter 3.0, "Project Description," for the graphical depiction of this alternative.

COMPARISON OF ALTERNATIVE 2 AND PROJECT IMPACTS

The Reduced Scale Alternative is aimed at reducing the project's significant impact to the site's visual character that results from the increased buildout height allowance and the abrupt transition between proposed urban development and existing undeveloped preserve lands. Implementation of this alternative would result in the same level of development as the proposed project and the same footprint as the proposed project. Therefore, except for impacts related to aesthetics, the impacts associated with operation and construction of this alternative would be nearly identical to those of the project. The following discussion focuses on the potential for this alternative to reduce the project's significant aesthetic impacts.

Aesthetics

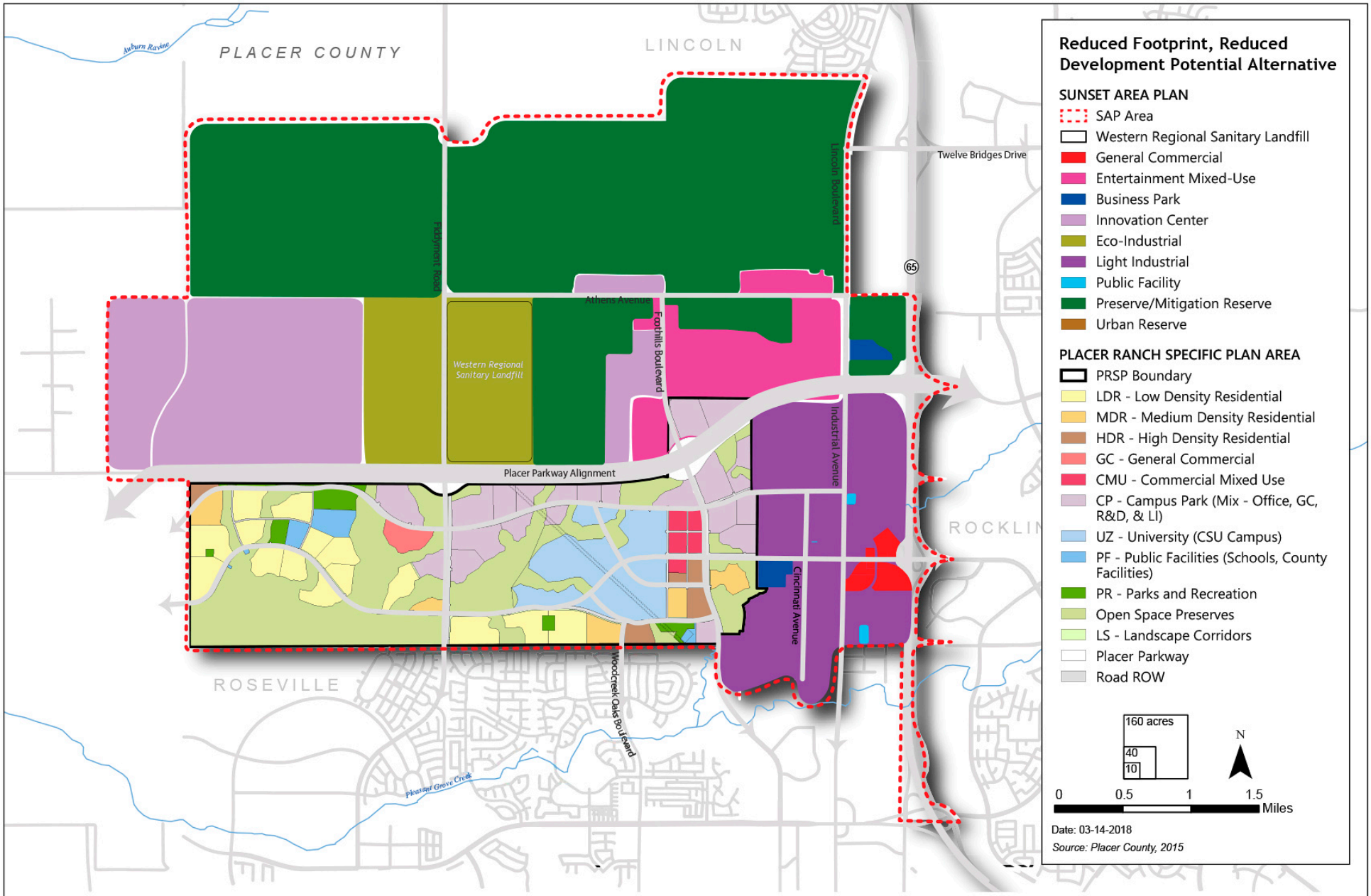
Regarding nighttime lighting, the reduction in building height could result in an inconsequential reduction in night lighting because the buildings would not be as visible from far distances; however, because the overall level of development would remain the same as under the project, the overall level of nighttime lighting would be similar, and the Reduced Scale Alternative would result in similar impacts related to nighttime lighting.

Regarding visual character, the proposed SAP includes zones that allow structures up to 100 feet tall, and one zone that allows structures up to 225 feet tall. As described in Impact 4.1-1, for views where project development would be placed adjacent to preserved open space, visual quality would substantially decrease because of the abrupt transition between substantially taller development and open space. Design guidelines have been prepared for the project that facilitate a cohesive aesthetic appearance of development and landscaping within the overall project area. Placer County General Plan policies and proposed SAP and PRSP policies would also help reduce impacts of the project by creating a more cohesive and aesthetically pleasing design in the developed areas; however, because the project would allow substantially taller buildings than currently exist in the project area, the existing and proposed policies would not substantially ease the abrupt transition between the tall buildings and the preserved open space areas. Therefore, the project's overall impact related to visual quality would be significant and unavoidable.

The Reduced Scale Alternative would limit building height to 60 feet and would require softer transition between existing preserve/mitigation land and urban development by requiring single-story structures and additional buffers adjacent to the preserve/mitigation land. The alternative would otherwise include similar design guidelines to those included with the SAP and PRSP and that policies similar to those included in the SAP would apply. However, even with lower-scale development, softer transition between existing preserve/mitigation land, and implementation of policies and design guidelines, the substantial change in visual character of the urban development contrasted against the undeveloped preserve/mitigation land would still constitute a substantial adverse change in visual quality. Therefore, although the impact under the alternative would be **less** than the project's impact as a result of the reduced building height allowance and the softer transitions, the impact would still be significant.

6.4.3 Alternative 3: Reduced Footprint, Reduced Development Potential

Section 4.4, "Biological Resources," of this Draft EIR identifies significant impacts associated with impacts to vernal pool habitat. Nearly all of the undeveloped property within the project area is considered vernal pool recovery core area (USFWS 2005). The project would result in preservation of about 29 percent, or 2,140 of the 7,424 acres, of core area. This alternative is designed to reduce the significant impact by increasing the amount of core area preserved to 3,607 acres, which would be about 49 percent (1,467 more acres of core area than would be preserved under the project). The land identified for preservation was considered to balance highest vernal pool habitat value, while providing a functional land use plan, and also maintaining wildlife movement corridors. The conceptual land use diagram for the alternative is shown in Exhibit 6-2 below. This alternative appears to meet most of the project objectives described above.



Source: Mintier Harnish 2018, MacKay & Somps 2018

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Exhibit 6-2

Alternative 3: Reduced Footprint, Reduced Development Potential

This alternative would reduce the land area subject to development as compared to the project and would maintain the project's net density, which would result in a reduction of the project's development potential by applying the same net density to a smaller developable area. (While "gross density" refers to the amount of development in a given area regardless of undevelopable space, "net density" refers to the amount of development in a given area after subtracting undevelopable areas, such as open space.) Removing almost 1,500 acres of developable land while maintaining the net density would reduce the development potential. Table 6-4 provides the development details of the alternative at buildout. This alternative would result in nearly 30 percent fewer single-family residential units and over 40 percent fewer multifamily residential units. Retail would not substantially change; however, office floor area would be reduced by nearly 40 percent, industrial floor area by nearly 30 percent, and Entertainment Mixed-Use by nearly 25 percent. It should be noted that the Sac State–Placer Center would not change under this alternative. The reduction in the development potential addresses other significant impacts associated with the proposed project, including those related to trip generation and traffic, such as VMT, GHG emissions, air quality, and noise.

Although the development potential would be reduced, because the net density would be maintained, the character of the development within the SAP area would appear, at the pedestrian level, very similar to that of the proposed project. The heights and separations of the buildings, the parking, and the mix of high-, medium-, and low-density housing would be similar to those of the project (although with a slightly higher ratio of multifamily housing). The primary difference in appearance is that the open space/preservation area would be much larger under this alternative than under the project.

Table 6-4 Development at Buildout of Alternative 3: Reduced Footprint, Reduced Development Potential

Land Use Type	PRSP Area	Net SAP Area	Alternative Total
Single-Family Residential[1]	1,850 du	2,120 du	3,970 du
Age-Restricted Residential	178 du	0 du	178 du
Multifamily Residential[2]	1,181 du	0 du	1,181 du
Retail[3]	1,706 ksf	220 ksf	1,926 ksf
Office[4]	1,124 ksf	260 ksf	1,384 ksf
Industrial[5]	1,920 ksf	7,510 ksf	9,430 ksf
Innovation Center/R&D[6]	1,252 ksf	10,570 ksf	11,822 ksf
Entertainment Mixed Use	-	2,340 ksf	2,340 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	36.0 ac	6.3 ac	42.3 ac
Parks/Open Space	54.7 ac	0.0 ac	54.7 ac
Preserve/Mitigation Area	687.5 ac[7]	2,907.7 ac	3,595.2 ac[7]

Notes: ac = acres; du = dwelling units; ksf = thousand square feet; R&D = research and development.

1. All medium-density residential uses are assumed to be single-family (rather than multifamily).
2. All high-density residential uses are assumed to be multifamily residential.
3. All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.
4. Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the SAP area.
5. Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.
6. Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.
7. Does not include 57.5 acres of open space preserve from the Sac State–Placer Center.

Sources: Information provided by MacKay & Somps, Mintier Harnish, and Fehr & Peers and compiled by Ascent Environmental in 2018

COMPARISON OF ALTERNATIVE 3 AND PROJECT IMPACTS

The Reduced Footprint, Reduced Development Potential Alternative would result in both a smaller development footprint and a reduction in overall development compared with the proposed project. Therefore, the alternative would decrease the amount of conversion of undeveloped land and would consequently decrease the amount of ground disturbance, relative to the project. As noted in Table 6-4 above, the alternative would result in less overall development and would therefore generate less traffic, demand less energy and other utilities, and result in less population and employment growth. A comparison is provided below that evaluates the impacts of the alternative relative to the project's significant impacts.

Aesthetics

Although the overall level of development would be less than under the project, because the net density of development would be similar under the Reduced Footprint, Reduced Development Potential Alternative, the resulting visual character would be consistent with the urbanized areas within the plan area. The alterative would provide additional preserve areas, which would slightly reduce impacts related to the change in the character of the site (because less of the site would be developed); however, it would not substantially reduce impacts associated with the potential for taller buildings and the abrupt transition from preserve/open space land to developed land. In addition, although the level of potential development would result in some reduced level of night lighting, it would not be a substantial reduction and would not avoid or minimize the project's significant impact (both individually and cumulatively) related to light and glare. However, less development under the alternative would result in moderately less light pollution than would occur under the project. Overall, impacts on aesthetics would be **less** than under the proposed project.

Agricultural Resources

Although the development footprint would be smaller, the Reduced Footprint, Reduced Development Potential Alternative would not maintain any agricultural land use designations; therefore, even though the alternative would result in less conversion of Important Farmland to urban use, the farmland would be placed under permanent conservation, and the ability to cultivate the property would be restricted. The impacts on agricultural resources would be **similar** between the project and the alternative.

Air Quality

The Reduced Footprint, Reduced Development Potential Alternative would result in a smaller development footprint and less development than the proposed project. Because of the smaller footprint, construction-related air pollutant emissions would be slightly reduced. However, the mitigated construction-related NO_x emissions (for the net SAP and PRSP areas) would be over three times the PCAPCD threshold; therefore, the reduction in the project footprint by 1,500 acres (less than 20 percent of the total SAP area) would not reduce the construction-related emissions below the PCAPCD threshold. In addition, although emissions associated with project operation would be reduced because of the lower level of development, the project's operations-related emissions of NO_x would be over 50 times the PCAPCD's threshold (for development of the net SAP area alone); therefore, the operations-related emissions associated with the alternative would still exceed the PCAPCD's threshold. Regarding the significant project impact related to TAC, the Reduced Footprint, Reduced Development Potential Alternative would still include potential residential uses within land use designations adjacent to the freeway, and the alternative's impact related to TAC exposure would be similar. Also, because the concentration of residences in proximity to the WRSL would be lower than under the project, the alternative would result in slightly reduced impacts related to exposure of people to objectionable odors. Overall, air quality–related impacts of the alternative would be **less** than under the proposed project, but would still exceed the thresholds.

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in fewer acres of developed land, and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent. The U.S. Fish and Wildlife Service (USFWS) preservation target for vernal pool recovery core areas is 85 percent, so the

increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Reduced Development Potential Alternative would be **less** compared to those resulting from the project.

Cultural Resources

Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in fewer acres of developed land, and, therefore, there would be a minor reduction in the potential to damage unrecorded historic sites, but given the large amount of land in the net SAP area that would still be developed under the alternative, the reduction would be inconsequential. Overall, the impacts of the Reduced Footprint, Reduced Development Potential Alternative would be **similar** to those under the project.

Greenhouse Gas Emissions

Operational emissions of GHG generally correlate to the size and intensity of a project and the associated energy consumed and VMT. Operation of the proposed project would generate a considerable amount of GHG. Implementation of mitigation measures identified in the EIR would substantially reduce on-site emissions; however, emissions levels would still exceed the PCAPCD threshold. The alternative would result in less overall development than the project; however, even assuming the same mitigation measures apply, the overall GHG emissions associated with operation of the alternative would still likely be above the PCAPCD threshold. For these reasons, the GHG impact associated with the Reduced Footprint, Reduced Development Potential Alternative would be **less** compared to the impacts resulting from the project.

Land Use

The project would place sensitive land uses in an area that is currently exposed to odors generated by the WRSL. The impact related to land use compatibility is considered significant. The Reduced Footprint, Reduced Development Potential Alternative would also place sensitive receptors in this area (although there would be fewer receptors included under the alternative than the project). Therefore, overall, impacts related to land use compatibility would be **similar** to those of the project.

Noise

Although there would be a reduction in the overall development footprint compared to the project, implementation of the Reduced Footprint, Reduced Development Potential Alternative would involve a comparable level of construction, which would include similar types of construction activities and similar types of equipment. Therefore, similar implementation measures would be required for construction noise, and construction-related impacts would be similar. Regarding operations-related impacts, even though the alternative would result in less overall development and would result in an associated reduction of traffic compared to the proposed project, traffic noise is still expected to substantially increase, especially because the alternative would still require extension of roadways in areas where no road currently exists. Similar mitigation measures would be required, but the impact, similar to the project, would remain significant. Overall, the noise impact of the Reduced Footprint, Reduced Development Potential Alternative would be **similar** to that under the project.

Population, Employment, and Housing

The Reduced Footprint, Reduced Development Potential Alternative would result in nearly 30 percent fewer single-family and over 40 percent fewer multifamily residential units compared to the project. Retail would not substantially change; however, office floor area would be reduced by nearly 40 percent, industrial floor area by nearly 30 percent, and Entertainment Mixed-Use by nearly 25 percent. These reductions would translate into less population and employment growth compared to the project; however, considering that the alternative still results in the development of over 5,000 residential units and nearly 25 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would result in

substantial population and employment growth in the area. Although the impact would be **less** than under the project, it would still be significant.

Transportation and Circulation

Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in less development than the project. Therefore, trip generation would be lower and traffic impacts would be reduced. However, considering that the alternative still results in the development of over 5,000 residential units and nearly 25 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would still result in substantial traffic impacts, although the likely number of transportation facilities affected and the severity of impacts would likely be reduced. Regarding VMT, it is not likely that the alternative would result in a substantially different per-capita VMT because residential and nonresidential uses are both reduced by somewhat similar percentages. Overall, the impact related to traffic would be **less** than the impact associated with the project, but the impact would likely remain significant even after implementation of similar mitigation measures.

6.4.4 Alternative 4: Reduced Footprint, Similar Development Potential

This alternative is designed to achieve the same footprint reduction (and therefore the same core vernal pool habitat preservation) as Alternative 3, but, rather than reducing the development potential, Alternative 4 would maintain approximately the same development potential as the proposed project. This would be achieved by condensing a similar level of development into a smaller area, which increases the net density. This alternative appears to meet most of the project objectives described above.

Note that because the alternative removes nearly 1,500 acres of developable land from the project area, although the development types would be the same and the level of development of each type would be similar, the alternative would not include exactly the same development details as the project. Table 6-5 provides the development details for buildout of Alternative 4. The conceptual land use diagram for Alternative 4 is shown in Exhibit 6-3 below. The increase in net density results in more compact development, which shifts the residential mix in the PRSP area from a more low-density focus to a more medium- and high-density focus. The alternative would result in a 12-percent decrease in single-family housing and would eliminate the age-restricted residential housing; however, the alternative would increase the number of multifamily residential units by over 40 percent. Nonresidential uses are substantially similar compared to the proposed project, except that office floor area would decrease by over 30 percent under the alternative. It should be noted that the Sac State–Placer Center would not change under this alternative.

Table 6-5 Development at Buildout of Alternative 4: Reduced Footprint, Similar Development Potential

Land Use Type	PRSP Area	Net SAP Area	Alternative Total
Single-Family Residential[1]	2,402 du	2,460 du	4,862 du
Age-Restricted Residential	0 du	0 du	0 du
Multifamily Residential[2]	3,422 du	0 du	3,422 du
Retail[3]	1,951 ksf	220 ksf	2,171 ksf
Office[4]	1,220 ksf	300 ksf	1,520 ksf
Industrial[5]	1,920 ksf	12,020 ksf	13,940 ksf
Innovation Center/R&D[6]	1,252 ksf	12,080 ksf	13,332 ksf
Entertainment Mixed Use	-	3,280 ksf	3,280 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	36.0 ac	6.3 ac	42.3 ac

Table 6-5 Development at Buildout of Alternative 4: Reduced Footprint, Similar Development Potential

Land Use Type	PRSP Area	Net SAP Area	Alternative Total
Parks/Open Space	54.7 ac	0.0 ac	54.7 ac
Preserve/Mitigation Area	687.5 ac[7]	2,907.7 ac	3,595.2 ac[7]

Notes: ac = acres; du = dwelling units; ksf = thousand square feet; R&D = research and development.

1. All medium-density residential uses are assumed to be single-family (rather than multifamily).
2. All high-density residential uses are assumed to be multifamily residential.
3. All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.
4. Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the SAP area.
5. Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.
6. Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.
7. Does not include 57.5 acres of open space preserve from the Sac State–Placer Center.

Sources: Information provided by MacKay & Somps, Mintier Harnish, and Fehr & Peers and compiled by Ascent Environmental in 2018

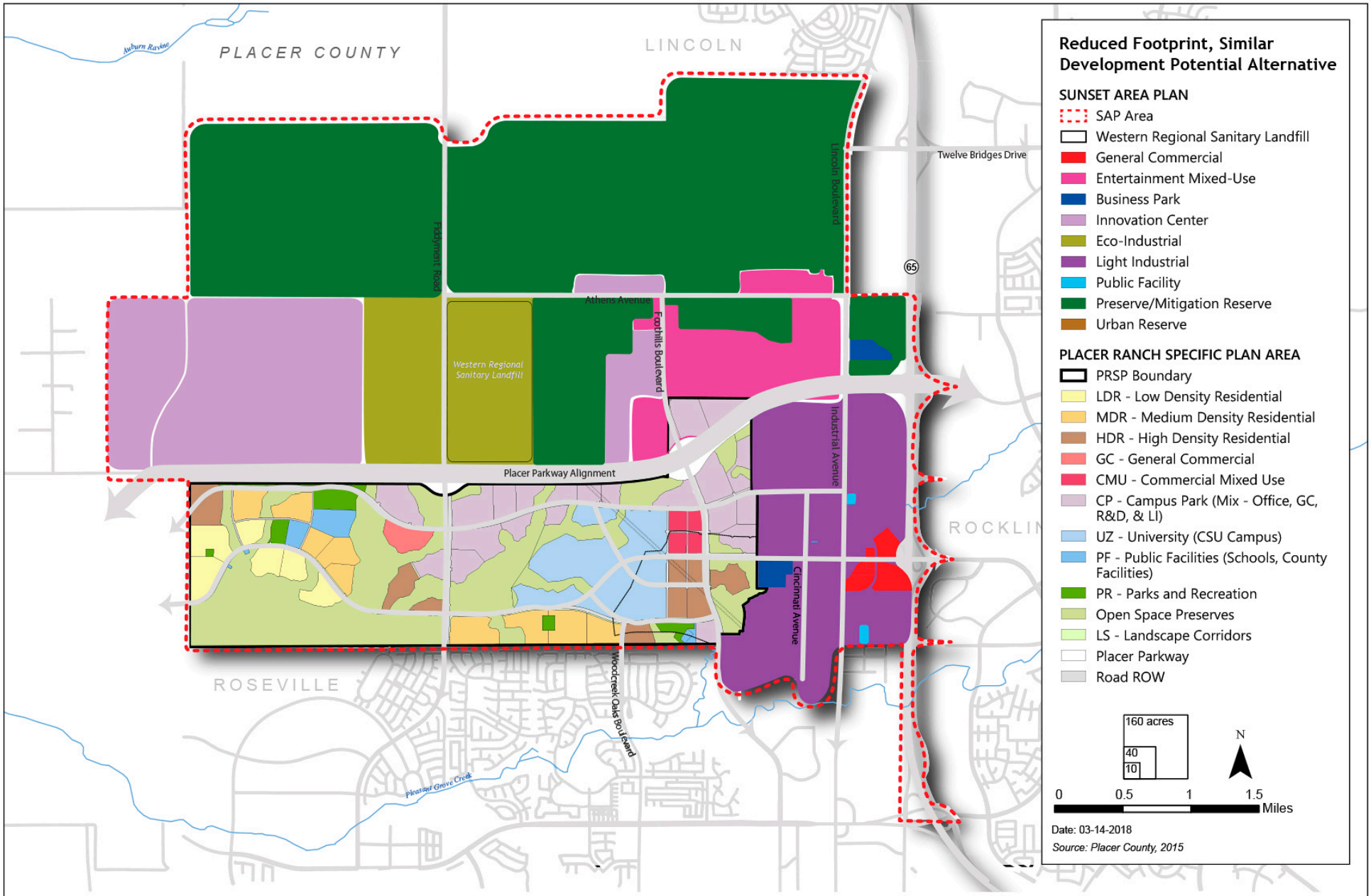
The increase in net density resulting from the alternative would alter the character of development as observed at the pedestrian level. Development overall would be more compact. There would be more attached and stacked residential units than detached single-family units, and residential structures would be taller than under the project. Nonresidential structures would also be slightly taller, and some would likely include parking structures rather than strictly surface parking. However, although the character of development would be more compact under this alternative, similar to Alternative 3, the alternative would include over 30 percent more open/space preserve throughout the project area.

COMPARISON OF ALTERNATIVE 4 AND PROJECT IMPACTS

Because the overall amount of development that would occur under the Reduced Footprint, Similar Development Potential Alternative would be similar to development resulting from the project, implementing the alternative would result in similar vehicle trip generation, energy and utility demand, and population and employment growth. Therefore, environmental impacts such as operations-related air pollutant and GHG emissions, traffic, noise, and utilities that relate closely to these types of operational characteristics would be substantially similar to those impacts resulting from the proposed project. The following discussion focuses on impacts that would potentially change as a result of this alternative, which include those impacts that depend on project footprint and associated construction and/or conversion of undeveloped land to urban uses. These impacts include aesthetics, agricultural resources, construction-related air quality emissions, biological resources, and construction-related noise.

Aesthetics

Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in more compact development, which would likely result in slightly taller and more abundant multi-story structures than would likely occur under the project. In areas where there would be a contrast between rural areas and new development, implementing the project would substantially degrade visual quality and character; however, taller and more compact development under the alternative would slightly increase the severity of this project-related significant impact. This increase in severity would be at least partially offset by the 30-percent increase in open space provided by the alternative. Furthermore, although the development footprint of the alternative is smaller than that of the project, because the overall amount of development would be similar, the alternative would involve similar levels of nighttime lighting compared to the project. Overall, the aesthetic impacts associated with the Reduced Footprint, Similar Development Potential Alternative would be **similar** to those of the proposed project.



Source: Mintier Harnish 2018, MacKay & Somps 2018

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Exhibit 6-3

Alternative 4: Reduced Footprint, Similar Development Potential

Agricultural Resources

Although the development footprint would be smaller, the Reduced Footprint, Similar Development Potential Alternative would not maintain any agricultural land use designations; therefore, even though the alternative would result in less conversion of Important Farmland to urban use, the farmland would be placed under permanent conservation, and the ability to cultivate the property would be eliminated. The impacts on agricultural resources would be **similar** between the project and the alternative.

Air Quality

The Reduced Footprint, Similar Development Alternative would result in a smaller development footprint but a similar level of development compared with the proposed project. As mentioned above, because of the similar level of development, this discussion focuses on construction-related air quality impacts. Because of the smaller footprint, construction-related air pollutant emissions would be slightly reduced. However, the mitigated construction-related NO_x emissions (for the net SAP and PRSP areas) would be over three times the PCAPCD threshold; therefore, the reduction in the project footprint by 1,500 acres (less than 20 percent of the total SAP area) would not reduce the construction-related emissions below the PCAPCD threshold. Also, although the development footprint would be reduced, Alternative 4 would place a similar number of sensitive uses within 1 mile of the WRSL; therefore, impacts related to odors would be similar. Overall, the alternative would result in **less** air quality–related impact, but the impact would still exceed the thresholds.

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in fewer acres of developed land and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent. The USFWS preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Similar Development Potential Alternative would be **less** compared to those resulting from the project.

Cultural Resources

Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in fewer acres of developed land, and, therefore, there would be a minor reduction in the potential to damage unrecorded historic sites, but given the large amount of land in the net SAP area that would still be developed under the alternative, the reduction would be inconsequential. Overall, the impacts of the Reduced Footprint, Similar Development Potential Alternative would be **similar** to those under the project.

Noise

As mentioned above, because of the similar level of development between the alternative and the project, this discussion focuses on construction-related noise impacts. Although there would be a reduction in the overall development footprint compared to the project, implementation of the Reduced Footprint, Similar Development Potential Alternative would still involve a comparable level of construction, which would include similar types of construction activities and similar types of equipment. Therefore, similar implementation measures would be required for construction noise, and construction-related impacts would be similar. Overall, impacts related to noise would be **similar** to the project.

6.4.5 Alternative 5: Reduced VMT

Section 4.14, "Transportation and Circulation," of this Draft EIR identifies significant project impacts related to VMT. Although project buildout would result in a lower VMT per capita than the existing VMT per capita generated by existing development in the project area, the project-generated VMT per capita levels would, even after implementing traffic demand management (TDM) strategies, continue to remain above the SACOG regional total VMT per capita. One of the reasons for the high level of VMT associated with the project is that the SAP EMU designation allows uses that could generate significant numbers of vehicle trips originating outside the region, such as entertainment venues and super-regional destination retail (among other uses). Large numbers of trips from vehicle traveling long distances increases VMT per capita. This alternative is designed to reduce project VMT. It should be noted that, although this alternative was designed to address increased VMT, it would also likely result in reduced GHG emission, which is also a significant impact associated with project implementation.

Traffic modeling for the 20-year scenario revealed that by removing the nonresidential development from the EMU designation, per-capita VMT decreased by more than 25 percent. Therefore, this alternative aims to achieve this VMT reduction by eliminating the nonresidential land uses in the EMU, including the regional- and super-regional-serving uses. Because this alternative focuses on reducing the trip-generating capacity of nonresidential uses in the SAP's EMU designation, the PRSP would not change substantially under this alternative. The development details of Alternative 5 are provided in Table 6-6.

Table 6-6 Development Projections of Alternative 5: Reduced Vehicle Miles Traveled

Land Use Type	PRSP Area[1]	SAP Area[2], Excluding PRSP Area	Total SAP Area
Single-Family Residential[3]	3,082 du	320 du	3,402 du
Age-Restricted Residential	1,050 du	-	1,050 du
Multifamily Residential[4]	1,504 du	-	1,504 du
Retail[5]	1,640 ksf	219 ksf	1,859 ksf
Office[6]	1,241 ksf	930 ksf	2,171 ksf
Industrial[7]	1,658 ksf	3,525 ksf	5,183 ksf
Innovation Center/R&D[8]	901 ksf	-	901 ksf
Entertainment Mixed Use	-	-	-
University	30,000 students	-	30,000 students

Notes: du = dwelling units; ksf = thousand square feet; R&D = research and development.

1. Assumes full-buildout of PRSP.
2. Assumes 20-year buildout of net SAP area.
3. All medium-density residential uses are assumed to be single-family (rather than multifamily).
4. All high-density residential uses are assumed to be multifamily residential.
5. All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100 percent retail space.
6. Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the remainder of the SAP area.
7. Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.
8. Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.

Source: Information provided by Fehr & Peers and compiled by Ascent Environmental in 2018

Overall, the Reduced VMT Alternative results in more than 20-percent reduction in nonresidential floor area in the net SAP area (in the 20-year development scenario). It should be noted that, even though this alternative would reduce per-capita VMT by 20 percent, this reduction would not be enough to reduce per-

capita VMT below the SACOG regional total (discussed in more detail below in the comparison of traffic impacts). It should also be noted that the 20-percent per-capita VMT reduction would likely diminish somewhat as the project builds out after the 20-year scenario (because the amount of nonresidential development removed becomes a smaller proportion of the overall development as the project builds out). However, even at buildout, the per-capita VMT would remain less than the proposed project VMT.

Although the development scenario differs substantially from the proposed SAP, the differences include the land use types allowed within the EMU (residential only, rather than residential and non-residential uses). Although the SAP text would be different under the alternative, the layout of the plan would remain the same as that of the proposed project. As mentioned above, the PRSP would not change substantially under this alternative; therefore, please refer to Exhibits 3-5 and 3-9 in Chapter 3.0, "Project Description," for the graphical depiction of this alternative.

COMPARISON OF ALTERNATIVE 5 AND PROJECT IMPACTS

Although the level of development that would occur under the Reduced VMT Alternative would be substantially less than that under the project, the overall layout of the project would not change, and the development footprint could be similar. Therefore, the alternative would result in similar significant impacts that relate to construction and/or the development footprint, such as impacts to agricultural resources, construction-related air quality emissions, impacts to biological resources and cultural resources, and construction-related noise impacts. The following discussion will focus on the potential impacts that could change as a result of implementing the Reduced VMT Alternative. The reduction in overall development potential would result in decreased trip generation, energy and utilities demand, and population and employment growth. This could result in potential reductions in impacts related to operational air pollutant emissions, operational GHG emissions, land use compatibility, operational noise, traffic, and utilities. Also, because less development would occur with approximately the same layout, the development would be less compact and more spread out, which could result in changes to aesthetics-related impacts. These impacts are discussed in more detail below.

Aesthetics

The Reduced VMT Alternative would result in a reduced level of development compared to the proposed project, but the layout would not change substantially. This means that there would be less development in the same overall area. (Note that most of the reduction in development would occur in the net SAP area.) This would typically result in less compact development with less vertical space (fewer stories) and lower density. The Reduced VMT Alternative would likely include lower-scale development with more single-story structures and fewer multi-story structures. Regarding nighttime lighting, the lower-scale of development could result in inconsequential reduction in night lighting because the buildings would not be as visible from far distances; however, because the overall level of development would remain the same, the overall level of nighttime lighting would be similar, and the Reduced VMT Alternative would result in nighttime lighting impacts similar to those of the project. Regarding visual quality, even with lower-scale development and implementation of policies and design guidelines, the substantial change in the visual character of the urban development contrasted against the undeveloped preserve/mitigation land would still constitute a substantial adverse change in visual quality. Therefore, although the impact under the alternative would be **less** than the project's impact as a result of the lower-scale development, the impacts related to aesthetics would still be significant.

Air Quality

The Reduced VMT Alternative would likely result in a development footprint similar to that of the project but less development than the proposed project. Therefore, as indicated above, this discussion will focus on operations-related air quality impacts. Although emissions associated with project operation would be reduced because of the lower level of development associated with the alternative, the project's operations-related emissions of NO_x would be over 50 times the PCAPCD's threshold (for development of the net SAP area alone); therefore, the operations-related emissions associated with the alternative would still exceed the PCAPCD's threshold. Impacts related to odors would be the same as under the project. Overall, the alternative would result in **less** air-quality-related impact, but the impact would still exceed the thresholds.

Greenhouse Gas Emissions

Operational emissions of GHG generally correlate to the size and intensity of a project and the associated energy consumed and VMT. Operation of the proposed project would generate a considerable amount of GHG emissions. Implementation of mitigation measures identified in the EIR would substantially reduce on-site emissions; however, emissions levels would still exceed the PCAPCD threshold. The alternative would result in less overall development than the project and would reduce per-capita VMT by over 25 percent. Although this would result in a considerable reduction in mobile-source GHG emissions associated with the project, even assuming implementation of similar mitigation, the overall GHG emissions associated with operation and the alternative would still likely be above the PCAPCD threshold. For these reasons, the GHG impact associated with the Reduced VMT Alternative would be **less** compared to the impacts resulting from the project.

Land Use

The project would place sensitive land uses in an area that is currently exposed to odors generated by the WRSL. The impact related to land use compatibility is considered significant. The Reduced VMT Alternative would place a similar number of sensitive receptors in this area. Therefore, overall, impacts related to land use compatibility would be **similar** to those of the project.

Noise

The Reduced VMT Alternative would involve approximately the same development footprint as the project and would involve a similar level of construction; therefore, as indicated above, this impact focuses on operations-related noise impacts. Although the Reduced VMT Alternative would result in substantially less development than the project, it is likely that the development of over 10 million sq. ft. of nonresidential land uses and over 6,000 residential units would result in increased traffic volumes that would substantially increase traffic noise. Also, the alternative would require extension of new roadway segments where no roads currently exist. This also results in a substantial increase in traffic noise (similar to the project). Overall, noise associated with the Reduced VMT Alternative would be **similar** to that associated with the project.

Population, Employment, and Housing

The Reduced VMT Alternative would result in the same number of residential units. Aside from the reduction of over 2,600 sq. ft. of non-residential uses in the EMU, the other non-residential land uses (retail, office, industrial, innovation center/R&D) would remain the same. The removal of the non-residential uses in the EMU would translate into reduced employment growth compared to the project; however, considering that the alternative still results in the development of over 6,000 residential units and over 10 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would result in substantial population and employment growth in the area. Although the impact would be **less** than that of the project, it would still be significant.

Transportation and Circulation

The project results in significant traffic impacts to a substantial number of roadway and transportation facilities across several jurisdictions. Implementation of the Reduced VMT Alternative would reduce the non-residential development by 20 percent compared to the project. This reduction would translate into less trip generation; however, considering that the alternative still results in the development of over 6,000 residential units and over 10 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would still result in substantial increase in traffic on the local roadway network. It is likely that the alternative would result in impacts to fewer transportation facilities and that the impacts would be less severe; however, significant impacts would be likely even with implementation of similar mitigation measures. Also, because the Reduced VMT Alternative does not include non-residential development in the SAP's EMU, including regional- and super-regional-serving uses, the VMT would be reduced by 25 percent. Although this is a considerable reduction compared to project VMT, the VMT would still remain above the SACOG regional total VMT per capita. Overall, the No-Project Alternative would result in **less** impact than the project with respect to transportation and circulation, but there would still be significant impacts.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Implementing the No-Project–1997 SIA Plan Alternative would result in reduction in the degree of project-related impacts across several environmental issues, and would avoid or substantially reduce the following significant impacts of the project:

- air quality impacts related to exposure of sensitive land uses to TAC and odors,
- land use compatibility with respect to exposure of sensitive land uses to an odor source, and
- population and employment growth.

It should be noted that the No-Project Alternative would result in a more severe significant biological resources impact associated with loss of vernal pool habitat. However, although the No-Project Alternative results in one greater impact compared to the project, it would avoid or substantially reduce three impacts and would therefore be considered the Environmentally Superior Alternative. However, implementation of the No-Project–1997 SIA Plan Alternative would not meet most of the primary project objectives for SAP and would not meet any of the primary objectives for PRSP.

State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed above and shown below in Table 6-7, all of the other alternatives result in an overall level of impact that is less than the proposed project, although none of the other alternatives avoid or substantially reduce a significant impact of the project. Among these remaining alternatives, Alternative 3 is considered environmentally superior because it results in the greatest reduction of impacts, and it appears to meet most of the project objectives.

Table 6-7 Summary Environmental Effects of the Alternatives Relative to the Significant Impacts of the Project

Environmental Topic	Proposed SAP and PRSP	Alternative 1: No-Project–1997 SIA Plan Alternative	Alternative 2: Reduced Scale	Alternative 3: Reduced Footprint, Reduced Development Potential	Alternative 4: Reduced Footprint, Similar Development Potential	Alternative 5: Reduced VMT
Aesthetics	Significant	Less	Less	Less	Similar	Less
Agricultural Resources	Significant	Less	Similar	Similar	Similar	Similar
Air Quality	Significant	Substantially less (avoids significant impact)	Similar	Less	Less	Less
Biological Resources	Significant	Greater	Similar	Less	Less	Similar
Cultural Resources	Significant	Similar	Similar	Similar	Similar	Similar
Greenhouse Gas Emissions and Climate Change	Significant	Less	Similar	Less	Similar	Less
Land Use	Significant	Substantially less (avoids significant impact)	Similar	Similar	Similar	Similar
Noise	Significant	Less	Similar	Similar	Similar	Similar
Population, Employment, and Housing	Significant	Substantially less (avoids significant impact)	Similar	Less	Similar	Less
Transportation and Circulation	Significant	Less	Similar	Less	Similar	Less