18 ALTERNATIVES ANALYSIS

18.1 Introduction

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed Whitehawk I (WHI) and Whitehawk II (WHII) projects, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; reasonable range of project alternatives and their associated impacts in comparison to the proposed projects' impacts individually and combined; and the environmentally superior alternative.

18.2 Purpose of Alternatives

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Section 15126.6(f) of CEQA Guidelines further states:

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project, or, in this case, proposed projects:

- An EIR shall describe a range of reasonable alternatives to the projects, or to the location of the projects, which would feasibly attain most of the basic objectives of the projects,

but would avoid or substantially lessen any of the significant effects of the projects, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).

- Because an EIR must identify ways to mitigate or avoid the significant effects that projects may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the projects or location of the projects which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination […] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed projects. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the projects as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the projects as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed projects with the impacts of not approving the proposed projects. The no project alternative analysis is not the baseline for determining whether the proposed projects' environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

Based on the above, reasonable alternatives to the projects must be capable of feasibly attaining most of the basic objectives of the projects. The proposed projects are being pursued with the following objectives:

1. Develop neighborhoods consistent with the Granite Bay Community Plan's (GBCP) Land Use discussion regarding Residential Opportunity Areas;
2. Reduce growth pressures on outlying areas of Placer County by efficiently utilizing the project sites to accommodate residential growth and development;

3. Provide for increased residential densities in areas containing available infrastructure, consistent with current area-wide infrastructure plans;
4. Plan for increased residential density to take advantage of the proximity of the project sites to region-serving arterials, available infrastructure, and to better support opportunities for transit;
5. Provide a sufficient number of residential units within the project sites to support necessary improvements to local and regional public service facilities.
6. Provide well-designed residential communities in close proximity to retail and restaurants, jobs, and services;
7. Expand the existing trail network in the area to provide safe routes for walking and cycling to enable convenient and active travel as a part of daily activities.
8. Add to the diversity of housing choices that can support a full range of lifestyles in Granite Bay;
9. Provide for smaller lot sizes and increased lot coverage to promote the efficient use of land, energy, and water resources within a residential community;
10. Provide neighborhoods of single-story homes to minimize the potential for land use incompatibilities with existing adjacent lower density and residential development;
11. Create high-quality neighborhoods, complementing the natural setting with a mix of residential, open-space, and recreational amenities;
12. Preserve the unique character of Granite Bay by protecting the 300-foot landscape corridor along the south side of Douglas Boulevard;
13. Design and develop projects that minimize encroachment into the existing 100-year floodplain on the sites; and,
14. Preserve existing riparian and oak woodland habitat on the project sites within permanent open space-zoned greenbelt areas.

Significant Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the projects must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed projects. The impacts identified for the proposed projects are summarized below.

Significant and Unavoidable

The EIR has determined that the following impacts of the proposed projects would remain significant and unavoidable, even after implementation of the feasible mitigation measures set forth in this EIR:

- ***Air Quality.*** The EIR determined that construction of the WHII project and the combined projects would result in a significant an unavoidable impact related to the short-term emission of criteria pollutants.

- ***Biological Resources.*** The EIR determined that the WHI, WHII, and combined projects, in combination with other reasonably foreseeable development within the GBCP area,

would result in a significant and unavoidable impact related to cumulative loss of biological habitats, including aquatic resources and woodland.

- ***Transportation and Circulation.*** Significant and unavoidable traffic impacts were not identified for implementation of the WHI project only; however, implementation of the WHII project only or the combined WHI and WHII projects would result in significant and unavoidable impacts related to transportation and traffic. Roadway segments and intersections that would experience significant and unavoidable impacts with implementation of the WHII project only are presented below.

    - Douglas Boulevard from Woodgrove Way to Seeno Avenue under the Existing Plus Project (WHII) scenario;
    - Sierra College Boulevard from Douglas Boulevard to Renaissance Creek under the Cumulative Plus Project (WHII) scenario; and
    - Douglas Boulevard from Woodgrove Way/Quail Oaks Drive to Seeno Avenue under the Cumulative Plus Project (WHII) scenario.

    Roadway segments and intersections that would experience significant and unavoidable impacts with implementation of both the WHI and WHII projects are presented below.

    - Douglas Boulevard from Cavitt Stallman Road to Woodgrove Way under the Existing Plus Projects (WHI and WHII) scenario;
    - Douglas Boulevard from Woodgrove Way to Seeno Avenue under the Existing Plus Projects (WHI and WHII) scenario;
    - Sierra College Boulevard from Douglas Boulevard to Renaissance Creek under the Cumulative Plus Projects (WHI and WHII) scenario; and
    - Douglas Boulevard from Cavitt Stallman Road South to Seeno Avenue under the Cumulative Plus Projects (WHI and WHII) scenario.

Less Than Significant with Mitigation

Significant environmental impacts (including cumulative impacts) of the proposed projects that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

- ***Aesthetics.*** The EIR determined that should project design fail to meet Placer County standards, implementation of WHI only, WHII only, or both the projects combined, could result in a substantial degradation of the existing visual character of the project sites. Furthermore, because the types of lighting and the specific locations of such lighting have not yet been determined, implementation of WHI only, WHII only, or both the projects combined, could increase the amount of light and glare generated on-site, which could be visible from the nearby residential development and roadways in the project vicinity. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a less-than-significant level.

- ***Biological Resources.*** The EIR determined that implementation of WHI only, WHII only, or both projects combined, could result in potential adverse effects to special-status plants, special-status fish, special-status amphibians, special-status birds, and birds protected under the Migratory Bird Treaty Act (MBTA). Given that the WHI only, WHII only, or both projects combined would involve the removal of trees protected by the County's Tree Preservation Ordinance, the projects could conflict with local policies and/or ordinances that protect biological resources, including tree resources. Furthermore, WHI only, WHII only, or both projects combined, could result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or state protected aquatic resources. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be less than significant.

- ***Cultural Resources.*** The EIR determined that implementation of WHI only, WHII only, or both projects combined, could result in disturbance or destruction of historical resources, unique archaeological and paleontological resources, human remains, and Tribal Cultural Resources, as defined in Public Resources Code, Section 21074. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources would be less than significant.

- ***Geology and Soils/Mineral Resources.*** The EIR determined that implementation of WHI only, WHII only, or both projects combined, could result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features. In addition, due to the potential exposure of topsoil on the proposed project sites during construction activities, implementation of WHI only, WHII only, or both projects combined could result in a significant increase in wind or water erosion of soils, either on or off the site, and result in changes in deposition, erosion, or siltation which could modify the channel of downstream water bodies. Furthermore, the WHII project could potentially create substantial risks to life and/or property associated with collapsible soils due to historic mining activity. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels. It should be noted that the WHI project site does not include any unstable soils or geologic units related to historic mining activities, and, thus, implementation of the WHI project would not create substantial risks to life and/or property associated with unstable soil units.

- ***Hazards and Hazardous Materials.*** The EIR determined that the potential exists that the project sites may contain contaminated soils and implementation of WHI only, WHII only, or both the projects combined, may result in the creation of a significant hazard to the public or the environment through the release of previously unknown contaminated soils. As such, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Hydrology and Water Quality.*** The EIR determined that implementation of WHI only, WHII only or the combined projects could result in potential construction and operational impacts related to water quality, changes in drainage patterns, and increases in

stormwater runoff rates. Although implementation of the proposed projects, either individually or combined, would not place housing units or structures within the 100-year flood plain that could redirect flood flows, the proposed projects, individually or combined, may result in minor increases in water surface elevations in Strap Ravine. However, the EIR requires mitigation in order to ensure that impacts related to hydrology and water quality are reduced to less-than-significant levels.

- ***Noise.*** The EIR determined that during construction activities, WHI only, WHII only, or both projects combined, could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the projects. Furthermore, potential impacts related to the generation of substantial ground-borne vibrations could occur should blasting be required for either proposed project or during construction of the combined projects. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Transportation and Circulation.*** The EIR determined that implementation of WHI only, WHII only, or both projects combined, would result in a potentially significant impact related to construction traffic. Implementation of the WHI project alone would not result in safety hazards; however, implementation of the WHII project alone or in combination with the WHI project would have the potential to result in impacts related to safety hazards (i.e., the need to lengthen the westbound left-turn lane at Douglas Boulevard and Seeno Avenue). Implementation of WHI alone would not have the potential to conflict with adopted policies, plans, or programs supporting alternative transportation; however, the WHII project and the combined implementation of the WHI and WHII projects could result in such conflicts (i.e., the need for a north-south crosswalk across Douglas Boulevard at the existing Seeno Avenue signal). In addition, combined implementation of WHI and WHII would result in a substantial increase in average delay during the AM peak hour at the Woodgrove Way/Quail Oaks Drive/Douglas Boulevard intersection for both the Existing Plus WHI and WHII and Cumulative Plus WHI and WHII conditions. Therefore, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Utilities and Service Systems.*** The EIR determined that the that implementation of WHI only, WHII only, or both projects combined, would result in a potentially cumulatively considerable contribution to impacts related to future wastewater infrastructure deficiencies. However, the EIR requires mitigation in order to ensure that the such impacts would be reduced to less-than-significant levels.

<u>Less Than Significant Impacts</u>

As discussed in each respective section of this EIR, the proposed project would result in no impact or a less-than-significant impact related to the following topics associated with the resource area indicated, and mitigation would not be required:

- ***Aesthetics.*** The EIR determined that impacts related to scenic vistas and scenic resources within State scenic highways would not occur with implementation of WHI only, WHII only, or both projects combined.

- ***Air Quality.*** Regarding the operation of WHI only, WHII only, or both the projects combined, the EIR determined that impacts related to violating air quality standards or contributing substantially to an existing or projected air quality violation during operations, impacts related to exposure of sensitive receptors to substantial pollutant concentrations, and creation of objectionable odors affecting a substantial number of people would be less than significant. Furthermore, construction of the WHI project would result in a less-than-significant impact related to criteria pollutants during construction.

- ***Greenhouse Gas Emission.*** The EIR determined that operation of either WHI or WHII only, or the combined projects would result in a less-than-significant impact related to GHG emissions.

- ***Geology and Soils/Mineral Resources.*** The EIR determined that impacts related to exposure of people or structures to geologic and geomorphological (i.e. avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards would be less than significant for the implementation of WHI only, WHII only, or the combined projects. In addition, a less-than-significant impact would occur with regard to mineral resources, unique geologic or physical features, and the exposure of people or structures to expansive soils for the implementation of WHI only, WHII only, or the combined projects. The WHI project was determined to be located within a site that does not include geologic or soil instability, and, consequently the impact for WHI was determined to be less than significant.

- ***Hazards and Hazardous Materials.*** The EIR determined that impacts related to the following issues would be less than significant for implementation of WHI only, WHII only, or the combined projects: creation of a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous or acutely hazardous materials; emission of hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school; being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; airport related hazards; and hazards related to wildland fires.

- ***Hydrology and Water Quality.*** The EIR determined that impacts related to groundwater resulting from implementation of WHI only, WHII only, or the combined projects would be less-than-significant.

- ***Land Use/Population and Housing.*** The EIR determined that impacts related to the following would be less than significant for implementation of WHI only, WHII only, or the combined projects: physical division of an established community; disruption or division of the physical arrangement of an established community; conflicts with GBCP

land use and zoning designations; development of incompatible uses and/or land use conflicts; induce substantial population growth in the project area; displace substantial numbers of existing housing or people; and comply with Placer County's Affordable Housing requirements.

- ***Noise.*** The EIR determined that impacts related to exposure of persons to or generation of traffic noise levels in excess of established standards would be less than significant under implementation of WHI only, WHII only, or the combined projects.

- ***Public Services and Recreation.*** The EIR determined that impacts related to substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and sheriff protection services, schools, and other government services and facilities would be less than significant with implementation of WHI only, WHII only, or the combined projects. Similarly, a less-than-significant impact would occur with regard to recreational facilities during implementation of WHI only, WHII only, or the combined projects.

- ***Transportation and Circulation.*** The EIR determined that impacts related to study intersections under Existing Plus Project Conditions would be less-than-significant for implementation of either project independently and the combined projects. Implementation of the WHI project alone under Existing Plus Project Conditions would not result in impacts to any roadway segments. In addition, implementation of the WHI project would result in a less-than-significant impact with regard to vehicle safety and transit, bicycle, and pedestrian facilities. Implementation of WHI and WHII would result in a less-than-significant impact related to the provision of emergency access.

- ***Utilities and Service Systems.*** The EIR determined that impacts related to wastewater treatment, construction of new on-site sewage systems, water supplies, energy resources, and solid waste service would be less than significant.

With the exception of the cumulative impacts discussed above related to biological resources, transportation and circulation, and utilities and service systems, the cumulative impacts associated with each remaining issue area were determined to be less than significant or less than cumulatively considerable.

As stated above, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed projects. Because the proposed projects would not result in significant impacts related to the resource areas listed above, a comparison of potential impacts associated with the aforementioned resource areas as a result of project alternatives versus the proposed projects is not provided in this chapter. Rather, consistent with CEQA Guidelines Section 15126.6(b), this chapter focuses on those resource areas and specific impacts listed above that have been identified for the proposed projects as requiring mitigation measures to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable.

18.3 Selection of Alternatives

The requirement that an EIR evaluate alternatives to the proposed projects or alternatives to the location of the proposed projects is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the projects could be attained, while reducing the magnitude of, or avoiding, one or more of the environmental impacts of the proposed projects. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to "set forth only those alternatives necessary to permit a reasoned choice." As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for "a range of reasonable alternatives" and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

Alternatives Considered But Dismissed From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

(i) failure to meet most of the basic project objectives,
(ii) infeasibility, or
(iii) inability to avoid significant environmental impacts.

Regarding item (ii), infeasibility, 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.

The off-site alternative was considered but dismissed from detailed analysis in this EIR. The reasons for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

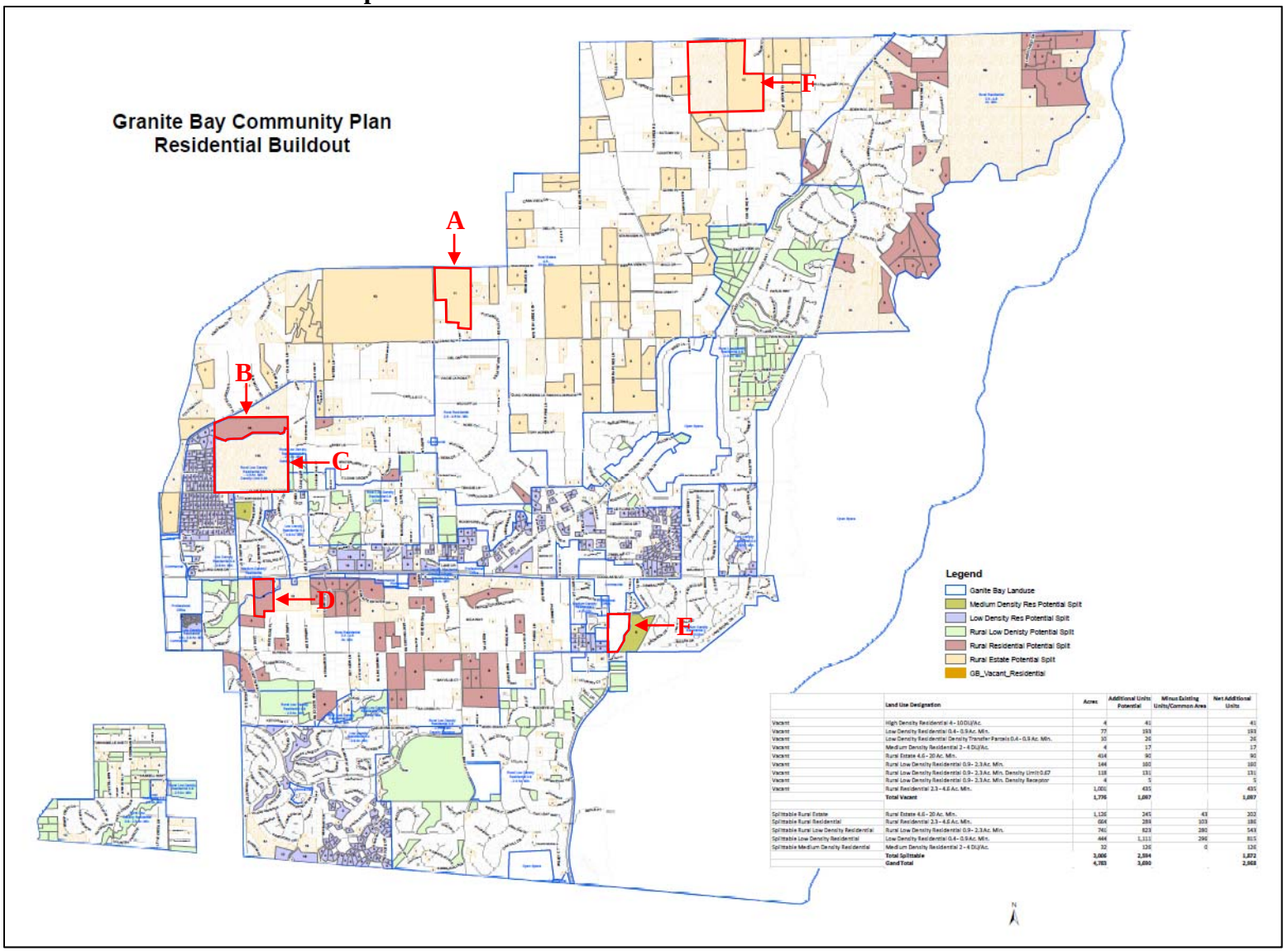
Off-Site Alternative

Off-site project locations as potential alternatives to the proposed projects were considered. Much of the GBCP area is currently built-out, and, as such, the GBCP contains few remaining undeveloped properties of sufficient size to accommodate development of the proposed projects, particularly with access to public water and sewer. Figure 18-1 below presents the sites within the GBCP of sufficient size to accommodate the proposed projects. In determining potential off-site locations, the feasibility and suitability of such locations for development of the proposed projects was considered. As shown in Figure 18-1, six sites exist within the GBCP that could accommodate either or both of the proposed projects. It should be noted that none of the off-site alternative locations identified in Figure 18-1 are under ownership or under option by the applicant. Therefore, prior to development of any of the off-site alternatives, the project applicant would need to acquire the property(ies), some, if not all, of which may not currently be available for purchase.

All of the sites presented in Figure 18-1 primarily consist of wooded areas and grassland open space, and all but one of the sites contains aquatic features including ponds and drainage courses. For instance, alternative sites A and F both contain ponds, which are fed by on-site linear drainage features or swales. In addition to the ponds located on sites A and F, sites A, B, C, D, and F include drainage features, which represent aquatic resources similar to Strap Ravine within the proposed project sites. In fact, alternative site D, the Mac Bride property, is located in between the proposed project sites and contains a portion of Strap Ravine substantively similar to the WHI and WHII project sites. Considering the existence of woodland, grassland, and aquatic habitats within the alternative sites, development of the projects on any of the alternative off-site locations would likely result in similar impacts related to biological resources.

Considering the presence of aquatic features within the majority of the off-site alternative sites, implementation of the proposed projects, individually or together, on such off-site locations would be anticipated to result in similar impacts related to hydrology and water quality, geology and soils, and cultural and tribal resources. Water and/or sewer services and infrastructure is not available at some of the undeveloped properties. In particular, site A lacks access to sewer infrastructure, while site F lacks both water and sewer access. Accordingly, impacts related to utilities could be greater at such locations.

Figure 18-1
Properties Considered for Off-Site Alternative Locations



Although primarily undeveloped, the majority of the off-site alternative locations, sites A, B, D, and F include existing structures, which would require demolition during project implementation. Depending on the age of the structures, the existing structures could contain hazardous materials, such as asbestos containing materials or lead-based paint, and demolition of such structures could result in impacts related to the potential emission of such hazardous materials.

Alternative site E is located in proximity to Auburn Folsom Road, as well as existing commercial development to the north and Willma Cavitt Junior High School. The existing development and proximity of site E to Auburn Folsom Road may subject site E to an increased degree of noise exposure from transportation and non-transportation related sources. Consequently, development of either of the proposed projects on site E may result in greater impacts related to noise.

Implementation of either or both of the proposed projects on any of the off-site alternative locations would require rezoning of the alternative sites to accommodate the density of the proposed residential land uses. In addition, unlike the proposed project sites, none of the alternative locations presented in Figure 18-1 are identified in the GBCP as "residential opportunity areas."

Overall, development of the proposed projects on any of the identified undeveloped properties within the GBCP area would result in similar, if not greater, environmental impacts. Therefore, off-site alternatives that could accomplish the project objectives or accommodate a similar type and intensity of development as the proposed projects are not considered feasible at this time. As a result, the Off-Site Alternative is dismissed from detailed evaluation.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- Buildout Pursuant to Existing Zoning Alternative; and
- Reduced Density Alternative.

Each of the project alternatives is described in detail below, with a corresponding analysis of each alternative's impacts in comparison to the proposed projects. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6[d], which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed projects. The following analysis focuses on potential impacts analyzed within this EIR. When comparing the potential impacts resulting from implementation of the foregoing alternatives, the following terminology is used:

- "Fewer" = Less than Proposed Project;
- "Similar" = Similar to Proposed Project; and
- "Greater" = Greater than Proposed Project.

When the term "fewer" is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed projects. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed projects, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term "fewer" may mean the actual elimination of an impact identified for the proposed projects altogether.

See Table 18-7 through Table 18-9 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed projects. The WHI and WHII projects are separate projects being analyzed together within this EIR. Similar to the technical analyses of the proposed projects provided throughout this EIR, the following section provides analysis of the foregoing alternatives in comparison to the implementation of WHI only, WHII only, and the combined effect of both projects.

No Project (No Build) Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

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

The County has decided to evaluate a No Project (No Build) Alternative, which assumes that the proposed project sites would remain in their current condition and would not be developed. As described in this EIR, the project sites are currently undeveloped and have been previously disturbed through mining activities. Both sites contain portions of Strap Ravine, as well as riparian woodland areas, seasonal wetlands, and foothill woodlands. Although the No Project (No Build) Alternative would not result in the disturbance of existing vegetation, the No Project (No Build) Alternative would not include protection of any existing habitat areas through

rezoning to or designation as Open Space, and, thus the No Project (No Build) Alternative would not result in the protection of on-site habitats or a 300-foot buffer from Douglas Boulevard. Thus, the No Project (No Build) Alternative would not meet the project objectives related to protection of existing on-site habitat or buffer areas or any of the other project objectives.

Aesthetics

The potential impacts to Aesthetics resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

The No Project (No Build) Alternative would consist of the continuation of the existing, undeveloped condition of the WHI project site. Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the WHI site, and would not result in disturbance of any part of the WHI project site, the No Project (No Build) Alternative would not have the potential to result in the degradation of the existing visual character of the WHI project site, nor would the No Project (No Build) Alternative result in the creation of new sources of light or glare. Thus, impacts related to aesthetics would not occur under the No Project (No Build) Alternative, and mitigation measures 4-1 and 4-2 would not be required.

WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would consist of the continuation of the existing, undeveloped condition of the WHII project site. Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the WHII site, and would not result in disturbance of any part of the WHII project site, the No Project (No Build) Alternative would not have the potential to result in the degradation of the existing visual character of the WHII project site, nor would the No Project (No Build) Alternative result in the creation of new sources of light or glare. Thus, impacts related to aesthetics would not occur under the No Project (No Build) Alternative, and mitigation measures 4-1and 4-2 would not be required.

WHI and WHII No Project (No Build) Alternative

Similar to the discussion of the individual projects above, implementation of the No Project (No Build) Alternative for both the WHI and WHII projects would consist of the continuation of the existing, undeveloped condition of the project sites. Such a continuation of existing, undeveloped conditions on the project sites would not result in the construction of new structures or any ground disturbing activity. Thus, implementation of the No Project (No Build) Alternative would not result in the degradation of the existing visual character of the project sites, nor would the No Project (No Build) Alternative result in the creation of new sources of light or glare. Thus, impacts related to aesthetics would not occur under the No Project (No Build) Alternative, and mitigation measures 4-1 and 4-2 would not be required.

Air Quality

The potential impacts to Air Quality resulting from the No Project (No Build) Alternative related to WHII only, and WHI and WHII combined are discussed below. It should be noted that the WHI project would not result in impacts to Air Quality, and, thus, is not discussed below.

WHII No Project (No Build) Alternative

Because the No Project (No Build) Alternative would not involve construction activities, the Alternative would not result in construction emissions and would not generate NO_x emissions in exceedance of the PCAPCDs significance threshold of 82 pounds per day. Thus, the significant and unavoidable impact to air quality would not occur under the No Project (No Build) Alternative, and Mitigation Measure 5-1(a) would not be required.

WHI and WHII No Project (No Build) Alternative

Because the No Project (No Build) Alternative would not involve construction activities, the Alternative would not result in construction emissions and would not generate NO_x emissions in exceedance of the PCAPCDs significance threshold of 82 pounds per day. Thus, the significant and unavoidable temporary construction impact to air quality would not occur under the No Project (No Build) Alternative, and Mitigation Measure 5-1(b) would not be required.

Biological Resources

The potential impacts to Biological Resources resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

Under the No Project (No Build) Alternative land disturbance would not occur within the WHI project site. Therefore, impacts related to biological resources would not occur under the No Project (No Build) Alternative as compared to the WHI project and the mitigation measures required in the Biological Resources chapter of this EIR would not be required.

WHII No Project (No Build) Alternative

Under the No Project (No Build) Alternative land disturbance would not occur within the WHII project site. Therefore, impacts related to biological resources would not occur under the No Project (No Build) Alternative as compared to the WHII project and the mitigation measures required in the Biological Resources chapter of this EIR would not be required.

WHI and WHII No Project (No Build) Alternative

Similar to the discussions for the individual implementation of WHI or WHII above, the No Project (No Build) Alternative would not result in land disturbance within the project sites. Therefore, impacts related to biological resources would not occur under the No Project (No

Build) Alternative as compared to the combined projects and the mitigation measures required in the Biological Resources chapter of this EIR would not be required.

Cultural Resources

The potential impacts to Cultural Resources resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

Under the No Project (No Build) Alternative land disturbance would not occur within the WHI project site. Therefore, impacts related to cultural resources would not occur under the No Project (No Build) Alternative as compared to the WHI project and the mitigation measures required in the Cultural Resources chapter of this EIR would not be required.

WHII No Project (No Build) Alternative

Under the No Project (No Build) Alternative land disturbance would not occur within the WHII project site. Therefore, impacts related to cultural resources would not occur under the No Project (No Build) Alternative as compared to the WHII project and the mitigation measures required in the Cultural Resources chapter of this EIR would not be required.

WHI and WHII No Project (No Build) Alternative

Similar to the discussions for the individual implementation of WHI or WHII above, the No Project (No Build) Alternative would not result in land disturbance within the project sites. Therefore, impacts related to cultural resources would not occur under the No Project (No Build) Alternative as compared to the combined projects and the mitigation measures required in the Cultural Resources chapter of this EIR would not be required.

Geology and Soils/Mineral Resources

The potential impacts to Geology and Soils/Mineral Resources resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

As noted above, ground-disturbing activities would not occur under the No Project (No Build) Alternative. Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would not occur within the WHI project site. Furthermore, the No Project (No Build) Alternative would not have the potential to expose top soil. Consequently, under implementation of the No Project (No Build) Alternative impacts related to geology and soils/mineral resources would not occur

and mitigation measures 8-2(a), 8-2(b), 8-2(c), 8-2(d), 8-2(e), 8-3(a), and 8-3(b) would not be required.

WHII No Project (No Build) Alternative

As noted above, ground-disturbing activities would not occur under the No Project (No Build) Alternative. Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would not occur within the WHII project site. Furthermore, the No Project (No Build) Alternative would not have the potential to expose top soil. Consequently, under implementation of the No Project (No Build) Alternative impacts related to geology and soils/mineral resources would not occur and mitigation measures 8-2(a), 8-2(b), 8-2(c), 8-2(d), 8-2(e), 8-3(a), 8-3(b), and 8-4 would not be required.

WHI and WHII No Project (No Build) Alternative

As noted above, ground-disturbing activities would not occur under the No Project (No Build) Alternative. Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would not occur within the project sites. Furthermore, the No Project (No Build) Alternative would not have the potential to expose top soil. Consequently, under implementation of the No Project (No Build) Alternative impacts related to geology and soils/mineral resources would not occur and mitigation measures 8-2(a), 8-2(b), 8-2(c), 8-2(d), 8-2(e), 8-3(a), 8-3(b), and 8-4 would not be required.

Hazards and Hazardous Materials

The potential impacts to Hazards and Hazardous Materials resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve ground-disturbing activity, and, as such, would not have the potential to expose previously unknown contaminated soils. Therefore, the No Project (No Build) Alternative would not result in impacts related to hazards and hazardous materials as compared to the WHI project and Mitigation Measure 9-2 would not be required. It should be noted that the WHI site is largely surrounded by residential development. Without buildout of the project on the site, the existing oak woodlands and understory vegetation would continue to provide a fuel source for potential fires.

WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve ground-disturbing activity, and, as such, would not have the potential to expose previously unknown contaminated soils. Therefore, the No Project (No Build) Alternative would not result in impacts related to hazards and hazardous materials as compared to the WHII project and Mitigation Measure 9-2 would not be required. It should be noted that the WHII site is largely surrounded by residential development. Without buildout of the project on the site, the existing oak woodlands and understory vegetation would continue to provide a fuel source for potential fires.

WHI and WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve ground-disturbing activity, and, as such, would not have the potential to release previously unknown contaminated soils. Therefore, the No Project (No Build) Alternative would not result in impacts related to hazards and hazardous materials as compared to the combined projects and Mitigation Measure 9-2 would not be required. It should be noted that the WHI and WHII sites are largely surrounded by residential development. Without development of the projects, the oak woodlands and understory vegetation would continue to provide a fuel source for potential fires.

Hydrology and Water Quality

The potential impacts to Hydrology and Water Quality resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

The No Project (No Build) Alternative would not alter the existing drainage pattern of the WHI site or surrounding area and would not create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. New impervious surfaces would not be introduced to the project site. In addition, contamination of downstream waterways due construction activities would not occur, and mitigation to avoid impacts associated with such would not be required. Accordingly, impacts related to hydrology and water quality would not occur under the No Project (No Build) Alternative as compared to the WHI project and implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would not be required.

WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not alter the existing drainage pattern of the WHII site or surrounding area and would not create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. New impervious surfaces would not be introduced to the project site. In addition, contamination of downstream waterways due construction activities would not occur, and mitigation to avoid impacts associated with such would not be required. Accordingly, impacts related to hydrology and water quality would not occur under the No Project (No Build)

Alternative as compared to the WHII project and implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would not be required.

WHI and WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not alter the existing drainage pattern of either of the project sites or surrounding area and would not create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. New impervious surfaces would not be introduced to the project sites. In addition, contamination of downstream waterways due construction activities would not occur, and mitigation to avoid impacts associated with such would not be required. Accordingly, impacts related to hydrology and water quality would not occur under the No Project (No Build) Alternative as compared to the combined projects and implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would not be required.

Noise

The potential impacts to Noise resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve construction activities within the WHI project site. Thus, the No Project (No Build) Alternative would not result in the generation of construction-related noise or groundborne vibrations related to blasting. Due to the absence of construction-related noise and groundborne vibrations, impacts related to such would not occur under the No Project (No Build) Alternative and mitigation measures 12-2, 12-3(a), and 12-3(b) would not be required.

WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve construction activities within the WHII project site. Thus, the No Project (No Build) Alternative would not result in the generation of construction-related noise or groundborne vibrations related to blasting. Due to the absence of construction-related noise and groundborne vibrations, impacts related to such would not occur under the No Project (No Build) Alternative and mitigation measures 12-2, 12-3(a), and 12-3(b) would not be required.

WHI and WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not involve construction activities within the project sites. Thus, the No Project (No Build) Alternative would not result in the generation of construction-related noise or groundborne vibrations related to blasting. Due to the absence of construction-related noise and groundborne vibrations, impacts related to such would not occur under the No Project (No Build) Alternative and mitigation measures 12-2, 12-3(a), and 12-3(b) would not be required.

Transportation and Circulation

The potential impacts to Transportation and Circulation resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below. It should be noted that significant traffic impacts related to implementation of WHI only would be limited to impacts due to construction activity, and, consequently, the following discussion for WHI only includes consideration of impacts related to construction activity, while the discussion of WHII and the combined projects includes consideration of operational impacts.

WHI No Project (No Build) Alternative

The No Project (No Build) Alternative would not generate construction traffic on local roadways and, thus, Mitigation Measure 14-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. Consequently, the No Project (No Build) Alternative would not result in impacts related to transportation and circulation.

WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not generate construction traffic on local roadways and, thus, Mitigation Measure 14-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. In addition, the No Project (No Build) Alternative would not result in the generation of operational trips from the project site. Because the No Project (No Build) Alternative would not involve operational vehicle trips to and from the project site, impacts related to safety hazards would not occur under the No Project (No Build) Alternative and Mitigation Measure 14-4, which requires lengthening of the westbound left-turn lane at the Douglas Boulevard/Seeno Avenue intersection, would not be necessary. Furthermore, the No Project (No Build) Alternative would not result in the significant and unavoidable impact to roadway segments along Douglas Boulevard and Mitigation Measure 14-3 would not be necessary. Lastly, Mitigation Measure 14-6 related to pedestrian improvements would not be necessary. Considering the foregoing analysis, the No Project (No Build) Alternative would not result in impacts related to transportation and circulation.

WHI and WHII No Project (No Build) Alternative

The No Project (No Build) Alternative would not generate construction traffic on local roadways and, thus, Mitigation Measure 14-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. In addition, the No Project (No Build) Alternative would not result in the generation of operational trips from the project sites. Because the No Project (No Build) Alternative would not involve operational vehicle trips to and from the project sites, impacts related to safety hazards would not occur under the No Project (No Build) Alternative and Mitigation Measure 14-4 would not be necessary. Furthermore, the No Project (No Build) Alternative would not result in the significant and unavoidable impact to roadway segments along Douglas Boulevard, and Mitigation Measure 14-3, which requires the widening of Douglas Boulevard east of Sierra College Boulevard, would not be necessary. In addition, because vehicle traffic would not be added to the Woodgrove Way/Quail Oaks Drive/Douglas Boulevard intersection, Mitigation Measures 14-2 would not be required to mitigate impacts to the

intersection. Mitigation Measure 14-6 related to pedestrian improvements would not be necessary. Considering the foregoing analysis, the No Project (No Build) Alternative would not result in impacts related to transportation and circulation.

Utilities and Service Systems

The potential cumulative impacts to Utilities and Service Systems resulting from the No Project (No Build) Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI No Project (No Build) Alternative

Under the No Project (No Build) Alternative the WHI project site would not be developed. Consequently, wastewater would not be generated from the project site, and the No Project (No Build) Alternative would not result in contributions to cumulative deficiencies in downstream infrastructure. Consequently, the No Project (No Build) Alternative would result in fewer cumulative impacts as compared to the WHI project, and Mitigation Measure 17-17 would not be required.

WHII No Project (No Build) Alternative

Similar to the discussion of the WHI project above, under the No Project (No Build) Alternative wastewater would not be generated at the WHII project site, and, thus, a contribution to cumulative downstream deficiencies would not occur. Accordingly, the No Project (No Build) Alternative would result in fewer cumulative impacts as compared to the WHII project, and Mitigation Measure 17-17 would not be required.

WHI and WHII No Project (No Build) Alternative

Similar to the discussion of the individual projects above, under the No Project (No Build) Alternative wastewater would not be generated at either project site, and, thus, a contribution to cumulative downstream deficiencies would not occur. Accordingly, the No Project (No Build) Alternative would result in fewer cumulative impacts as compared to the combined implementation of the WHI and WHII projects, and Mitigation Measure 17-17 would not be required.

Buildout Pursuant to Existing Zoning Alternative

The No Project (No Build) Alternative discussed above would be considered a “no build” alternative, wherein the existing environmental setting is maintained. However, failure to proceed with the proposed projects would not necessarily result in the preservation of the existing environmental conditions, but could rather result in the future buildout of the sites pursuant to existing County planning documents. As such, the Existing Zoning Alternative would be considered another type of “no project” alternative.

The Buildout Pursuant to Existing Zoning Alternative would consist of buildout of the proposed project sites per the current Placer County zoning designations at the maximum achievable density. As discussed in Chapter 3, Project Description, of this EIR, the current Placer County zoning designation for the WHI site is Residential Agricultural, minimum Building Site of 100,000 square feet [sf], combining Planned Residential Development of 0.5 units per acre (RA-B-100 PD=0.5), while the current zoning designation for the WHII site is Residential Agricultural, minimum Building Site of 100,000 sf. The foregoing zoning designations would allow for development of eight total residential units within the WHI project site and ten total residential units within the WHII project site. It should be noted that per the existing zoning designation of the WHII project site, 13 residential lots would be allowed on the site; however, due to the existing on-site development constraints and the GBCP-required 300-foot scenic/residential setback, the developable area is reduced such that only 10 lots could occur on-site. A potential layout of the project sites under the Buildout Pursuant to Existing Zoning Alternative is presented below Figure 18-2. Table 18-1 presents a comparison of the acreages per land use type for the WHI and WHII projects under the Buildout Pursuant to Existing Zoning Alternative and the proposed projects.

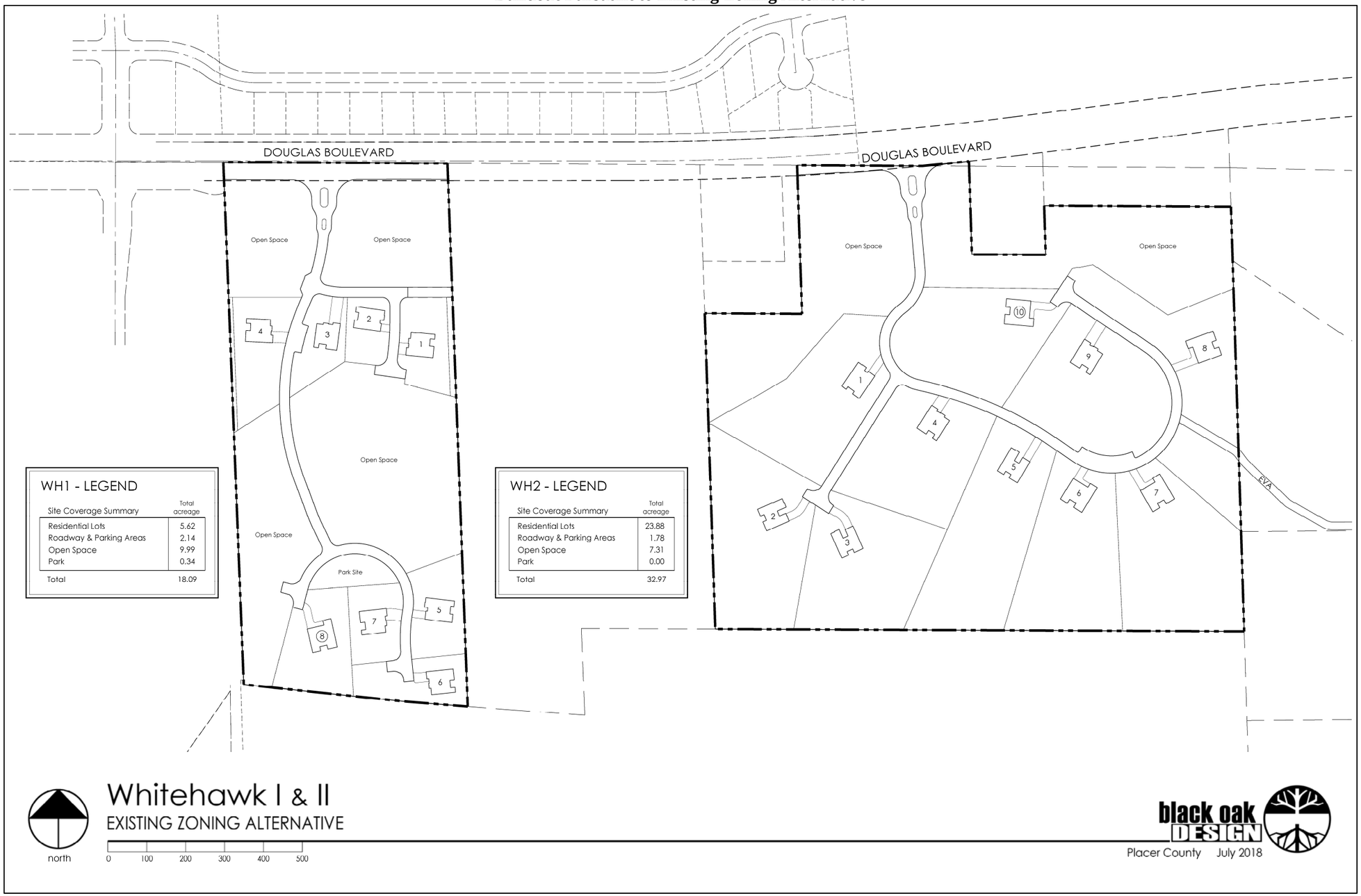
Table 18-1
Site Coverage Summary Comparison – Proposed Project vs. Buildout Pursuant to Existing Zoning Alternative

Land Use Type	WHI Buildout Pursuant to Existing Zoning Alternative (acres)	Proposed WHI (acres)	WHII Buildout Pursuant to Existing Zoning Alternative (acres)	Proposed WHII (acres)
Residential Lots	5.62	5.99	23.88	13.90
Roadway and Parking Areas	2.14	2.28	1.78	3.60
Open Space	9.99	9.49	7.31	14.60
Park	0.34	0.33	0.00	0.87
Total Acreage	**18.09**	**18.09**	**32.97**	**32.97**

As shown in Figure 18-2, the proposed configuration of both project sites would allow for the designation of Open Space areas encompassing all portions of Strap Ravine within the project sites while also maintaining a 300-foot setback from Douglas Boulevard. Residential units within the WHI and WHII project sites would be designed to preserve the existing on-site aquatic features to the maximum extent practicable.

It should be noted that although the Buildout Pursuant to Existing Zoning Alternative would include the designation of Open Space within the WHII project site, and the development of only ten residential units, the larger lot sizes for each residential unit (approximately 2.3 acres per lot) included in the Buildout Pursuant to Existing Zoning Alternative would result in a greater portion of the WHII alternative configuration being designated for residential development as compared to the area designated for development under the proposed project. Despite a larger portion of the WHII project site being designated for residential development under the Buildout Pursuant to Existing Zoning Alternative, implementation of the Alternative would only include grading and site disturbance of the building pad envelope.

Figure 18-2
Buildout Pursuant to Existing Zoning Alternative



The remaining, undisturbed areas of each lot would be protected from future development by covenants, conditions, and restrictions (CC&Rs) placed upon each lot. While the WHI project site would contain a larger portion of the site within Open Space under the Buildout Pursuant to Existing Zoning Alternative, as compared to the WHI project, the lots within the WHI project would be subject to similar CC&Rs, limiting the future development of the lots outside of the structure envelopes. The result of such CC&Rs would be that the majority of each proposed lot within the WHI and WHII sites under the Buildout Pursuant to Existing Zoning Alternative would remain undeveloped.

Implementation of the Buildout Pursuant to Existing Zoning Alternative would require off-site construction activity related to the extension of the existing water main within Douglas Boulevard. In addition, similar to the proposed project, the existing westbound U-turn lane at the Douglas Boulevard/Seeno Avenue intersection would become a left-turn lane for inbound vehicle trips accessing the WHII site. As shown in Figure 18-2, an EVA would still be required at the southeastern boundary of the WHII site.

The Buildout Pursuant to Existing Zoning Alternative would allow for development of the project sites in a manner consistent with many of the project objectives. For instance, the Buildout Pursuant to Existing Zoning Alternative would meet project objectives 1, 6, 7, 10, 11, 12, 13, and 14. However, because the Buildout Pursuant to Existing Zoning Alternative would develop the project sites with residential densities lower than that of the proposed projects, with larger lots than those included in the proposed projects, the Buildout Pursuant to Existing Zoning Alternative would not meet project objectives 3, 4, and 9. Furthermore, Granite Bay includes a larger number of large-lot and rural type developments, and the Buildout Pursuant to Existing Zoning Alternative would add to this existing stock without providing housing diversity as sought in project objective 8. Finally, considering the limited number of dwelling units included in the Buildout Pursuant to Existing Zoning Alternative as well as the existing site constraints, development of the Buildout Pursuant to Existing Zoning Alternative may not provide a sufficient number of units to support the necessary improvements to public facilities, and the Buildout Pursuant to Existing Zoning Alternative may not achieve project objective 5.

Aesthetics

The potential impacts to Aesthetics resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

The Buildout Pursuant to Existing Zoning Alternative would include development of the WHI project site with eight residences. Similar to the proposed WHI project, the development of eight new residences within the site under the WHI Buildout Pursuant to Existing Zoning Alternative would require site clearing, infrastructure work and construction of single-family residences. Such activities would have the potential to result in a substantial degradation of the visual character of the WHI site and Mitigation Measure 4-1 would still be required. While the Buildout Pursuant to Existing Zoning Alternative would involve development of fewer residential units, which would proportionally reduce the amount of potential light and glare generated by

development within the WHI site as compared to the proposed WHI project, the residential units developed under Buildout Pursuant to Existing Zoning Alternative would continue to have the potential to result in impacts related to light and glare and Mitigation Measure 4-2 would still be required. While implementation of the aforementioned mitigation measures would still be required, because the WHI Buildout Pursuant to Existing Zoning Alternative would involve development of only eight units, the reduction in the scale of development on the WHI site would be anticipated to be sufficient to reduce the potential aesthetics impacts identified for the proposed project. Therefore, Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts related to aesthetics as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

The Buildout Pursuant to Existing Zoning Alternative would include development of the WHII project site with ten residences. Similar to the proposed WHII project, development of ten new residences within the WHII site under Buildout Pursuant to Existing Zoning Alternative would require site clearing, infrastructure work and construction of single-family residences. Such activities would have the potential to result in substantial degradation of the visual character of the WHII site and Mitigation Measure 4-1 would still be required. It should be noted, however, that the residential lots on the WHII site under the Buildout Pursuant to Existing Zoning Alternative would be 2.3 acres and only the building pads would be graded, whereas, for the proposed WHII project, the entire residential area would be graded (see Figure 3-8 in the Project Description chapter of this EIR). Consequently, more trees and woodland areas would be preserved with the Alternative in comparison to the proposed project, which would help to preserve the existing visual character and quality of the site. While the WHII Buildout Pursuant to Existing Zoning Alternative would involve fewer residential units, which would reduce the amount of light and glare generated within the site, the potential to result in impacts related to light and glare would still occur and Mitigation Measure 4-2 would still be required. Although implementation of the aforementioned mitigation measures would still be required, because the Buildout Pursuant to Existing Zoning Alternative would involve development of only ten units within the WHII site, the reduced scale of development would be anticipated to be sufficient to reduce the potential aesthetics impacts identified for the proposed project. Overall, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts related to aesthetics as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the discussion of the individual projects above, implementation of the Buildout Pursuant to Existing Zoning Alternative for both the WHI and WHII projects would have the potential to result in the degradation of both project sites as well as the generation of light or glare. Therefore, implementation of the Buildout Pursuant to Existing Zoning Alternative for both WHI and WHII projects would continue to require Mitigation Measures 4-1 and 4-2. Despite the need for implementation of the foregoing mitigation measures, because the Buildout Pursuant to Existing Zoning Alternative would result in construction of fewer residential units within the project sites and retention of more on-site woodland vegetation, the Buildout Pursuant to Existing Zoning Alternative would be anticipated to result in fewer impacts.

Air Quality

The potential impacts to Air Quality resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHII only, and WHI and WHII combined are discussed below. It should be noted that the WHI project would not result in any significant impacts to Air Quality, and, thus, is not discussed below.

WHII Buildout Pursuant to Existing Zoning Alternative

The Buildout Pursuant to Existing Zoning Alternative would result in the disturbance and development of a smaller portion of the WHII project site, as compared to the WHII project. By limiting grading to the building pads and streets, the Buildout Pursuant to Existing Zoning Alternative would substantially reduce the amount of soil material needed for import to the site, and reduce the overall intensity of construction activity within the project site. As a result of reducing the amount of soil import and the intensity of the overall construction activity, the Buildout Pursuant to Existing Zoning Alternative would result in less intense construction-related NO_X emissions. While Mitigation Measure 5-1(a) may continue to be required, the mitigation would likely be sufficient to reduce emissions related to implementation of the Buildout Pursuant to Existing Zoning Alternative to levels below the PCAPCD's significance threshold. Consequently, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts, including the likely avoidance of a significant and unavoidable short-term construction impact identified for the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the discussion of the WHII project under the Buildout Pursuant to Existing Zoning Alternative provided above, the Buildout Pursuant to Existing Zoning Alternative would result in a reduction in the amount of soil material needed for import to the sites, and would reduce the overall intensity of construction activity within the project sites. Reductions in soil hauling and the intensity of construction activity would result in reductions to construction-related emissions. While Mitigation Measure 5-1(b) may continue to be required, the mitigation would likely be sufficient to reduce emissions related to implementation of the Buildout Pursuant to Existing Zoning Alternative to levels below the PCAPCD's significance threshold. Consequently, the significant and unavoidable impact identified for the proposed projects would not occur under the Buildout Pursuant to Existing Zoning Alternative. Therefore, fewer impacts related to air quality would result under the Alternative, as compared to the proposed projects.

Biological Resources

The potential impacts to Biological Resources resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Similar to the proposed WHI project, the Buildout Pursuant to Existing Zoning Alternative would include designation of portions of the WHI project site as Open Space. Despite the increased lot sizes included in the Buildout Pursuant to Existing Zoning Alternative, the Alternative would allow for a greater area of the WHI site to be designated as Open Space and remain undeveloped. Furthermore, additional areas of the WHI project site would be restricted by CC&Rs, which would ensure that the natural resources near lots remain undisturbed. Designating a larger portion of the project site as Open Space and protecting portions of each lot from future development through CC&Rs would have the effect of protecting a larger amount of habitat areas within the site and reducing the potential for the Buildout Pursuant to Existing Zoning Alternative to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Although the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of less area within the WHI site, implementation of the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of some areas of the project site. Thus, while the amount of habitat area that would be disturbed would be reduced, the Buildout Pursuant to Existing Zoning Alternative would continue to result in the disturbance of habitat and the mitigation measures included within the Biological Resources chapter of this EIR would still be required. Nevertheless, the Buildout Pursuant to Existing Zoning Alternative would result in fewer project-level and cumulative impacts than would occur under the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

While the amount of dedicated open space would be reduced under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project, CC&Rs placed on all residential lots would restrict the developable land within each lot to the proposed building pad envelope. Accordingly, the remaining areas within each lot would be protected from further development and would not be disturbed. Thus, similar to the discussion under WHI above, the Buildout Pursuant to Existing Zoning Alternative would result in a reduction in the amount of site area that would be disturbed as compared to the WHII project. By reducing the amount of the WHII site that would be disturbed, the Buildout Pursuant to Existing Zoning Alternative would reduce the potential for site development to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Therefore, while the mitigation measures included in the Biological Resources Chapter of this EIR would continue to be required to avoid impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources, the Buildout Pursuant to Existing Zoning Alternative would be considered to result in fewer project-level and cumulative impacts than would occur under the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Compared to the combined implementation of the WHI and WHII projects, the Buildout Pursuant to Existing Zoning Alternative would result in the designation of a greater amount of Open Space between the two project sites and protection of additional site area through CC&Rs for lots within both project sites. Therefore, the Buildout Pursuant to Existing Zoning Alternative

would result in disturbance to a smaller amount of total area across the project sites. The reduction in disturbance area across the project sites would reduce the potential for the Buildout Pursuant to Existing Zoning Alternative to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Nevertheless, the Buildout Pursuant to Existing Zoning Alternative would continue to have the potential to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources, and, thus, all mitigation measures included in the Biological Resources chapter of this EIR would continue to be required for the Buildout Pursuant to Existing Zoning Alternative. Although the Buildout Pursuant to Existing Zoning Alternative would require implementation of the aforementioned mitigation measures, because the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of less total site area than the combined implementation of the proposed projects, the Buildout Pursuant to Existing Zoning Alternative would result in fewer project-level and cumulative impacts than implementation of the combined projects.

Cultural Resources

The potential impacts to Cultural Resources resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

As discussed above, the Buildout Pursuant to Existing Zoning Alternative would result in a reduction in the amount of land being disturbed within the WHI project site, as compared to the land disturbance that would occur during implementation of the WHI project. The reduction in land disturbance area would result in a proportional reduction in the likelihood that implementation of the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of previously unknown cultural resources within the WHI project site. Although the likelihood of such disturbance would be reduced under implementation of the Buildout Pursuant to Existing Zoning Alternative, the Alternative would still require land disturbance within portions of the site designated for development and, thus, would continue to have the potential to result in disturbance of cultural resources. In addition, the newly-discovered cultural resource on the project site would be preserved. Therefore, the mitigation measures required in the Cultural Resources chapter of this EIR would continue to be required for the Buildout Pursuant to Existing Zoning Alternative. Despite the continued need for mitigation, the reduced area of disturbance under the Buildout Pursuant to Existing Zoning Alternative could result in fewer impacts as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the discussion for WHI above, the designation of Open Space and restriction of grading to building pads and streets only under the Buildout Pursuant to Existing Zoning Alternative would result in a reduction in the area of the WHII project site that would be disturbed as compared to the proposed project. Consequently, the Buildout Pursuant to Existing Zoning Alternative would reduce the likelihood for site development to result in disturbance of

previously unknown cultural resources. However, because the Buildout Pursuant to Existing Zoning Alternative would include some land disturbance, the mitigation measures required in the Cultural Resources chapter of this EIR would continue to be required for the Buildout Pursuant to Existing Zoning Alternative. In addition, the newly-discovered cultural resource on the project site would be preserved. Despite the continued need for mitigation, the reduced area of disturbance under the Buildout Pursuant to Existing Zoning Alternative could result in fewer impacts as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Compared to the combined implementation of the WHI and WHII projects, the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of less total land area over the WHI and WHII project sites. The reduction in land disturbance across the project sites would result in a proportional reduction in the likelihood that implementation of the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of previously unknown cultural resources within the WHI and WHII sites. Although the likelihood of such disturbance would be reduced under implementation of the Buildout Pursuant to Existing Zoning Alternative, because the Buildout Pursuant to Existing Zoning Alternative would continue to require land disturbance, the mitigation measures required in the Cultural Resources chapter of this EIR would still to be required for the Buildout Pursuant to Existing Zoning Alternative. Nevertheless, because the Buildout Pursuant to Existing Zoning Alternative would reduce the amount of land area being disturbed within the WHI and WHII project sites, the Alternative would result in fewer impacts as compared to the combined WHI and WHII projects.

Geology and Soils/Mineral Resources

The potential impacts to Geology and Soils/Mineral Resources resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Considering the designation of Open Space areas and the restriction of grading to streets and building pads within the larger 2.3-acre lots, Buildout Pursuant to Existing Zoning Alternative would include ground-disturbing activities over a smaller portion of the WHI project site, as compared to the WHI project. Because the Buildout Pursuant to Existing Zoning Alternative would result in disturbance and development of a smaller area of the WHI project site, the Buildout Pursuant to Existing Zoning Alternative would slightly reduce the potential for development within the WHI site to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion. However, because ground-disturbance and development would still occur under the Buildout Pursuant to Existing Zoning Alternative, the Alternative would still result in the potential for the foregoing impacts to occur. Therefore, implementation of the Buildout Pursuant to Existing Zoning Alternative would still require implementation of mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR.

Despite the need for continued implementation of mitigation measures, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

As discussed previously, the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance and development of a smaller portion of the WHII project site, due to the designation of Open Space within the project site and the restriction of grading to building pads and streets. While disturbance and development of the WHII project site under the Buildout Pursuant to Existing Zoning Alternative would continue to require implementation of mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR, because the Alternative would involve disturbance and development over a smaller site area, the Alternative would result in fewer impacts as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Compared to the combined implementation of the WHI and WHII projects, the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of less total land area over the project sites. The reduction in land disturbance across the project sites would result in a proportional reduction in the likelihood that implementation of the Buildout Pursuant to Existing Zoning Alternative would result in the significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion. Despite the overall reduction in the area of land subject to disturbance across the project sites, mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR for the proposed projects would still be required. Because the Buildout Pursuant to Existing Zoning Alternative would result in disturbance and development over a smaller area of the project sites, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts as compared to implementation of the combined projects.

<u>Hazards and Hazardous Materials</u>

The potential impacts to Hazards and Hazardous Materials resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Implementation of the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller portion of the WHI project site. Considering that a smaller area of the WHI project site would be disturbed, the Buildout Pursuant to Existing Zoning Alternative would result in a reduced potential for the release of previously unknown contaminated soils during site disturbance. Despite the reduction in potential for such releases to occur, some potential for the release of hazardous materials would remain and Mitigation Measure 9-2 would continue to be required for the Buildout Pursuant to Existing Zoning Alternative. Nevertheless, implementation of the Buildout Pursuant to Existing Zoning Alternative would result in

disturbance of a smaller portion of the site and, thus, could result in fewer impacts as compared to implementation of the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Implementation of the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller portion of the WHII project site. Considering that a smaller area of the WHII project site would be disturbed, the Buildout Pursuant to Existing Zoning Alternative would result in a reduced potential for the release of previously unknown contaminated soils during site disturbance. Despite the reduction in potential for such releases to occur, some potential for the release of hazardous materials would remain and Mitigation Measure 9-2 would continue to be required for the Buildout Pursuant to Existing Zoning Alternative. Nevertheless, implementation of the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller portion of the site and, therefore, could result in fewer impacts as compared to implementation of the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Compared to the combined implementation of the WHI and WHII projects, the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of less total land area within the project sites. Despite the disturbance of a smaller total area between the combined WHI and WHII project sites, the potential remains that land disturbing activities within the project sites could result in the release of previously unknown contaminated soils. Consequently, implementation of Mitigation Measure 9-2 would continue to be required. Nevertheless, implementation of the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller portion of the project sites and, consequently, could result in fewer impacts as compared to implementation of the WHI and WHII projects.

Hydrology and Water Quality

The potential impacts to Hydrology and Water Quality resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Implementation of the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller portion of the WHI project site and a reduced amount of new impervious surfaces. Accordingly, the Buildout Pursuant to Existing Zoning Alternative would reduce the potential for development within the WHI project site to alter the existing drainage pattern of the WHI site or surrounding area, or create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. Nevertheless, buildout of the Buildout Pursuant to Existing Zoning Alternative would include placement of impervious surfaces within the WHI project site, which would lead to some alteration of on-site drainage patterns, and potential increases in runoff from the site. Furthermore, construction activities associated with implementation of the Buildout Pursuant to

Existing Zoning Alternative would have the potential to result in construction-related discharge of contaminated runoff. Considering the above, development of the Alternative at the WHI site would continue to have the potential to result in impacts to hydrology and water quality, and mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required. Despite the need for implementing the foregoing mitigation measures, because the Buildout Pursuant to Existing Zoning Alternative would result in disturbance of a smaller area within the project site, the Alternative would result in fewer impacts as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the discussion of the WHI site above, under the Buildout Pursuant to Existing Zoning Alternative a smaller portion of the WHII site would be developed, which would reduce the potential for development activity within the WHII site to result in alteration of on-site drainage patterns, increases in runoff from the site, and construction-related discharge of contaminated runoff. Therefore, while mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required under the Buildout Pursuant to Existing Zoning Alternative, the Buildout Pursuant to Existing Zoning Alternative would be considered to result in fewer impacts as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Compared to the combined implementation of the WHI and WHII projects, the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance and development of less total land area within the project sites. Despite the development of a smaller total area between the combined WHI and WHII project sites, the potential remains that development of the project sites could result in impacts related to alteration of the existing drainage pattern of the WHI and WHII sites or surrounding area, creation of an increased amount of runoff water that would exceed existing or planned stormwater drainage capacity, and discharge of contaminated runoff during project construction. Consequently, mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required under the Buildout Pursuant to Existing Zoning Alternative. Despite the need for implementation of the foregoing mitigation measures, because implementation of the Buildout Pursuant to Existing Zoning Alternative would disturb a smaller area within the WHI and WHII sites and result in the construction of less impervious surfaces associated with the reduced number of residential units, the Buildout Pursuant to Existing Zoning Alternative would result in a fewer impact as compared to the combined projects.

Noise

The potential impacts to Noise resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative could require on-site blasting during construction activities on the WHI site. Such blasting activity could potentially occur within the vicinity of existing off-site sensitive receptors. Therefore, Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. Because the location of bedrock on the site is currently unknown, the need for blasting or the location of blasting activities is also unknown at this time. Due to the designation of Open Space within the project site and the restriction of grading to building pads and streets, the Buildout Pursuant to Existing Zoning Alternative would have a reduced development footprint. Depending on the location of bedrock and necessary blasting for such, the Alternative could potentially avoid more bedrock and/or involve blasting activities located further away from sensitive noise receptors. Thus, the potential exists for the Buildout Pursuant to Existing Zoning Alternative to reduce impacts related to blasting noise and vibration. However, because avoidance of such impacts is speculative at this time, the Buildout Pursuant to Existing Zoning Alternative is assumed to result in similar impacts related to noise as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative could require on-site blasting during construction activities on the WHII site. Such blasting activity could potentially occur within the vicinity of existing off-site sensitive receptors. Due to the designation of Open Space within the project site and the restriction of grading to building pads and streets, the Buildout Pursuant to Existing Zoning Alternative would have a reduced development footprint, particularly for the WHII site due to the much larger residential lot size compared to the proposed WHII project. Depending on the location of bedrock and necessary blasting for such, the Alternative could potentially avoid more bedrock and/or involve blasting activities located further away from sensitive noise receptors. Thus, the potential exists for the Buildout Pursuant to Existing Zoning Alternative to reduce impacts related to blasting noise and vibration. However, because avoidance of such impacts is speculative at this time, similar impacts are assumed to occur and Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. However, as shown in Figure 18-2, the Alternative would not involve paving activities or other ground disturbance along the southern boundary of the WHII site, and Mitigation Measure 12-2(a) related to use of vibratory rollers would not be necessary. Overall, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts related to noise as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Combined development of the WHI and WHII sites under the Buildout Pursuant to Existing Zoning Alternative could require on-site blasting. Depending on the location of bedrock and necessary blasting for such, the Alternative could potentially avoid more bedrock and/or involve blasting activities located further away from sensitive noise receptors, particularly so for the WHII site due to the much larger residential lot size compared to the proposed WHII project. Thus, the potential exists for the Buildout Pursuant to Existing Zoning Alternative to reduce impacts related to blasting noise and vibration. However, because avoidance of such impacts is

speculative at this time, similar impacts are assumed to occur and Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. However, because the Alternative would not include paving activities within close proximity to existing sensitive receptors for either site, Mitigation Measure 12-2(a) related to use of vibratory rollers would not be necessary. Overall, the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts related to noise as compared to the combined projects.

Transportation and Circulation

The potential impacts to Transportation and Circulation resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below. It should be noted that impacts related to implementation of WHI only would not result in any significant impacts to study intersections or roadway segments or pedestrian connectivity. Consequently, the following discussion for WHI only includes consideration of impacts related to construction traffic, while the discussion of WHII and the combined projects includes consideration of both construction traffic and impacts to study roadway segments. In addition, the discussion of the combined projects includes consideration of impacts to study intersections and roadway segments.

As noted above, under the Alternative, the existing westbound U-turn lane at the Douglas Boulevard/Seeno Avenue intersection would become a left-turn lane for inbound vehicle trips accessing the WHII site.

WHI Buildout Pursuant to Existing Zoning Alternative

Under the Buildout Pursuant to Existing Zoning Alternative, construction activities associated with development of the WHI site could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project site. However, because the Alternative would include fewer residences and a reduced overall disturbance area relative to the proposed WHI project, effects of construction traffic on the local roadway network would be reduced. Nonetheless, Mitigation Measure 14-1 related to preparation of a CTMP would still be required. Thus, overall, the Buildout Pursuant to Existing Zoning Alternative would result in similar impacts related to transportation and circulation as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Under the Buildout Pursuant to Existing Zoning Alternative, construction activities associated with development of the WHII site could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project site. However, because fewer residences would be constructed on the WHII site and the overall disturbance area would be reduced under the Alternative, effects related to construction traffic would be less compared to the WHII project. Similarly, because grading would be restricted to building pads and streets under the Buildout Pursuant to Existing Zoning Alternative, the amount of earthwork necessary could be reduced, particularly so for the WHII site due to the much larger residential lots compared to the proposed WHII project. Thus, the

number of associated haul trips could be reduced. Nonetheless, Mitigation Measure 14-1 related to preparation of a CTMP would still be required.

Table 18-2 below provides a comparison of the operational vehicle trip generation associated with the WHII project and the Buildout Pursuant to Existing Zoning Alternative. Trip generation associated with the proposed WHII project was sourced from the Transportation Impact Study prepared for the projects by Fehr & Peers, while trip generation associated with the Alternative was calculated using standard rates for single-family residential uses from the Institute of Traffic Engineers (ITE) Trip Generation Handbook, 9th Edition.

Table 18-2
WHII vs. Buildout Pursuant to Existing Zoning Alternative Average Weekday Trip Generation

Duration	WHII Trips (As Proposed)	WHII Trips (Buildout Pursuant to Existing Zoning Alternative)
Daily	606	95
AM Peak Hour	48	8
PM Peak Hour	61	10

Sources:
Fehr & Peers, Final Transportation Impact Study for Whitehawk I and II, 2018.

Institute of Traffic Engineers, Trip Generation Manual, 9th Edition, 2012.

As shown in the table, average daily trip generation associated with the Buildout Pursuant to Existing Zoning Alternative would be substantially reduced for the WHII site compared to the proposed project. Because the WHII project trips under Buildout Pursuant to Existing Zoning Alternative would be less than the proposed WHI project trips, and the WHI project would not result in impacts to study roadway segments, the WHII project under the Alternative would, similarly, not be expected to result in impacts to roadway segments. Because impacts to study roadway segments would not occur under the Alternative, the significant and unavoidable impact identified for the WHII project under Existing Plus WHII and Cumulative Plus WHII conditions would be avoided. It is anticipated that because vehicle traffic would be added to the westbound left turn lane of the Douglas Boulevard/Seeno Avenue intersection, Mitigation Measure 14-4 related to lengthening of the westbound left-turn lane would still be required. Furthermore, because the WHII site would be developed with residential uses, Mitigation Measure 14-6 related to pedestrian improvements would still be required. Considering the foregoing analysis, the Buildout Pursuant to Existing Zoning Alternative would result in fewer project-level and cumulative impacts as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Under the Buildout Pursuant to Existing Zoning Alternative, construction activities associated with combined development of the WHI and WHII sites could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project site. However, because fewer residences would be constructed on the project sites and the overall disturbance area would be reduced under the Alternative, effects

related to construction traffic would be fewer compared to the WHI and WHII projects. Nonetheless, Mitigation Measure 14-1 related to preparation of a CTMP would still be required.

Table 18-3 below provides a comparison of the operational vehicle trip generation associated with the proposed projects and the Buildout Pursuant to Existing Zoning Alternative.

Table 18-3
WHI and WHII Projects vs. Buildout Pursuant to Existing Zoning Alternative Average Weekday Trip Generation

Duration	WHI and WHII Trips (As Proposed)	WHI and WHII Trips (Buildout Pursuant to Existing Zoning Alternative)
Daily	889	171
AM Peak Hour	75	14
PM Peak Hour	90	18

Sources:
Fehr & Peers, Final Transportation Impact Study for Whitehawk I and II, 2018.

Institute of Traffic Engineers, Trip Generation Manual, 9th Edition, 2012.

As shown in the table, average daily trip generation associated with the Buildout Pursuant to Existing Zoning Alternative would be substantially reduced for combined development of the WHI and WHII sites compared to the proposed projects. Because, the WHI and WHII project trips combined under Buildout Pursuant to Existing Zoning Alternative would be less than the proposed WHI project trips, and the WHI project would not result in impacts to study intersections or roadway segments, the WHI and WHII projects under the Alternative would, similarly, not be expected to result in impacts to study intersections or roadway segments. Because impacts to the Woodgrove Way/Quail Oaks Drive/Douglas Boulevard intersection would not occur under the Alternative for project-level or cumulative conditions, Mitigation Measure 14-2 would not be required. Due to the lack of impacts to study roadway segments under the Alternative, the significant and unavoidable impact identified for the WHI and WHII projects under Existing Plus WHI and WHII and Cumulative Plus WHI and WHII conditions would be avoided. Mitigation Measure 14-3 related to widening of Douglas Boulevard to six lanes east of Sierra College Boulevard would not be required.

In addition, given that vehicle traffic would be added to the westbound left-turn lane of the Douglas Boulevard/Seeno Avenue intersection, Mitigation Measure 14-4 related to lengthening of the westbound left-turn lane would still be required. Furthermore, because the WHII site would be developed with residential uses, Mitigation Measure 14-6 related to pedestrian improvements would still be required. Considering the foregoing analysis, the Buildout Pursuant to Existing Zoning Alternative would result in fewer project-level and cumulative impacts as compared to the combined projects.

Utilities and Service Systems

The potential cumulative impacts to Utilities and Service Systems resulting from the Buildout Pursuant to Existing Zoning Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Buildout Pursuant to Existing Zoning Alternative

Under the Buildout Pursuant to Existing Zoning Alternative the WHI project site would be developed with eight residential units, which would be 16 fewer than would be developed with implementation of the WHI project. Operation of 16 fewer units within the WHI project site would result in a proportional decrease in the amount of wastewater generated at the project site. Although the Buildout Pursuant to Existing Zoning Alternative would result in the generation of a reduced amount of wastewater from the WHI project site, the Buildout Pursuant to Existing Zoning Alternative would result in the contribution of some level of wastewater to the wastewater infrastructure in the project area under the cumulative project setting. Upsizing of the North Trunk present within the project site would still be required. In addition, similar to the WHI project, development within the WHI site under the Buildout Pursuant to Existing Zoning Alternative would continue to be required to pay fair share fees for potential cumulative impacts to wastewater infrastructure. Because such fees are paid on an equivalent dwelling unit (EDU) basis, the amount of fair share fee payment required for development within the WHI site under the Buildout Pursuant to Existing Zoning Alternative would be proportionally reduced compared to the reduction in dwelling units. Nevertheless, considering that development within the WHI site under the Buildout Pursuant to Existing Zoning Alternative would continue to contribute cumulative wastewater flows to infrastructure identified as experiencing deficiencies in the cumulative setting and Mitigation Measure 17-17 would continue to be required, the Buildout Pursuant to Existing Zoning Alternative would result in a similar cumulative impact as compared to the WHI project.

WHII Buildout Pursuant to Existing Zoning Alternative

Under the Buildout Pursuant to Existing Zoning Alternative the WHII project site would be developed with ten residential units, which would be 45 fewer than would be developed with implementation of the WHII project. Operation of 45 fewer units within the WHII project site would result in a proportional decrease in the amount of wastewater generated at the project site. Although the Buildout Pursuant to Existing Zoning Alternative would result in the generation of a reduced amount of wastewater from the WHII project site, the Buildout Pursuant to Existing Zoning Alternative would result in the contribution of some level of wastewater to wastewater infrastructure in the project area under the cumulative project setting. Upsizing of the North Trunk present within the project site would still be required. In addition, similar to the WHII project, development within the WHII site under the Buildout Pursuant to Existing Zoning Alternative would continue to be required to pay fair share fees. Because such fees are paid on an EDU basis, the amount of fair share fee payment required for development within the WHII site under the Buildout Pursuant to Existing Zoning Alternative would be proportionally reduced compared to the reduction in dwelling units. Nevertheless, considering that development within the WHII site under the Buildout Pursuant to Existing Zoning Alternative would continue to

contribute cumulative wastewater flows to infrastructure identified as experiencing deficiencies in the cumulative setting and Mitigation Measure 17-17 would continue to be required, the Buildout Pursuant to Existing Zoning Alternative would result in a similar cumulative impact as compared to the WHII project.

WHI and WHII Buildout Pursuant to Existing Zoning Alternative

Similar to the discussion of the individual projects above, under the Buildout Pursuant to Existing Zoning Alternative wastewater would be generated at both project sites, albeit at a proportionally reduced rate. Upsizing of the North Trunk present within the project sites would still be required. Despite the reduction in wastewater generation, because cumulative operation of the Buildout Pursuant to Existing Zoning Alternative would involve generation of wastewater, the Mitigation Measure 17-17 would continue to be required, and the Buildout Pursuant to Existing Zoning Alternative would result in a similar cumulative impact as compared to implementation of the combined projects.

Reduced Density Alternative

The Reduced Density Alternative would consist of buildout of the proposed project sites at densities lower than those of the proposed project, but higher than the Buildout Pursuant to Existing Zoning Alternative. As shown in Figure 18-3, the Reduced Density Alternative would include development of 16 units within the WHI project site, which would be eight less than the proposed WHI project, and 38 units within the WHII project site, which would be 17 fewer units than the WHII project. Development of the project sites under the Reduced Density Alternative would include the provision of park sites within both the WHI and WHII project sites. The Reduced Density Alternative would include designation of Open Space within the portions of each project site that include Strap Ravine and encompass a 300-foot setback area from Douglas Boulevard. In addition, the WHII project site would include designation of an Open Space area within the southwest portion of the project site. It should be noted that under the Reduced Density Alternative the amount of designated Open Space within the WHI and WHII project sites would be increased, as compared to the amount of Open Space included in the proposed projects. Furthermore, under the Reduced Density Alternative, aquatic resources within each project site would be avoided to the maximum extent practicable.

Table 18-4 presents a comparison of the acreages per land use type for the WHI and WHII projects under the Reduced Density Alternative and the proposed projects.

Development of the Reduced Density Alternative would require off-site construction activity including the extension of the existing water main within Douglas Boulevard to the project sites. In addition, similar to the proposed project, the existing westbound U-turn lane at the Douglas Boulevard/Seeno Avenue intersection would become a left-turn lane for inbound vehicle trips accessing the WHII site. As shown in Figure 18-3, an EVA would still be required at the southeastern boundary of the WHII site.

Figure 18-3
Reduced Density Alternative

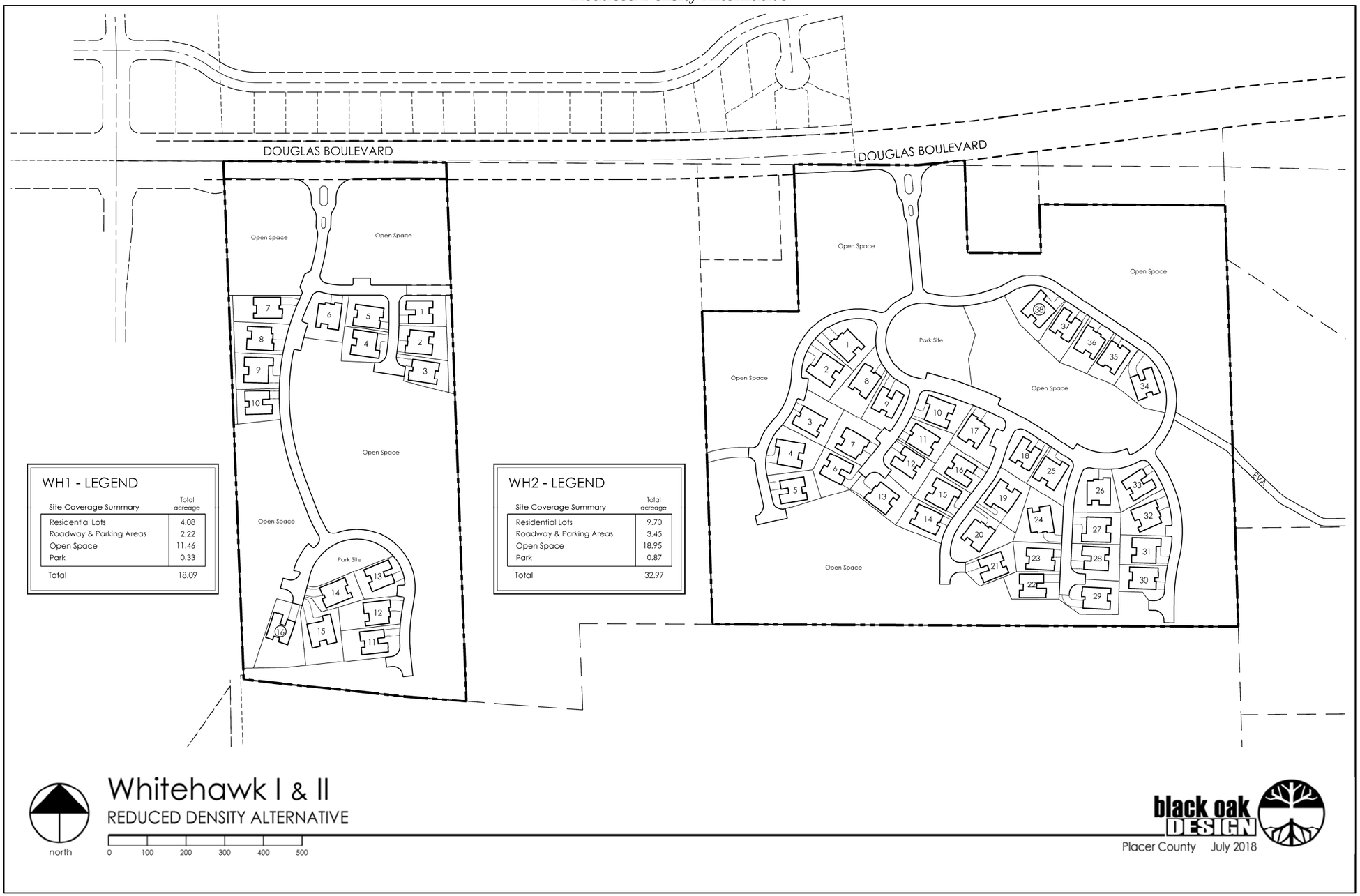


Table 18-4 Site Coverage Summary Comparison – Proposed Project vs. Reduced Density Alternative				
Land Use Type	**WHI Reduced Density Alternative (acres)**	**Proposed WHI (acres)**	**WHI Reduced Density Alternative (acres)**	**Proposed WHII (acres)**
Residential Lots	4.08	5.99	9.70	13.90
Roadway and Parking Areas	2.22	2.28	3.45	3.60
Open Space	11.46	9.49	18.95	14.60
Park	0.33	0.33	0.87	0.87
Total Acreage	**18.09**	**18.09**	**32.97**	**32.97**

The Reduced Density Alternative would allow for development of the project sites in a manner consistent with many of the project objectives. For instance, the Reduced Density Alternative would meet project objectives 1, 6, 7, 8, 9, 10, 11, 12, 13, and 14. However, because the Reduced Density Alternative would develop the project sites with residential densities lower than the proposed projects the Reduced Density Alternative would not meet project objectives 3 and 4. Considering the limited number of dwelling units included in the Reduced Density Alternative as well as the existing site constraints, development of the Reduced Density Alternative may not provide a sufficient number of units to support the necessary improvements to public facilities, and the Reduced Density Alternative may not achieve project objective 5.

Aesthetics

The potential impacts to Aesthetics resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

The Reduced Density Alternative would include development of the WHI project site with 16 residences. Similar to the proposed WHI project, the development of 16 new residences within the WHI project site, under the Reduced Density Alternative, would require site clearing, infrastructure work and construction of single-family residences which would have the potential to result in a substantial degradation of the visual character of the WHI site, and Mitigation Measure 4-1 would still be required. Development of the WHI site with 16 residences would result in a reduced intensity of light and glare compared to the proposed project. However, given that the Reduced Density Alternative would introduce new sources of light and glare to an area where few currently exist, Mitigation Measure 4-2 would still be required. Despite the need for implementation of Mitigation Measures 4-1 and 4-2 under the Reduced Density Alternative, the overall reduction in proposed housing units and site development that would occur under the Reduced Density Alternative would result in fewer impacts related to aesthetics as compared to the WHI project.

WHII Reduced Density Alternative

The Reduced Density Alternative would include development of the WHII project site with 38 residences. Similar to the proposed WHII project, the development of 38 new residences within

the WHII project site, under the Reduced Density Alternative, would require site clearing, infrastructure work and construction of single-family residences which would have the potential to result in a substantial degradation of the visual character of the WHII site, and Mitigation Measure 4-1 would still be required. It should be noted, however, that the Alternative would provide an increased buffer between the developed area on the site and the property to the west. Development of the WHII site with 38 residences would result in a reduced intensity of light and glare compared to the proposed project. Notwithstanding this, Mitigation Measure 4-2 regarding light and glare would continue to be required. Despite the need for implementation of Mitigation Measures 4-1 and 4-2 under the Reduced Density Alternative, the overall reduction in proposed housing units and site development that would occur under the Reduced Density Alternative would result in fewer impacts related to aesthetics as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Similar to the discussion of the individual projects above, implementation of the Reduced Density Alternative for both the WHI and WHII projects would have the potential to result in the degradation of visual character of both project sites as well as the generation of light or glare. Therefore, implementation of the Reduced Density Alternative for both WHI and WHII projects would continue to require implementation of mitigation measures 4-1 and 4-2. Despite the need for implementation of the foregoing mitigation measures, the overall reduction in proposed housing units and site development that would occur under the Reduced Density Alternative would result in fewer impacts related to aesthetics as compared to the combined projects.

Air Quality

The potential impacts to Air Quality resulting from the Reduced Density Alternative related to WHII only, and WHI and WHII combined are discussed below. It should be noted that the WHI project would not result in impacts to Air Quality, and, thus, is not discussed below.

WHII Reduced Density Alternative

As shown in Table 18-4, the Reduced Density Alternative would result in the disturbance and development of approximately 14.02 acres within the WHII site, compared to 18.37 acres under the WHII project. By reducing the area within the WHII site being developed and graded, the Reduced Density Alternative would reduce the amount of soil material needed for import to the site, and reduce the overall intensity of construction activity within the project site. As a result of reducing the amount of soil import and the intensity of the overall construction activity, the Reduced Density Alternative would result in less intense construction-related NO_X emissions. Although the intensity of construction-related NO_X emissions would be proportionally reduced, the Reduced Density Alternative would require site work over large portions of the WHII project site, and while the amount of soil material needed for import to the site would be reduced, a large amount of import material would likely still be required. Consequently, the Reduced Density Alternative would still require implementation of Mitigation Measure 5-1(a). Mitigation Measure 5-1(a) would reduce the potential impact related to construction of the Reduced Density Alternative within the WHII project; however, the foregoing mitigation measure may be insufficient to reduce emissions below the significance threshold. Therefore, while the Reduced

Density Alternative would result in fewer impacts as compared to the WHII project, the Reduced Density Alternative may still result in a significant and unavoidable short-term impact related to air quality.

WHI and WHII Reduced Density Alternative

The Reduced Density Alternative would result in a reduction in the amount of soil material needed for import to the sites, and would reduce the overall intensity of construction activity within the project sites. Although the amount of soil material needed for import under the Reduced Density Alternative would be reduced as compared to the proposed project, the amount of such material is still anticipated to be substantial, given the number of units and area to be developed within both project sites. Therefore, Mitigation Measure 5-1(b) would continue to be required, but may not be sufficient to reduce emissions below the significance threshold. Accordingly, while the Reduced Density Alternative would result in fewer impacts as compared to the combined projects, the Reduced Density Alternative may still result in a significant and unavoidable short-term impact related to air quality.

Biological Resources

The potential impacts to Biological Resources resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

As shown in Table 18-4 above, the Reduced Density Alternative would designate 11.46 acres of the WHI site as Open Space, compared to 9.49 acres under the proposed WHI project. Thus, the Reduced Density Alternative would allow for an additional 1.97 acres of the WHI project site to be designated as Open Space and remain undeveloped. Designating a larger portion of the project site as Open Space would have the effect of protecting a larger amount of habitat areas within the site and reducing the potential for the Reduced Density Alternative to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Although the Reduced Density Alternative would result in the disturbance of less area within the WHI site, implementation of the Reduced Density Alternative would still result in the disturbance of the project site. Thus, while the amount of habitat area that would be disturbed would be reduced by approximately 1.97 acres, the Reduced Density Alternative would continue to result in the disturbance of habitat and the mitigation measures included within the Biological Resources chapter of this EIR would still be required. Nevertheless, the Reduced Density Alternative would result in fewer project-specific and cumulative impacts than would occur under the WHI project.

WHII Reduced Density Alternative

Similar to the discussion of the Reduced Density Alternative under the WHI project above, the Reduced Density Alternative would designate 18.95 acres of the WHII site as Open Space, compared to 14.60 acres under the proposed WHII project. Thus, the Reduced Density Alternative would allow for an additional 4.35 acres the WHII project site to be designated as

Open Space and remain undeveloped. Designating a larger portion of the project site as Open Space would have the effect of protecting a larger amount of habitat areas within the site and reducing the potential for the Reduced Density Alternative to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Although the potential for such impacts would be reduced, the Reduced Density Alternative would continue to result in the disturbance of habitat and the mitigation measures included within the Biological Resources chapter of this EIR would still be required. Nevertheless, the Reduced Density Alternative would result in fewer project-specific and cumulative impacts than would occur under the WHII project.

WHI and WHII Reduced Density Alternative

Overall, the Reduced Density Alternative would designate 30.41 acres of the project sites as Open Space, compared to 24.09 acres under combined implementation of the WHI and WHII projects. Therefore, the Reduced Density Alternative would result in disturbance approximately 6.32 acres fewer across the project sites. The reduction in disturbance area across the project sites would decrease the potential for the Reduced Density Alternative to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources. Nevertheless, the Buildout Pursuant to Existing Zoning Alternative would continue to have the potential to result in impacts to special-status species, existing habitats, sensitive natural communities, and protected aquatic resources, and, thus, all mitigation measures included in the Biological Resources chapter of this EIR would still be required for the Buildout Pursuant to Existing Zoning Alternative. Nevertheless, because the Buildout Pursuant to Existing Zoning Alternative would result in the disturbance of approximately 6.32 acres less than the combined implementation of the proposed projects, the Buildout Pursuant to Existing Zoning Alternative would result in fewer project-specific and cumulative impacts than implementation of the combined projects.

Cultural Resources

The potential impacts to known and unknown Cultural Resources resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

As discussed above, the total amount of land being disturbed under the Reduced Density Alternative would be reduced by approximately 1.97 acres compared to the land disturbance that would occur during implementation of the WHI project. The reduction in land disturbance area would result in a proportional reduction in the likelihood that implementation of the Reduced Density Alternative would result in the disturbance of previously unknown cultural resources within the WHI project site. Although the likelihood of such disturbance would be reduced under implementation of the Reduced Density Alternative, the Reduced Density Alternative would require land disturbance within portions of the site designated for development and, thus, would continue to have the potential to result in disturbance unknown of cultural resources. In addition, the Alternative would preserve-in-place the bedrock milling station identified within the WHI

site. Therefore, the mitigation measures required in the Cultural Resources chapter of this EIR would continue to be required for the Reduced Density Alternative. Despite the continued need for mitigation, the reduced area of disturbance could result in fewer impacts as compared to the WHI project.

WHII Reduced Density Alternative

As discussed above, the total amount of land being disturbed under the Reduced Density Alternative would be reduced by approximately 4.35 acres compared to the land disturbance that would occur during implementation of the WHII project. For similar reasons as discussed under the WHI project above, despite the potential reduction in the likelihood for disturbance of previously unknown cultural resources within the WHII project site, the Reduced Density Alternative would still have the potential to result in the disturbance of unknown cultural resources. In addition, the Alternative would preserve-in-place the bedrock milling station identified within the WHII site. Therefore, the mitigation measures required in the Cultural Resources chapter of this EIR would still be required for the Reduced Density Alternative. Nevertheless, the reduced area of disturbance could result in fewer impacts as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Compared to the combined implementation of the WHI and WHII projects, the Reduced Density Alternative would result in the disturbance of approximately 6.32 acres fewer across the project sites. The reduction in land disturbance across the project sites would result in a proportional reduction in the likelihood that implementation of the Reduced Density Alternative would result in the disturbance of previously unknown cultural resources within the WHI and WHII project sites. Although the likelihood of such disturbance would be reduced under implementation of the Reduced Density Alternative, because the Reduced Density Alternative would continue to require land disturbance, the mitigation measures required in the Cultural Resources chapter of this EIR related to such would still be required for the Reduced Density Alternative. In addition, the Alternative would preserve-in-place the bedrock milling station identified within the project sites. Nevertheless, because the Reduced Density Alternative would reduce the amount of land area being disturbed within the WHI and WHII project sites, the Reduced Density Alternative could result in fewer impacts as compared to the combined WHI and WHII projects.

<u>Geology and Soils/Mineral Resources</u>

The potential impacts to Geology and Soils/Mineral Resources resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

Considering that the Reduced Density Alternative would result in a reduction of approximately 1.97 acres in the area of the WHI project site designated for development, as compared to the WHI project, the Reduced Density Alternative would include ground-disturbing activities over a

smaller portion of the WHI project site. Because the area of the WHI project site that would be disturbed and developed under the Reduced Density Alternative would be reduced by approximately 1.97 acres as compared to the WHI project, the potential for development within the WHI site to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion would be reduced. Although the Reduced Density Alternative would result in a reduction in the potential for the foregoing impacts to occur, ground-disturbing and development activities included in the Reduced Density Alternative would still occur and the potential to result in such impacts would still exist. Considering the potential for the Reduced Density Alternative to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion, the mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR would still be required. Despite the need for continued implementation of the aforementioned mitigation measures, the Reduced Density Alternative would result in fewer impacts as compared to the WHI project.

WHII Reduced Density Alternative

The Reduced Density Alternative would result in the disturbance and development of approximately 14.02 acres within the WHII site, compared to 18.37 acres under the WHII project. The reduction in the area of the WHII project site designated for development would slightly reduce the potential for development within the WHII site to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion. Although the Reduced Density Alternative would result in a slight reduction in the potential for the foregoing impacts to occur, ground-disturbing and development activities included in the Reduced Density Alternative would still occur, which could result in such impacts. Considering the potential for the Reduced Density Alternative to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion, mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR would still be required. Despite the need for continued implementation of the aforementioned mitigation measures, the Reduced Density Alternative would result in fewer impacts as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Compared to the combined implementation of the WHI and WHII projects, the Reduced Density Alternative would result in the disturbance of approximately 6.32 acres fewer across the project sites. The reduction in land disturbance across the project sites would result in a proportional reduction in the likelihood that implementation of the Reduced Density Alternative would result in the significant disruptions, displacements, compaction or overcrowding of on-site soils, substantial changes in topography or ground surface relief features, and top soil erosion. Despite the 6.32-acre reduction in the area of land subject to disturbance across the project sites, the remaining development areas would continue to be subject to potential impacts and the mitigation measures identified in the Geology and Soils/Mineral Resources chapter of this EIR

would still be required. Nevertheless, the Reduced Density Alternative would result in fewer impacts as compared to the combined projects.

Hazards and Hazardous Materials

The potential impacts to Hazards and Hazardous Materials resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

As discussed above, the total amount of land being disturbed under the Reduced Density Alternative would be reduced by approximately 1.97 acres compared to the land disturbance that would occur during implementation of the WHI project. Considering that a smaller portion of the WHI project site would be disturbed, the Reduced Density Alternative would result in a reduced potential for the release of previously unknown contaminated soils during site disturbance. Despite the reduction in potential for such releases to occur, some potential for the release of hazardous materials would remain and Mitigation Measure 9-2 would continue to be required for the Reduced Density Alternative. Nevertheless, implementation of the Reduced Density Alternative would result in 1.97 fewer acres of disturbance on the site and, thus, would result in fewer impacts as compared to implementation of the WHI project.

WHII Reduced Density Alternative

As discussed above, the total amount of land being disturbed under the Reduced Density Alternative would be reduced by approximately 4.35 acres compared to the land disturbance that would occur during implementation of the WHII project. Consequently, the Alternative would result in a reduced potential for the release of previously unknown contaminated soils on the WHII site during site disturbance. Despite the reduction in potential for such releases to occur, some potential for the release of hazardous materials would remain and Mitigation Measure 9-2 would continue to be required for the Reduced Density Alternative. Nevertheless, implementation of the Reduced Density Alternative would result in disturbance of approximately 4.35 fewer acres within the site and, therefore, would result in fewer impacts as compared to implementation of the WHII project.

WHI and WHII Reduced Density Alternative

Compared to the combined implementation of the WHI and WHII projects, the Reduced Density Alternative would result in the disturbance of approximately 6.32 acres fewer across the project sites. Despite the reduced disturbance area, the potential remains that land disturbing activities within the project sites could result in the release of previously unknown contaminated soils. Consequently, implementation of Mitigation Measure 9-2 would continue to be required. Nevertheless, implementation of the Reduced Density Alternative would result in disturbance of a smaller portion of the project sites and, consequently, would result in fewer impacts as compared to implementation of the combined projects.

Hydrology and Water Quality

The potential impacts to Hydrology and Water Quality resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

Implementation of the Reduced Density Alternative would result in disturbance of a smaller portion of the WHI project site and reduced amount of new impervious surfaces. Thus, the Reduced Density Alternative would reduce the potential for development within the WHI project site to alter the existing drainage pattern of the WHI site or surrounding area, or create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. Nevertheless, buildout of the Reduced Density Alternative would include placement of impervious surfaces within the WHI project site, which would lead to some alteration of on-site drainage patterns, and potential increases in runoff from the site. Furthermore, construction activities associated with implementation of the Reduced Density Alternative would have the potential to result in construction-related discharge of contaminated runoff. Considering the above, development of the Alternative would continue to have the potential to result in impacts to hydrology and water quality, and implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required. Nevertheless, because the Reduced Density Alternative would result in disturbance of a smaller area within the project site, the Reduced Density Alternative would result in fewer hydrology and water quality impacts as compared to the WHI project.

WHII Reduced Density Alternative

The Reduced Density Alternative would result in the disturbance of approximately 4.35 acres fewer within the WHII site as compared to the WHII project. Although the Reduced Density Alternative would reduce the total amount of disturbance and development area within the WHII project site, implementation of the Reduced Density Alternative would continue to include the disturbance of land within the WHII project site and the placement of impervious surfaces. Consequently, the Reduced Density Alternative would continue to have the potential to result in alteration of on-site drainage patterns, potential increases in runoff from the site, and construction-related discharge of contaminated runoff. Therefore, implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required. Nevertheless, because the Reduced Density Alternative would result in disturbance of a smaller portion of the WHII site, the Reduced Density Alternative would result in fewer hydrology and water quality impacts as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Compared to the combined implementation of the WHI and WHII projects, the Reduced Density Alternative would result in the disturbance and development of approximately 6.32 acres fewer within WHI and WHII project sites. Despite the development of a smaller total area between the combined WHI and WHII sites, the potential remains that development of the project sites could result in impacts related to alteration of the existing drainage pattern of the WHI and WHII sites

or surrounding area, creation of an increased amount of runoff water that would exceed existing or planned stormwater drainage capacity, and discharge of contaminated runoff during project construction. Consequently, implementation of mitigation measures identified in the Hydrology and Water Quality chapter of this EIR would still be required under the Reduced Density Alternative. Despite the need for implementation of the foregoing mitigation measures, because implementation of the Reduced Density Alternative would disturb a smaller area within the WHI and WHII sites and result in the construction of less impervious surfaces associated with the reduced number of residential units, the Reduced Density Alternative would result in a fewer hydrology and water quality impacts as compared to the combined projects.

Noise

The potential impacts to Noise resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

Similar to the proposed project, the Reduced Density Alternative could require on-site blasting during construction of activities on the WHI site. Such blasting activity could potentially occur within the vicinity of existing off-site sensitive receptors. Therefore, Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. Overall, the Reduced Density Alternative would result in similar impacts related to noise as compared to the WHI project.

WHII Reduced Density Alternative

Similar to the proposed project, the Reduced Density Alternative could require on-site blasting during construction activities on the WHII site. Such blasting activity could potentially occur within the vicinity of existing off-site sensitive receptors. Therefore, Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. In addition, as shown in Figure 18-3, the Alternative would likely require paving activities or other ground disturbance along the southern boundary of the WHII site, and Mitigation Measure 12-2(a) related to precluding the use of vibratory rollers within 25 feet of the nearest existing structure would still be required. Overall, the Reduced Density Alternative would result in similar impacts related to noise as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Combined development of the WHI and WHII sites under the Reduced Density Alternative could require on-site blasting and, thus, Mitigation Measure 12-2(b) related to blasting noise and vibration would be required. Because the Alternative would include paving activities within close proximity to existing sensitive receptors to the south of the WHII site, Mitigation Measure 12-2(a) related to precluding the use of vibratory rollers within 25 feet of the nearest existing structure would still be required. Overall, the Reduced Density Alternative would result in similar impacts related to noise as compared to the combined projects.

Transportation and Circulation

The potential impacts to Transportation and Circulation resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below. It should be noted that impacts related to implementation of WHI only would not result in any significant impacts related to study intersections or roadway segments. Consequently, the following discussion for WHI only includes consideration of impacts related to construction traffic, while the discussion of WHII and the combined projects includes consideration of both construction traffic and impacts to study roadway segments. In addition, the discussion of the combined projects includes consideration of impacts to study intersections.

As noted above, under the Alternative, the existing westbound U-turn lane at the Douglas Boulevard/Seeno Avenue intersection would become a left-turn lane for inbound vehicle trips accessing the WHII site. In addition, public trails would be constructed within the WHI and WHII sites as required by the GBCP.

WHI Reduced Density Alternative

Under the Reduced Density Alternative, construction activities associated with development of the WHI site could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project site. Thus, Mitigation Measure 14-1 related to preparation of a CTMP would still be required. However, because the Alternative would include fewer residences and a reduced overall disturbance area relative to the WHI project, effects of construction traffic on the local roadway network could be reduced. Overall, the Reduced Density Alternative would result in similar impacts related to transportation and circulation as compared to the WHI project.

WHII Reduced Density Alternative

Under the Reduced Density Alternative, construction activities associated with development of the WHII site could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project site. Thus, Mitigation Measure 14-1 related to preparation of a CTMP would still be required. However, because fewer residences would be constructed on the WHII site and the overall disturbance area would be reduced under the Alternative, effects related to construction traffic would be similar compared to the WHII project.

Table 18-5 below provides a comparison of the operational vehicle trip generation associated with the WHII project and the Reduced Density Alternative. Trip generation associated with the proposed WHII project was sourced from the Transportation Impact Study prepared for the projects by Fehr & Peers, while trip generation associated with the Alternative was calculated using standard rates for single-family residential uses from the Institute of Traffic Engineers (ITE) Trip Generation Handbook, 9th Edition.

Table 18-5 WHII vs. Reduced Density Alternative Average Weekday Trip Generation		
Duration	**WHII Trips (As Proposed)**	**WHII Trips (Reduced Density Alternative)**
Daily	606	362
AM Peak Hour	48	29
PM Peak Hour	61	38
Sources: *Fehr & Peers, Final Transportation Impact Study for Whitehawk I and II, 2018.* *Institute of Traffic Engineers, Trip Generation Manual, 9th Edition, 2012.*		

As shown in the table, average daily trip generation associated with the Reduced Density Alternative would be substantially reduced for the WHII site compared to the proposed project. However, the total number of trips occurring under the Alternative for the WHII site would be greater than the proposed WHI project. As such, impacts to study roadway segments under the Reduced Density Alternative cannot be ruled out. Therefore, while impacts to study roadway segments would likely be less intensive under the Alternative due to the reduced vehicle trips, the significant and unavoidable impact identified for the WHII project under Existing Plus WHII and Cumulative Plus WHII conditions could remain. Because vehicle traffic would be added to the westbound left-turn lane of the Douglas Boulevard/Seeno Avenue intersection, Mitigation Measure 14-4 related to lengthening of the westbound left-turn lane would still be required. Furthermore, because the WHII site would be developed with residential uses, Mitigation Measure 14-6 related to pedestrian improvements would still be required. Nonetheless, the Reduced Density Alternative would result in fewer project-specific and cumulative impacts as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Under the Reduced Density Alternative, construction activities associated with combined development of the WHI and WHII sites could temporarily impede traffic and cause temporary lane closures in the project vicinity, resulting in disruptions to the transportation network near the project sites. Thus, Mitigation Measure 14-1 related to preparation of a CTMP would still be required, and effects related to construction traffic would be similar compared to the WHI and WHII projects.

Table 18-6 below provides a comparison of the operational vehicle trip generation associated with the proposed projects and the Reduced Density Alternative. As shown in the table, average daily trip generation associated with the Reduced Density Alternative would be reduced for combined development of the WHI and WHII sites compared to the proposed projects. As shown in Table 18-6, the Reduced Density Alternative trip generation for the combined WHI and WHII sites would be more similar to trip generation associated with individual development of the proposed WHII project. Therefore, similar to the WHII project, impacts to the study roadway segments of Douglas Boulevard between Woodgrove Way and Seeno Avenue and Sierra College Boulevard between Douglas Boulevard and Renaissance Creek would be significant and unavoidable under Existing Plus WHI and WHII and Cumulative Plus WHI and WHII

conditions. However, Mitigation Measure 14-3 related to widening of Douglas Boulevard to six lanes east of Sierra College Boulevard would not be required.

Table 18-6
WHI and WHII Projects vs. Reduced Density Alternative Average Weekday Trip Generation

Duration	WHI and WHII Trips (As Proposed)	WHI and WHII Trips (Reduced Density Alternative)
Daily	889	514
AM Peak Hour	75	41
PM Peak Hour	90	54

Sources:
Fehr & Peers, Final Transportation Impact Study for Whitehawk I and II, 2018.

Institute of Traffic Engineers, Trip Generation Manual, 9th Edition, 2012.

In addition, under the Reduced Density Alternative, it is anticipated that the Woodgrove Way/Quail Oaks Drive/Douglas Boulevard intersection would not be significantly impacted (because the trips from this alternative are similar to WHII, for which Chapter 14 determined would not significantly impact this intersection). Thus, Mitigation Measure 14-2 would not be required to mitigate impacts to the intersection. However, because vehicle traffic would be added to the westbound left-turn lane of the Douglas Boulevard/Seeno Avenue intersection, Mitigation Measure 14-4 related to lengthening of the westbound left-turn lane would still be required. Furthermore, because the WHII site would be developed with residential uses, Mitigation Measure 14-6 related to pedestrian improvements would still be required. Considering the foregoing analysis, the Reduced Density Alternative would result in fewer project-specific and cumulative impacts as compared to the combined projects.

Utilities and Service Systems

The potential cumulative impacts to Utilities and Service Systems resulting from the Reduced Density Alternative related to WHI only, WHII only, and WHI and WHII combined are discussed below.

WHI Reduced Density Alternative

Under the Reduced Density Alternative the WHI project site would be developed with 16 residential units, which would be eight fewer than would be developed with implementation of the WHI project. Operation of eight fewer units within the WHI project site would result in a proportional decrease in the amount of wastewater generated at the project site. Although the Reduced Density Alternative would result in the generation of a reduced amount of wastewater from the WHI project site, the Reduced Density Alternative would result in the contribution of some level of wastewater to the wastewater infrastructure in the project area under the cumulative project setting. Upsizing of the North Trunk present within the project site would still be required. In addition, similar to the WHI project, development within the WHI site under the Reduced Density Alternative would continue to be required to pay fair share fees. Because such fees are paid on EDU basis, the amount of fair share fee payment required for development

within the WHI site under the Reduced Density Alternative would be proportionally reduced compared to the reduction in dwelling units. Nevertheless, considering that development within the WHI site under the Reduced Density Alternative would continue to contribute wastewater to infrastructure identified as experiencing deficiencies in the cumulative setting and Mitigation Measure 17-17 would continue to be required, the Reduced Density Alternative would result in a similar cumulative impact as compared to the WHI project.

WHII Reduced Density Alternative

Under the Reduced Density Alternative the WHII project site would be developed with 38 residential units, which would be 17 fewer than would be developed with implementation of the WHII project. Operation of 17 fewer units within the WHII project site would result in a proportional decrease in the amount of wastewater generated at the project site. Although the Reduced Density Alternative would result in the generation of a reduced amount of wastewater from the WHII project site, operation of the Reduced Density Alternative would result in the contribution of some level of wastewater to the wastewater infrastructure in the project area under the cumulative project setting. Upsizing of the North Trunk present within the project site would still be required. In addition, similar to the WHII project, development within the WHII site under the Reduced Density Alternative would be required to pay fair share fees. Because such fees are paid on an EDU basis, the amount of fair share fee payment required for development within the WHII site under the Reduced Density Alternative would be proportionally reduced compared to the reduction in dwelling units. Nevertheless, considering that development within the WHII site under the Reduced Density Alternative would continue to contribute wastewater to infrastructure identified as experiencing deficiencies in the cumulative setting and Mitigation Measure 17-17 would continue to be required, the Reduced Density Alternative would result in a similar impact as compared to the WHII project.

WHI and WHII Reduced Density Alternative

Similar to the discussion of the individual projects above, under the Reduced Density Alternative wastewater would be generated at both project sites, albeit at a proportionally reduced rate. Upsizing of the North Trunk present within the project sites would still be required. Despite the reduction in wastewater generation, because cumulative operations of the Reduced Density Alternative would involve generation of wastewater, the Mitigation Measure 17-17 would continue to be required, and the Reduced Density Alternative would result in a similar cumulative impact as compared to implementation of the combined projects.

18.4 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Designating a superior alternative depends in large part on what environmental effects one considers most important. This EIR does not presume to make this determination; rather, the determinations of which impacts are more important are left to the reader and the decision makers. Generally, the environmentally superior alternative is the one that would result in the fewest environmental impacts as a result of project implementation. However, it should be noted that the environmental considerations are one portion of the factors that must be considered by the public and the decisionmakers in deliberations on the proposed project and the alternatives. Other factors of importance include sound planning, urban design and neighborhood compatibility, economics, social factors, and fiscal considerations. In addition, the superior alternative would, ideally, still provide opportunities to achieve the project objectives.

The No Project (No Build) Alternative would not meet the project objectives related to protection of existing on-site habitat or buffer areas or any of the other project objectives. The Buildout Pursuant to Existing Zoning Alternative would meet project objectives 1, 6, 7, 10, 11, 12, 13, and 14, but would not be expected to meet project objectives 3, 4, 5, 8, and 9. The Reduced Density Alternative would meet project objectives 1, 6, 7, 8, 9, 10, 11, 12, 13, and 14, but would not be expected to meet project objectives 3, 4, or 5 .

A comparison of the WHI only, WHII only, and the combined projects impacts that would occur under each of the alternatives, as discussed in detail above, to those anticipated for the proposed projects is illustrated in Table 18-7 through Table 18-9 below. As shown in the tables, none of the impacts identified for the proposed projects would occur under the No Project (No Build) Alternative. For WHI, the Buildout Pursuant to Existing Zoning Alternative would result in similar impacts as the proposed WHI project related to noise, transportation and circulation, and utilities and service systems. Impacts to all other issue areas analyzed in this EIR would be reduced under the Alternative compared to the WHI project. As shown in Table 18-8 and Table 18-9, for WHII only and WHI and WHII combined, the Building Pursuant to Existing Zoning Alternative would result in similar impacts as the proposed projects related to utilities and service systems. Impacts to all other issue areas analyzed in this EIR would be reduced under the Alternative compared to WHII only and WHI and WHII combined.

As shown in Table 18-7, for WHI, the Reduced Density Alternative would result in similar impacts as the proposed WHI project related to noise, transportation and circulation, and utilities and service systems. Impacts to all other issue areas analyzed in this EIR would be reduced under the Alternative compared to the WHI project. As shown in Table 18-8 and Table 18-9, for WHII only and WHI and WHII combined, the Reduced Density Alternative would result in similar impacts as the proposed projects related to noise and utilities and service systems. As shown in Table 18-8 and Table 18-9, impacts to all other issue areas analyzed in this EIR would be reduced under the Alternative compared to WHII only and WHI and WHII combined.

While the Buildout Pursuant to Existing Zoning Alternative would predominantly result in fewer impacts than the Reduced Density Alternative for WHI only, WHII only, and the combined projects, the Buildout Pursuant to Existing Zoning Alternative technically qualifies as a ‘no project’ alternative and cannot be considered the environmentally superior alternative. Therefore, the Reduced Density Alternative for both projects would be considered the environmentally superior alternative to the proposed project.

Table 18-7
Comparison of Environmental Impacts for WHI Project Alternatives

Resource Area	Proposed Project	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
Aesthetics	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Biological Resources	Significant and Unavoidable	None	Fewer	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Geology and Soils/Mineral Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Noise	Less-Than-Significant with Mitigation	None	Similar	Similar
Transportation and Circulation	Less-Than-Significant with Mitigation	None	Similar	Similar
Utilities and Service Systems	Less-Than-Cumulatively Considerable with Mitigation	None	Similar	Similar
	Total Fewer:	**9**	**6**	**6**
	Total Similar:	**0**	**3**	**3**
	Total Greater:	**0**	**0**	**0**

Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."

Table 18-8
Comparison of Environmental Impacts for WHII Project Alternatives

Resource Area	Proposed Project	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
Aesthetics	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Air Quality	Significant and Unavoidable	None	Fewer	Fewer*
Biological Resources	Significant and Unavoidable	None	Fewer	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Geology and Soils/Mineral Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Noise	Less-Than-Significant with Mitigation	None	Fewer	Similar
Transportation and Circulation	Significant and Unavoidable	None	Fewer	Fewer*
Utilities and Service Systems	Less-Than-Cumulatively Considerable with Mitigation	None	Similar	Similar
	Total Fewer:	**10**	**9**	**8**
	Total Similar:	**0**	**1**	**2**
	Total Greater:	**0**	**0**	**0**

Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."

* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.

Table 18-9
Comparison of Environmental Impacts for WHI and WHII Project Alternatives

Resource Area	Proposed Project	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
Aesthetics	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Air Quality	Significant and Unavoidable	None	Fewer	Fewer*
Biological Resources	Significant and Unavoidable	None	Fewer	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Geology and Soils/Mineral Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Noise	Less-Than-Significant with Mitigation	None	Fewer	Similar
Transportation and Circulation	Significant and Unavoidable	None	Fewer	Fewer*
Utilities and Service Systems	Less-Than-Cumulatively Considerable with Mitigation	None	Similar	Similar
	Total Fewer:	**10**	**9**	**8**
	Total Similar:	**0**	**1**	**2**
	Total Greater:	**0**	**0**	**0**

Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."

* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.