

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 project, 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; a reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; 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:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable



of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines 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 project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (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 project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

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

1. Implement the County's General Plan and DCWPCP, which designate the proposed project area for residential development;
2. Provide a well-designed residential community with neighborhood identity in close proximity to jobs and services in Placer and Sacramento counties;
3. Provide for medium residential densities in areas planned for residential uses and development with accessible infrastructure, maximizing new housing opportunities while being consistent with current area-wide infrastructure plans and growth policies;
4. Add to the diversity of housing choices that can support a wider range of lifestyles in the DCWPCP Area;
5. Reduce growth pressures on outlying areas of Placer County by efficiently utilizing the project site to accommodate residential growth and development;
6. Create a high-quality neighborhood environment containing a mix of residential, open-space, and recreational land uses;
7. Provide for variable lot sizes and increased lot coverage to promote the efficient use of land, energy and water resources within a residential community;



8. Design a project that minimizes encroachment into the existing 100-year floodplain on the site while balancing the housing needs and densities and the character of the local community;
9. Provide a comprehensively planned project that protects sensitive environmental habitat and resources, including existing riparian and oak woodland habitat on the project site, within a permanent greenbelt area providing a significant public benefit;
10. Provide a planned infrastructure system with all public facilities and services necessary to meet the needs of development of the project site; and
11. Provide a number of residential units within the project site sufficient to support necessary improvements to local and regional public service facilities.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. The significance level of impacts identified in the EIR are presented below.

Less Than Significant or No Impact

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 no impact would occur related to scenic vistas, scenic resources within State scenic highways, and degradation of the existing visual character or quality of the project site and/or the site's surroundings. In addition, all cumulative impacts were determined to be either less than significant or less than cumulatively considerable.
- ***Air Quality and Greenhouse Gas Emissions.*** The EIR determined that cumulative impacts related to the generation of greenhouse gas (GHG) emissions during construction and operation of the proposed project would be less than cumulatively considerable.
- ***Biological Resources.*** The EIR determined that impacts related to special-status vernal pool branchiopods and amphibian species, as well as impacts to wildlife movement corridors, would be less than significant.
- ***Cultural Resources.*** The EIR determined that impacts related to historical resources would be less than significant.
- ***Geology and Soils/Mineral Resources.*** The EIR determined that impacts related to earthquake fault rupture, strong seismic ground shaking, and seismic-related ground failure, including liquefaction, and landslides, would be less than significant. In addition, impacts to mineral resources and cumulative increases in the potential for geological related impacts and hazards would be less than significant.
- ***Hazards and Hazardous Materials.*** The EIR determined that the proposed project would result in no impact or less-than-significant impacts for all issues related to hazards and hazardous materials.



- **Hydrology and Water Quality.** The EIR determined that impacts related to groundwater, as well as cumulative impacts related to water quality and drainage, would be less-than-significant. Furthermore, the project would result in a less-than-significant impact related to the risk of release of pollutants due to project inundation in a flood hazard zone.
- **Land Use and Planning/Population and Housing/Agricultural Resources.** The EIR determined that the proposed project would result in no impact or less-than-significant impacts for all issues related to land use and planning, population and housing, and agricultural resources.
- **Noise.** The EIR determined that impacts related to generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, including cumulative impacts, would be less than significant. In addition, a less than significant impact would occur related to groundborne vibration. No impact would occur related to aircraft noise.
- **Public Services.** The EIR determined that all impacts related to public services, including cumulative impacts, would be less than significant.
- **Transportation and Circulation.** The EIR determined that impacts related to study roadway segments, transit, bicycle, and pedestrian facilities under Existing Plus Project Conditions would be less-than-significant. In addition, a less-than-significant impact would occur with regard to emergency access and access to nearby uses, hazardous design features, and incompatible uses. Under Cumulative Plus Project conditions, a less-than-cumulatively considerable impact would occur related to study roadway segments.
- **Utilities and Service Systems.** The EIR determined that all impacts related to utilities and service systems would be less than significant.

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 project. Because the proposed project 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 project is not provided in this chapter. Rather, this chapter focuses on those resource areas and specific impacts listed below that have been identified for the proposed project as requiring mitigation to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable.

Less Than Significant with Mitigation

Environmental impacts (including cumulative impacts) of the proposed project 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 because the types of lighting and the specific locations have not yet been determined, implementation of the proposed project could increase the amount of light and glare generated on-site, which could be visible from the surrounding residential development and roadways in the project vicinity. However, the



EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

- **Air Quality and Greenhouse Gas Emissions.** The EIR determined that implementation of the proposed project could conflict with or obstruct implementation of the applicable air quality plan during project construction and operation. Due to construction of the proposed sewer lift station, the project could result in impacts related to emissions (such as those leading to odors) adversely affecting a substantial number of people. In addition, the project could result in a cumulative impact related to operational emissions of reactive organic gasses (ROG). However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.
- **Biological Resources.** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, burrowing owl, Swainson's hawk, other special-status birds and birds protected under the Migratory Bird Treaty Act (MBTA), and special-status bats. Given that the proposed project would involve the removal of trees protected by the County's Tree Preservation Ordinance, the project could conflict with local policies and/or ordinances that protect biological resources, including tree resources. Furthermore, the project 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. Based on the project-level conclusions, the proposed project's incremental contribution to the cumulative loss of habitat for special-status species could be considered considerable. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be reduced to less-than-significant levels.
- **Cultural Resources.** The EIR determined that implementation of the proposed project could result in disturbance or destruction of unique archaeological resources, human remains, and Tribal Cultural Resources, as defined in Public Resources Code, Section 21074, or have the potential to cause a physical change which would affect unique cultural values, restrict existing religious or sacred uses within the potential impact area. Combined with buildout of the DCWPCP, such disturbance/destruction could result in a cumulatively considerable contribution to a significant cumulative impact related to cultural resources. However, the EIR requires mitigation in order to ensure that impacts, including cumulative impacts, related to cultural resources would be less than significant.
- **Geology and Soils/Mineral Resources.** The EIR determined that implementation of the proposed project could result in potentially significant impacts related to soil erosion and/or loss of topsoil, unstable geologic units/soils, destruction of unique paleontological resources, disruptions, displacements, compaction, or overcrowding of the on-site soils, and substantial changes to topography or ground surface relief features. However, 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 the proposed project could result in potential construction and operational impacts related to water quality, changes in drainage patterns, placement of housing or improvements in a flood hazard area, and increases in stormwater runoff rates during operation of the proposed



project. 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, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.
- **Transportation and Circulation.** The EIR determined that implementation of the proposed project would result in a significant impact related to construction traffic. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

Significant and Unavoidable

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

- **Transportation and Circulation.** The EIR determined that the proposed project could result in a significant and unavoidable impact to the Baseline Road/Brady Lane intersection under Existing Plus Project conditions. In addition, significant and unavoidable impacts were identified for the following study intersections under Cumulative Plus Project conditions:
 - Baseline Road/Brady Lane (City of Roseville);
 - Cook Riolo Road/Vineyard Road; and
 - Vineyard Road/Brady Lane.

18.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. 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.

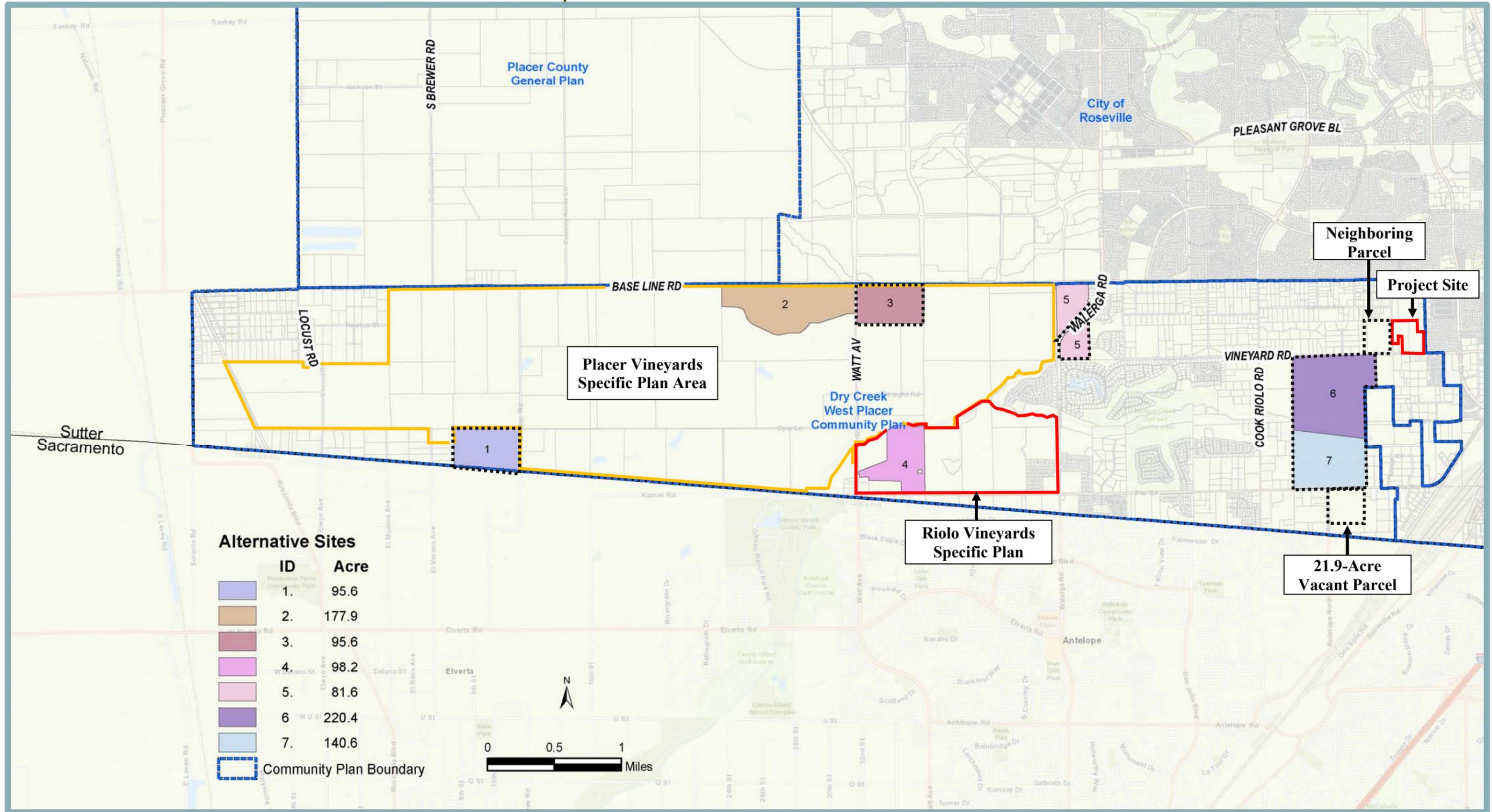
The off-site alternative was considered but dismissed from detailed analysis in this EIR. The reason(s) for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

Off-Site Alternative

The possibility of an off-site location was considered as an alternative to the project. The County’s Geographic Information System (GIS) database was consulted to provide information regarding vacant properties in the DCWPCP of sufficient size to accommodate the proposed project. The locations of such properties are illustrated in Figure 18-1 below; of the seven properties shown, the County has chosen to focus on Parcels 1, 3, 5, 6, and 7, as well as a 21.9-acre vacant property located southeast of the intersection of PFE Road and Antelope Road (portion of the formerly proposed Mill Creek Project) and the vacant parcel immediately west of the project site. In considering sites potentially available for future development, the objectives of the proposed project were used to assess the suitability of available sites. It should be noted that Parcel 2 has been dismissed from further analysis, as a Small Lot Vesting Tentative Subdivision Map has been approved by the County for the parcel. Parcel 4 was dismissed from further analysis due to environmental site constraints related to agricultural and biological resources. Furthermore, approximately 20.3 acres of Parcel 4 are designated for agricultural uses per the Riolo Vineyards Specific Plan.



Figure 18-1
Properties Considered for Off-Site Alternative



Parcel 1 (95.6 acres) is located outside of a Specific Plan area and includes sufficient acreage to accommodate a density of single-family units similar to the proposed project. However, access to the property is limited, as compared to the proposed project. The primary access road, Palladay Road, is a very narrow roadway that transitions to an unmaintained dirt road along the parcel's eastern boundary. In addition, Parcel 1 is made up of land used for agricultural purposes interspersed with sensitive drainage features. Given that development of an off-site alternative on the parcel would require development of land that is currently used for agriculture, unlike the proposed project, as well as potential disturbance of riparian habitat, biological and agricultural resources impacts would be expected to increase. Similar to the proposed project site, Parcel 1 is also located in close proximity to existing rural single-family residential development.

A small lot map has not yet been approved for Parcel 3; however, a conceptual lot plan including a mix of medium- and high-density residential units has been prepared for the site. Per the Placer Vineyards Specific Plan EIR, Parcel 3 contains extensive seasonal wetland features.¹ As such, impacts related to biological resources associated with construction of a residential subdivision on Parcel 3 would likely be greater compared to the proposed project. Furthermore, development of an off-site alternative within Parcel 3 would require payment of fees through the Placer Vineyards Specific Plan Fee Program, as well as various other fees imposed on development within the planning area. Such fees could reduce the economic feasibility of the proposed project.

Parcel 5 (81.6 acres) consists of two undeveloped properties located north and south of Walerga Road. The southern property (33.6 acres) is of a sufficient size to accommodate the proposed project. However, the property is covered in annual grassland and various sensitive aquatic habitats. As such, development of the proposed project on this off-site property would not be expected to reduce impacts to biological resources. In addition, the property owner is currently under contract with a representative to process entitlements through the County for potential non-residential uses (private high school) and residential uses on the parcel.

Parcels 6 (220.4 acres) and 7 (140.6 acres) are both transected by riparian drainages, which would limit the developable area of the sites. In addition, Dry Creek forms the approximate border between both properties, which would further limit the developable area of the two parcels. Impacts related to biological resources would likely be greater with buildout of the proposed project on Parcel 6 or Parcel 7 than what is anticipated for the proposed project. Furthermore, Parcel 6 is bordered by existing industrial uses to the east and rural residential development to the west. Parcel 7 is currently under a Williamson Act contract and contains extensive agricultural uses. Accordingly, impacts related to incompatible uses would be greater with buildout of the project on Parcel 6 or 7 compared to the project site. The Dry Creek Wastewater Treatment Plant is located directly adjacent to the eastern boundary of Parcel 7, which could result in potential impacts related to exposure of future residents to odors, though this would not be considered an impact of the project on the environment and, thus, would not be considered a CEQA issue.

The 21.9-acre vacant property located southeast of the intersection of PFE Road and Antelope Road contains a riparian corridor along two unnamed tributaries to Dry Creek. In addition, the property is bordered by industrial uses to the south. Per the County General Plan, a buffer area would be required along the southern boundary of the property in order to allow for the development of residential units. The existing riparian drainage and adjacent industrial uses substantially limit the developable area on the property. Thus, development of a project with

¹ Placer County. *Revised Draft Environmental Impact Report, Volume I, for Placer Vineyards Specific Plan, Placer County, California* [Figure 4.4-1]. March 2006.



similar lot sizes and a similar number of lots as the proposed project on the property would be infeasible. In addition, similar to the proposed project, development of the 21.9-acre property would require construction of a sewer lift station and construction of off-site sewer infrastructure. Therefore, development of the parcel would likely result in similar or greater impacts related to air quality and GHG emissions compared to the proposed project. Development of the parcel would not be anticipated to reduce any of the impacts identified for proposed project in this EIR.

The parcel immediately to the west of the project site, along Vineyard Road, is currently vacant and undeveloped. However, as noted in Chapter 11 of this EIR, the property is currently zoned Farm-Development Reserve (F-DR) and is designated as Agricultural Land per the DCWPCP Environmental Resources Element. Thus, the parcel has been previously anticipated for agricultural uses. Development of the parcel would result in greater impacts related to agricultural resources compared to the proposed project. In addition, given that the parcel is not located adjacent to the City of Roseville city limits, as is the case for the project site, development of the parcel with a residential subdivision would not be considered as definitive of an extension of existing growth patterns.

It is also important to consider that the project site is located in an area served by existing regional infrastructure and arterial roadways, and is located adjacent to existing urban development in the City of Roseville, as well as existing and planned urban areas within Placer County. Development of the proposed project at an alternative location within Placer County would be anticipated to require the extension of additional infrastructure and public services compared to the project site, and would not likely represent an efficient use of existing public investments. In addition, an off-site alternative would require an expansion of urban uses into areas within Placer County that are designated under the General Plan for agricultural use or to areas less suitable for development compared to the project site due to environmental or habitat constraints.

Overall, off-site alternatives that could accomplish the project objectives or accommodate a similar type and intensity of development as the proposed project are not considered feasible. 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.

See Table 18-7 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

It should be noted that the proposed project could potentially include the construction of up to 12 additional on-site ADUs in order to meet the County's affordable housing requirements, resulting in a total of 131 units. Similarly, both the Buildout Pursuant to Existing Zoning Alternative and the Reduced Intensity Alternative analyzed herein could potentially require construction of additional on-site affordable housing if the County's affordable housing requirements and policies change. However, the total number of lots would remain unchanged, as would the overall disturbance area associated with the project. Given that the exact affordable housing requirements for the proposed



project and the project alternatives cannot be determined at this time, inclusion of additional affordable housing units on-site is not evaluated within this alternatives analysis.

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 site would remain in its current condition and would not be developed. As described in this EIR, the project site consists primarily of ruderal grasses and is absent of structures. The No Project (No Build) Alternative would not meet any of the project objectives and would not meet the overall intent of the DCWPCP’s land use designation for this site.

Aesthetics

The EIR determined that the proposed project could have a significant impact to nearby sensitive receptors as a result of the introduction of new sources of light and glare. The No Project (No Build) Alternative would consist of the continuation of the existing conditions of the project site. Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the site, creation of new sources of light or glare would not occur. Thus, impacts related to aesthetics would not occur under the No Project (No Build) Alternative.

Air Quality and Greenhouse Gas Emissions

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. In addition, the Alternative would not result in the generation of ROG in excess of the PCAPCD’s operational significance threshold of 55 pounds per day. The Alternative would not include installation of a sewer lift station on the project site and, thus, associated odor impacts could not occur. Thus, the impacts identified for the proposed project related to air quality would not occur under the No Project (No Build) Alternative, and Mitigation Measures 5-1(a), 5-1(b), 5-2, and 5-3 would not be required. Overall, no impacts related to Air Quality and GHG emissions would occur under the No Project (No Build) Alternative.



Biological Resources

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. As such, the Alternative would not have the potential to impact special-status plants, burrowing owl, Swainson's hawk, other special-status birds and birds protected under the MBTA, or special-status bats. The Alternative would not include removal of trees and, thus, would not conflict with the County's Tree Preservation Ordinance. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources. Mitigation Measures 6-1, 6-4, 6-5(a) and 6-5(b), 6-6, 6-7, 6-8(a) through 6-8(c), 6-10(a) and (b), and 6-11 would not be required. Overall, the impacts identified for the proposed project related to biological resources would not occur under the No Project (No Build) Alternative.

Cultural Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, the Alternative would not have the potential to result in impacts to cultural resources. Mitigation Measures 7-2, 7-4(a) through 7-4(c), and 7-5 would not be required.

Geology and Soils/Mineral Resources

Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, substantial soil erosion or loss of topsoil would not occur. In addition, the Alternative would not have the potential to destroy a unique paleontological resource or site or unique geologic feature. Thus, Mitigation Measures 8-2(a) through 8-2(d) and 8-4 would not be required. Because development would not occur, Mitigation Measure 8-3 requiring preparation of a final geotechnical engineering report would not be necessary. Overall, no impacts related to Geology and Soils/Mineral Resources would occur under the No Project (No Build) Alternative.

Hydrology and Water Quality

The No Project (No Build) Alternative would not include any ground disturbance or otherwise alter existing site conditions and, thus, would not have the potential to result in construction or operational impacts related to water quality, changes in drainage patterns, placement of housing or improvements in a flood hazard area, or increases in stormwater runoff rates. Thus, Mitigation Measures 10-1, 10-2(a) through 10-2(d), 10-4(a) through 10-4(e), and 10-5 would not be required. Overall, no impacts related to Hydrology and Water Quality would occur under the No Project (No Build) Alternative.

Noise

Given that the No Project (No Build) Alternative would not include any construction activities, associated temporary noise-level increases would not occur. Thus, Mitigation Measure 12-1 related to construction noise would not be required. Overall, no impacts related to Noise would occur under the No Project (No Build) Alternative.

Transportation and Circulation

The No Project (No Build) Alternative would not generate construction traffic or operational vehicle 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 Alternative would not result in significant impacts to study intersections or roadway segments. Therefore, Mitigation Measures 14-2, 14-7(a), and 14-7(b) would not be required. Overall, impacts related to transportation and circulation would not occur under the No Project (No Build) Alternative.



Buildout Pursuant to Existing Zoning Alternative

The Buildout Pursuant to Existing Zoning Alternative would consist of buildout of the project site per the current Placer County zoning designations at the maximum allowable density (see Figure 18-2). The current zoning designations for the site include: Residential Single-Family, combining Agriculture, minimum Building Site of 20,000 square feet (RS-AG-B-20) (eastern 24.1 acres); Open Space (O) (central-western 6.1 acres); and 1.8 acres of Farm-Development Reserve (F-DR) (western portion of site).

Under the Buildout Pursuant to Existing Zoning Alternative, 8.60 acres of the project site would be retained as open space, an increase of 2.26 acres compared to the proposed project. A total of 23.44 acres would be developed with residential lots, streets, a sewer lift station, an emergency vehicle access (EVA), and landscaping improvements. In total, the Alternative would allow for development of 30 single-family homes.

Off-site improvements required under the Buildout Pursuant to Existing Zoning Alternative, including widening portions of Brady Lane and Vineyard Road and sewer system improvements, would be identical to the proposed project.

Because the Buildout Pursuant to Existing Zoning Alternative would include development of the project site with residential uses, consistent with the County's General Plan and DCWPCP, Objective #1 would be met. Most of the remaining project objectives would be fully or partially met, as the Alternative would provide for a range of single-family residential lot sizes and would minimize encroachment into the 100-year flood plain and the sensitive environmental habitat associated with the Dry Creek tributary on the western portion of the site. However, because average lot sizes would be substantially increased relative to the proposed project, the Buildout Pursuant to Existing Zoning Alternative would result in a less efficient use of land and would require a greater amount of energy and water resources per capita.

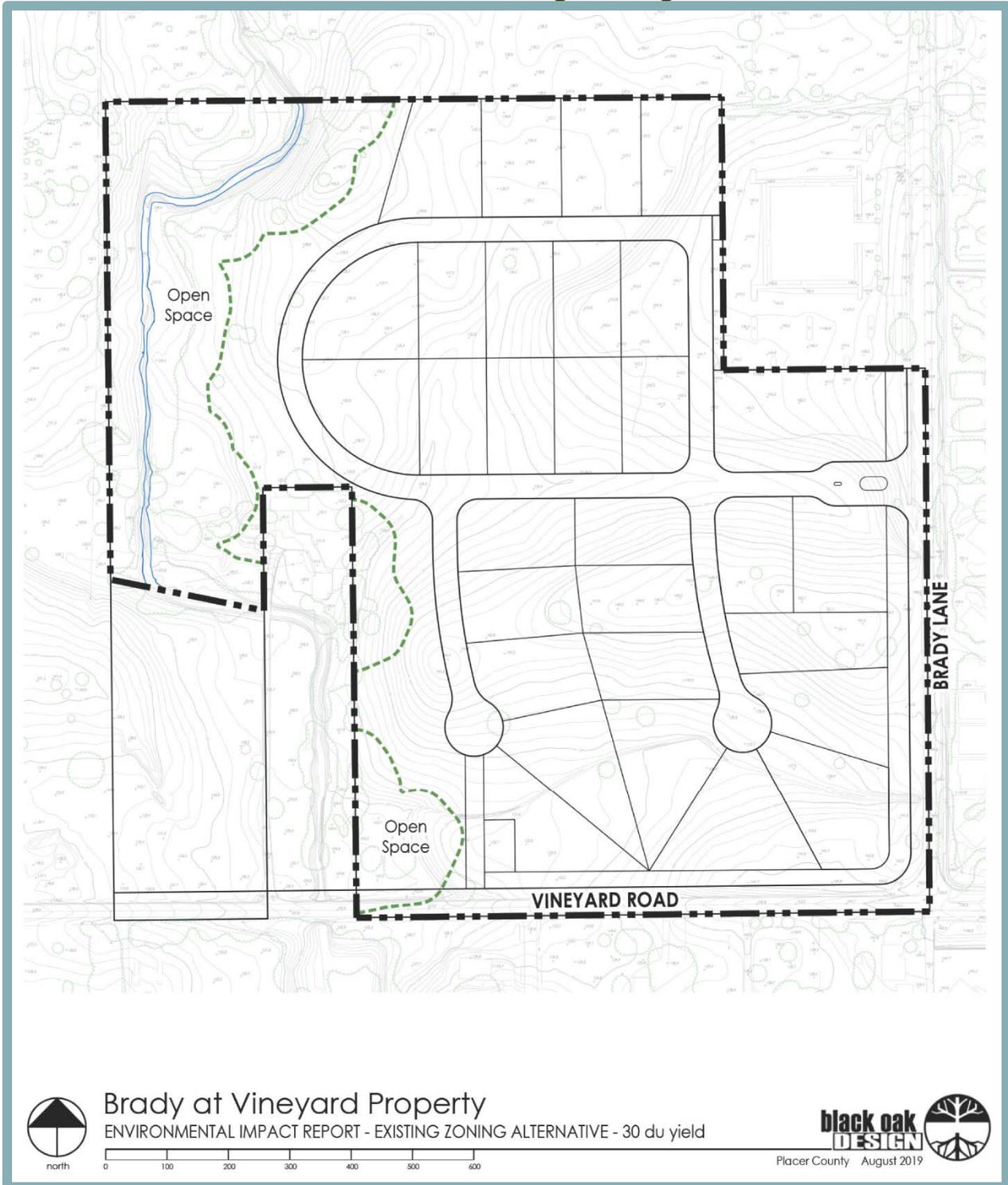
Aesthetics

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative would introduce new sources of light and glare to the project site where none currently exist, including along the project site frontages at Vineyard Road and Brady Lane. Such sources would include, but would not be limited to, streetlights within internal street systems, vehicle headlights, exterior lighting fixtures, interior light spilling through windows, and light reflected off of windows.

All on-site lighting would be required to comply with Section 17.54.070(i) of the Placer County Code. In addition, the Buildout Pursuant to Existing Zoning Alternative would be subject to compliance with the applicable sections of the *Placer County Design Guidelines* related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass onto residential property lines. However, because the types of lighting and the specific locations have not yet been determined for the Buildout Pursuant to Existing Zoning Alternative, Mitigation Measure 4-2 would still be required. Considering that the Buildout Pursuant to Existing Zoning Alternative would involve development of fewer units on-site, the project site would be anticipated to produce slightly less light and glare as compared to the proposed project. Although slightly less light and glare would be produced within the project site, because Mitigation Measure 4-2 would continue to be required, overall impacts related to aesthetics would be similar under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project.



Figure 18-2
Buildout Pursuant to Existing Zoning Alternative



Air Quality and Greenhouse Gas Emissions

Under the Buildout Pursuant to Existing Zoning Alternative, a total of 23.44 acres of the project site would be developed with residential uses and associated improvements, not including park areas. Given that the proposed project would develop approximately 25.70 acres of the site with residential uses, the disturbance area associated with the Alternative would represent a decrease of approximately 2.26 acres compared to the proposed project. As such, construction emissions of criteria pollutants would be slightly decreased compared to the proposed project. However, construction emissions of NO_x would still exceed PCAPCD’s 82.0 pounds per day (lbs/day) threshold. Thus, Mitigation Measures 5-1(a) and 5-1(b) would still be required. It should be noted that the park areas associated with both the proposed project and the Alternative would be subject to minor grading, but would not be developed with habitable structures.

With regard to operational emissions, CalEEMod, version 2016.3.2, software was used to estimate the Buildout Pursuant to Existing Zoning Alternative’s criteria air pollutant emissions. As shown in Table 18-1, the unmitigated operational emissions of criteria air pollutants associated with the Buildout Pursuant to Existing Zoning Alternative would be slightly less than the proposed project for ROG, NO_x, and PM₁₀. In particular, emissions of ROG related to operations of the Buildout Pursuant to Existing Zoning Alternative would be below the PCACPD’s threshold of significance. Consequently, Mitigation Measure 5-2 would not be required for the alternative. Although Mitigation Measure 5-2 would not be required and operational emissions of ROG under the Alternative would be less-than-significant, it should be noted that with implementation of Mitigation Measure 5-2, the operational emissions of the proposed project would be reduced to approximately 7.67 lbs/day. Emissions of 7.67 lbs/day would be far less than the estimated ROG emissions resulting from unmitigated operations of the Buildout Pursuant to Existing Zoning Alternative, despite the inclusion of 88 more units in the project.

Table 18-1			
Maximum Unmitigated Operational Emissions (lbs/day)			
Pollutant	Proposed Project	Buildout Pursuant to Existing Zoning Alternative	PCAPCD Significance Threshold
ROG	189.58	47.80	55
NO _x	14.24	3.60	55
PM ₁₀	36.86	9.29	82

Source: CalEEMod, July 2019.

Overall, because the Buildout Pursuant to Existing Zoning Alternative would result in ROG emissions below the PCAPCD’s threshold of significance without the need for mitigation, impacts related to Air Quality would be fewer under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project.

Biological Resources

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status plants, burrowing owl, Swainson’s hawk, other special-status birds and birds protected under the MBTA, or special-status bats. The Alternative would include removal of a similar number of trees as the proposed project and, thus, would have the potential to conflict with the County’s Tree Preservation Ordinance. Thus, Mitigation Measures 6-1, 6-4, 6-5(a) and 6-5(b), 6-6, 6-7, 6-10(a) and (b), and 6-11 would still be required. In addition, the Alternative would have



the potential to directly impact seasonal wetlands, a seasonal wetland swale, and a non-jurisdictional wetland ditch within the project site. The locations of such features are shown in Figure 6-8 of this EIR. Therefore, Mitigation Measure 6-8(a) through 6-8(c) would still be required. The overall riparian impact area would be similar to the proposed project. However, the 3.40 acres of Valley oak riparian woodland located within the western portion of the site would be entirely avoided under the Alternative. In addition, the Buildout Pursuant to Existing Zoning Alternative would preserve a larger portion of the site as open space compared to the proposed project (an increase of approximately 2.26 acres). Overall impacts to biological resources would be fewer under the Alternative compared to the proposed project.

Cultural Resources

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative would result in off-site disturbance as a result of roadway and sewer improvements necessary to accommodate new development. However, as noted above, the Buildout Pursuant to Existing Zoning Alternative would result in a slightly reduced overall disturbance area within the project site relative to the proposed project. Consequently, while Mitigation Measures 7-2, 7-4(a) through 7-4(c), and 7-5 would still be required, the potential for the Buildout Pursuant to Existing Zoning Alternative to result in disturbance or destruction of archaeological resources, human remains, and Tribal Cultural Resources would be decreased. Overall, potential impacts related to cultural resources would be fewer under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project.

Geology and Soils/Mineral Resources

As noted above, the Buildout Pursuant to Existing Zoning Alternative would include a smaller overall area of disturbance compared to the proposed project. Consequently, the potential for grading and other ground-disturbing activities to result in substantial soil erosion or loss of topsoil would be reduced. Similarly, the Alternative would have a reduced potential to encounter and destroy a unique paleontological resource or site or unique geologic feature. Nonetheless, Mitigation Measures 8-2(a) through 8-2(d) and 8-4 would still be required. In addition, Mitigation Measure 8-3 requiring preparation of a final geotechnical engineering report to ensure adequate structural support of the proposed improvements would still be required. Overall, impacts related to Geology and Soils/Mineral Resources would be fewer under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project.

Hydrology and Water Quality

Given that the Buildout Pursuant to Existing Zoning Alternative would include a slightly smaller overall area of disturbance compared to the proposed project, the potential for the Alternative to result in construction or operational impacts related to water quality would be reduced. In addition, because a smaller portion of the site would be developed with impervious surfaces, the potential for changes in drainage patterns and increases in stormwater runoff rates would be reduced compared to the proposed project. Nonetheless, the alternative would include placement of improvements within a flood hazard zone, and Mitigation Measures 10-1, 10-2(a) through 10-2(d), 10-4(a) through 10-4(e), and 10-5 would still be required. Overall, impacts related to Hydrology and Water Quality under the Buildout Pursuant to Existing Zoning Alternative could be fewer compared to the proposed project.

Noise

The Buildout Pursuant to Existing Zoning Alternative would include site preparation, grading, paving, and building construction activities and, thus, would generate short-term construction



noise. Thus, Mitigation Measure 12-1 would still be required. However, the Alternative would involve development of a smaller number of single-family residences relative to the proposed project, and would include a slightly smaller overall disturbance area. As such, impacts related to the creation of a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project would be fewer. Overall, noise impacts would be fewer under the Buildout Pursuant to Existing Zoning Alternative compared to the proposed project.

Transportation and Circulation

Similar to the proposed project, the Buildout Pursuant to Existing Zoning Alternative would add construction vehicle traffic to area roadways, thereby potentially conflicting with existing traffic patterns. As such, Mitigation Measure 14-1 related to preparation of a CTMP would still be required. However, because the Alternative would involve construction of 30 residential units, as compared to 119 units under the proposed project, the overall intensity of construction traffic, and associated impacts, would be reduced.

Based on vehicle trip generation rates provided in the Traffic Impact Analysis prepared for the proposed project by KD Anderson & Associates, Inc. (see Appendix K),² the Buildout Pursuant to Existing Zoning Alternative would result in approximately 283 average daily trips (ADT) during operations, as compared to 1,123 ADT occurring with development of the proposed project (see Table 18-2 and Table 18-3).

Table 18-2								
Buildout Pursuant to Existing Zoning Alternative Trip Generation								
Land Use	Unit/ Quantity	Trip Generation						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Single Family Residential	Dwelling unit	9.44	25%	75%	0.74	63%	37%	0.99
Alternative	30 units	283	6	17	22	19	11	30

Source: KD Anderson & Associates, Inc., 2019.

Table 18-3		
Proposed Project vs. Buildout Pursuant to Existing Zoning Alternative Average Weekday Trip Generation		
Duration	Proposed Project	Buildout Pursuant to Existing Zoning Alternative
Daily	1,123	283
AM Peak Hour	88	26
PM Peak Hour	118	35

Source: KD Anderson & Associates, Inc., 2019.

Because fewer vehicle trips would be generated by the Buildout Pursuant to Existing Zoning Alternative, the intensity of traffic-related impacts, including impacts to study intersections, would be reduced compared to the proposed project. However, the Alternative would add traffic to study intersections for which improvements have not been identified in the County’s Capital Improvement Program (CIP), or which are located outside of the County’s jurisdiction. In order to

² KD Anderson & Associates, Inc. *Traffic Impact Analysis for Brady Vineyard Subdivision, Placer County, California.* August 5, 2019.



determine whether the additional traffic occurring as a result of the Alternative would exceed the applicable significance thresholds for impacted intersections, a detailed traffic impact study would be required. While a conclusive determination cannot be reached without a quantitative analysis, the impacts to study intersections under Existing Plus Project and Cumulative Plus Project conditions would be anticipated to remain significant and unavoidable. Mitigation Measures 14-2, 14-7(a), and 14-7(b) would likely still be required.

Overall, development of the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts related to Transportation and Circulation compared to the proposed project.

Reduced Density Alternative

Under the Reduced Density Alternative, 10.88 acres of the project site would be retained as open space, an increase of 4.54 acres compared to the proposed project (see Figure 18-3). A total of 21.16 acres would be developed with residential lots, streets, a sewer lift station, an emergency vehicle access (EVA), and landscaping improvements. In total, the Alternative would allow for development of 83 single-family homes. At a density of 2.37 units/acre, the Alternative would involve a slightly reduced lot density compared to the 3.4 units/acre included in the proposed project. Off-site improvements required under the Reduced Density Alternative, including widening portions of Brady Lane and Vineyard Road and sewer system improvements, would be identical to the proposed project.

Because the Reduced Density Alternative would include development of the project site with residential uses, consistent with the type of development anticipated in the County's General Plan and the DCWPCP, Objective #1 would be met. Most of the remaining project objectives would be fully or partially met, as the Alternative would provide for a range of single-family residential lot sizes and would minimize encroachment into the 100-year flood plain and the sensitive environmental habitat associated with the Dry Creek tributary on the western portion of the site.

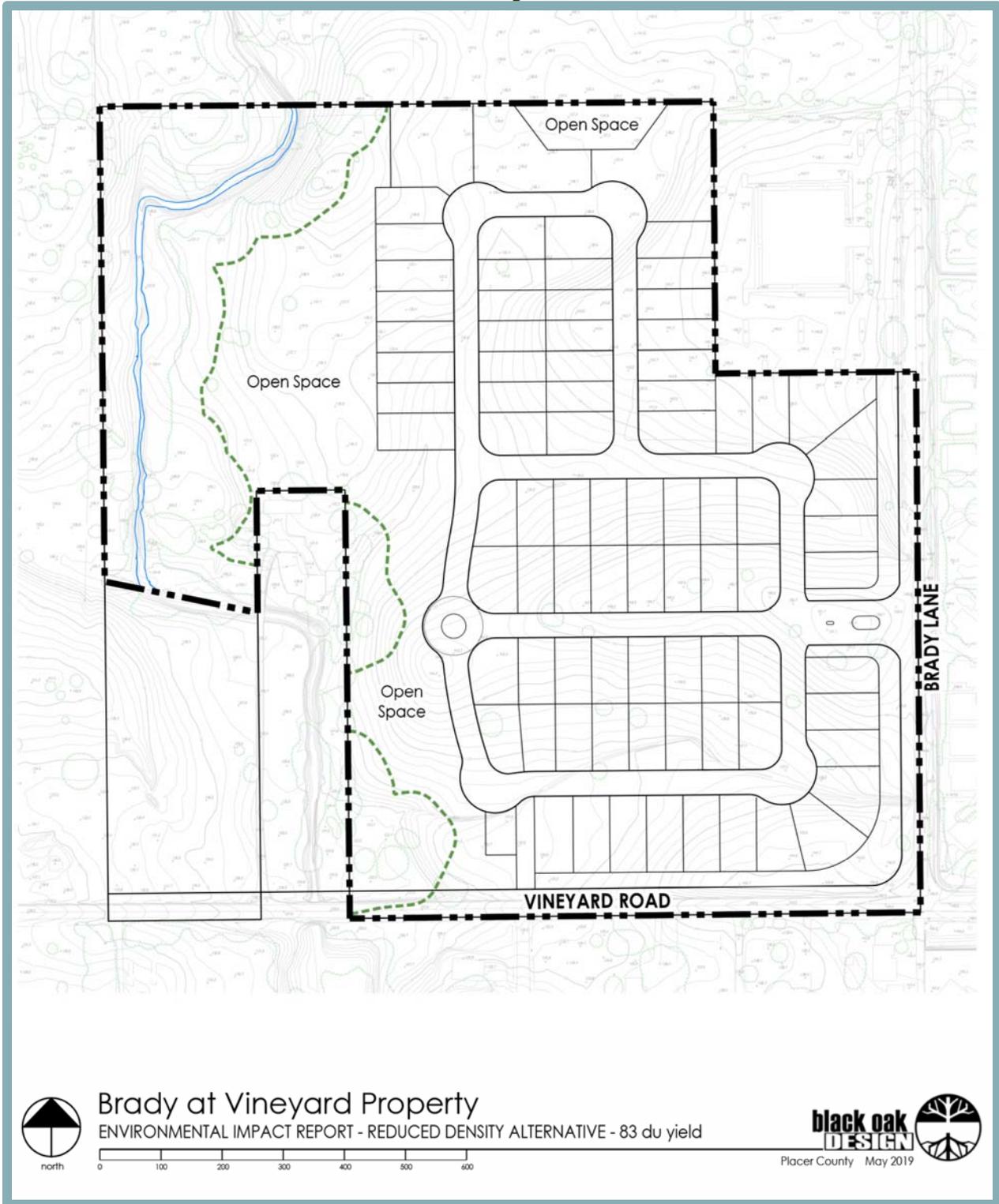
Aesthetics

Similar to the proposed project, the Reduced Density Alternative would introduce new sources of light and glare to the project site where none currently exist, including along the project site frontages at Vineyard Road and Brady Lane. Such sources would include, but would not be limited to, streetlights within internal street systems, vehicle headlights, exterior lighting fixtures, interior light spilling through windows, and light reflected off of windows.

All on-site lighting would be required to comply with Section 17.54.070(i) of the Placer County Code. In addition, the Reduced Density Alternative would be subject to compliance with the applicable sections of the *Placer County Design Guidelines* related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass onto residential property lines. However, because the types of lighting and the specific locations have not yet been determined for the Reduced Density Alternative, Mitigation Measure 4-2 would still be required. Overall, impacts related to aesthetics would be similar under the Reduced Density Alternative compared to the proposed project.



**Figure 18-3
Reduced Density Alternative**



Air Quality and Greenhouse Gas Emissions

Under the Buildout Pursuant to Existing Zoning Alternative, a total of 21.16 acres of the project site would be developed with residential uses and associated improvements. Given that the proposed project would develop approximately 25.70 acres of the site with residential uses and associated improvements, the disturbance area associated with the Alternative would represent a decrease of approximately 4.54 acres compared to the proposed project. As such, construction emissions of criteria pollutants would be slightly decreased compared to the proposed project. Although construction emissions would be slightly decreased, construction of the Alternative would be anticipated to result in significant emissions, and mitigation would continue to be required. It should be noted that the park areas associated with both the proposed project and the Alternative would be subject to minor grading, but would not be developed with habitable structures.

With regard to operational emissions, CalEEMod was used to estimate the Reduced Density Alternative’s criteria air pollutant emissions. As shown in Table 18-4, the unmitigated operational emissions of criteria air pollutants associated with the Reduced Density Alternative would be slightly less than the proposed project for ROG, NO_x, and PM₁₀. However, similar to the proposed project, operational ROG emissions under the Alternative would exceed the PCAPCD’s 55 lbs/day threshold of significance. Thus, Mitigation Measure 5-2 would still be required.

Table 18-4 Maximum Unmitigated Operational Emissions (lbs/day)			
Pollutant	Proposed Project	Reduced Density Alternative	PCAPCD Significance Threshold
ROG	189.58	132.23	55
NO _x	14.24	9.74	55
PM ₁₀	36.86	25.71	82

Source: CalEEMod, July 2019.

Overall, impacts related to Air Quality would be fewer under the Reduced Density Alternative compared to the proposed project.

Biological Resources

Similar to the proposed project, the Reduced Density Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status plants, burrowing owl, Swainson’s hawk, other special-status birds and birds protected under the MBTA, or special-status bats. The Alternative would include removal of a similar number of trees as the proposed project and, thus, would have the potential to conflict with the County’s Tree Preservation Ordinance. Thus, Mitigation Measures 6-1, 6-4, 6-5(a) and 6-5(b), 6-6, 6-7, 6-10(a) and (b), and 6-11 would still be required. In addition, the Alternative would have the potential to directly impact a seasonal wetland swale and a non-jurisdictional wetland ditch. The locations of such features are shown in Figure 6-8 of this EIR. Therefore, Mitigation Measures 6-8(a) through 6-8(c) would still be required. However, the seasonal wetlands located along the northern site boundary would be avoided as part of the Reduced Density Alternative. Thus, the overall wetland impact area for the Alternative would be reduced compared to the proposed project. The 3.40 acres of Valley oak riparian woodland, located within the western portion of the site, would be entirely avoided under the Reduced Density Alternative and the Alternative would preserve a



larger portion of the site as open space compared to the proposed project (an increase of approximately 4.54 acres).

Overall impacts to biological resources would be fewer under the Alternative compared to the proposed project.

Cultural Resources

Similar to the proposed project, the Reduced Density Alternative would result in off-site disturbance as a result of roadway and sewer improvements necessary to accommodate new development. However, as noted above, the Reduced Density Alternative would result in a slightly reduced overall disturbance area within the project site relative to the proposed project. Consequently, while Mitigation Measures 7-2, 7-4(a) through 7-4(c), and 7-5 would still be required, the potential for the Reduced Density Alternative to result in disturbance or destruction of archaeological resources, human remains, and Tribal Cultural Resources would be decreased. Overall, potential impacts related to cultural resources could be fewer under the Reduced Density Alternative compared to the proposed project.

Geology and Soils/Mineral Resources

As noted above, the Reduced Density Alternative would include a smaller overall area of disturbance compared to the proposed project. Consequently, the potential for grading and other ground-disturbing activities to result in substantial soil erosion or loss of topsoil would be reduced. For similar reasons, the Alternative would have a reduced potential to destroy a unique paleontological resource or site or unique geologic feature. Nonetheless, Mitigation Measures 8-2(a) through 8-2(d) and 8-4 would still be required. In addition, Mitigation Measure 8-3 requiring preparation of a final geotechnical engineering report to ensure adequate structural support of the proposed improvements would still be required. Overall, impacts related to Geology and Soils/Mineral Resources could be fewer under the Reduced Density Alternative compared to the proposed project.

Hydrology and Water Quality

Given that the Reduced Density Alternative would include a slightly smaller overall area of disturbance compared to the proposed project, the potential for the Alternative to result in construction or operational impacts related to water quality would be reduced. In addition, because a smaller portion of the site would be developed with impervious surfaces, the potential for changes in drainage patterns and increases in stormwater runoff rates would be reduced compared to the proposed project. However, the alternative would include placement of improvements within a flood hazard zone, and Mitigation Measures 10-1, 10-2(a) through 10-2(d), 10-4(a) through 10-4(e), and 10-5 would still be required. Overall, impacts related to Hydrology and Water Quality under the Reduced Density Alternative would be fewer compared to the proposed project.

Noise

The Reduced Density Alternative would include site preparation, grading, paving, and building construction activities and, thus, would generate short-term construction noise. However, the Alternative would involve development of a smaller number of single-family residences relative to the proposed project and would include a slightly smaller overall disturbance area. As such, impacts related to the creation of a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project would be fewer. Overall, noise impacts would be fewer under the Reduced Density Alternative compared to the proposed project.



Transportation and Circulation

Similar to the proposed project, the Reduced Density Alternative would add construction vehicle traffic to area roadways, thereby potentially conflicting with existing traffic patterns. As such, Mitigation Measure 14-1 related to preparation of a CTMP would still be required. However, because the Alternative would involve construction of 83 residential units, as compared to 119 units under the proposed project, the overall intensity of construction traffic associated impacts would be reduced.

Based on vehicle trip generation rates provided in the Traffic Impact Analysis prepared for the proposed project by KD Anderson & Associates, Inc. (see Appendix K),³ the Reduced Density Alternative would result in approximately 784 ADT during operations, as compared to 1,123 ADT occurring with development of the proposed project (see Table 18-5 and Table 18-6).

Table 18-5 Reduced Density Alternative Trip Generation								
Land Use	Unit/ Quantity	Trip Generation						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Single Family Residential	Dwelling unit	9.44	25%	75%	0.74	63%	37%	0.99
Alternative	83 units	784	15	46	61	52	30	82

Source: KD Anderson & Associates, Inc., 2019.

Table 18-6 Proposed Project vs. Reduced Density Alternative Average Weekday Trip Generation		
Duration	Proposed Project	Reduced Density Alternative
Daily	1,123	784
AM Peak Hour	88	61
PM Peak Hour	118	82

Source: KD Anderson & Associates, Inc., 2019.

Because fewer vehicle trips would be generated by the Reduced Density Alternative, the intensity of traffic-related impacts, including impacts to study intersections, would be reduced compared to the proposed project. However, the Alternative would add traffic to study intersections for which improvements have not been identified in the County’s Capital Improvement Program, or which are located outside of the County’s jurisdiction. In order to determine whether the additional traffic occurring as a result of the Alternative would exceed the applicable significance thresholds for impacted intersections, a detailed traffic impact study would be required. While a conclusive determination cannot be reached without a quantitative analysis, the impacts to study intersections under Existing Plus Project and Cumulative Plus Project conditions would still be anticipated to remain significant and unavoidable. Mitigation Measures 14-2, 14-7(a), and 14-7(b) would likely still be required.

Overall, development of the Reduced Density Alternative would result in fewer impacts related to Transportation and Circulation compared to the proposed project.

³ KD Anderson & Associates, Inc. *Traffic Impact Analysis for Brady Vineyard Subdivision, Placer County, California.* August 5, 2019.



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. The environmentally superior alternative is generally the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the County. 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.” In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, many of the impacts resulting from the proposed project would not occur under the Alternative, as shown in Table 18-7 below.

Table 18-8 below provides a summary of how each of the alternatives considered in this chapter would or would not meet the project objectives. As noted in the table, the No Project (No Build) Alternative would not meet any of the project objectives and would not be consistent with the intent of the DCWPCP and would not meet the overall intent of the RS zoning designation. The Buildout Pursuant to Existing Zoning Alternative would fully meet seven of the project objectives and partially meet three of the objectives. The Reduced Density Alternative would fully meet eight of the project objectives and partially meet two of the objectives.

As discussed throughout this chapter and shown in Table 18-7, both the Buildout Pursuant to Existing Zoning Alternative and the Reduced Density Alternative would result in fewer impacts than the proposed project related to seven of the eight issue areas for which project impacts were identified. However, the Buildout Pursuant to Existing Zoning Alternative would result in substantially fewer vehicle trips during operations. In addition, as shown in Table 18-1, operational ROG emissions would be substantially reduced.

Thus, impacts related to Air Quality and Greenhouse Gas Emissions and Transportation and Circulation would be fewer under the Buildout Pursuant to Existing Zoning Alternative compared to the Reduced Density Alternative. It should be noted that despite the above, the Reduced Density Alternative would include a smaller overall disturbance area and a greater number of residential units; thus, the Reduced Density Alternative would be more economically feasible than the Buildout Pursuant to Existing Zoning Alternative.

The development of the Buildout Pursuant to Existing Zoning Alternative would partially satisfy the project objectives and would result in similar or reduced impacts compared to the proposed project in eight resource areas. Because fewer vehicle trips would be generated by the Buildout Pursuant to Existing Zoning Alternative, the intensity of traffic-related impacts, including impacts to study intersections, would be reduced compared to the proposed project. However, the Alternative would add traffic to study intersections for which improvements have not been identified in the County’s Capital Improvement Program (CIP), or which are located outside of the County’s jurisdiction. In order to determine whether the additional traffic occurring as a result of the Alternative would exceed the applicable significance thresholds for impacted intersections, a detailed traffic impact study would be required. While a conclusive determination cannot be reached without a quantitative analysis, the impacts to study intersections under Existing Plus Project and Cumulative Plus Project conditions would be anticipated to remain significant and unavoidable.



While the Buildout Pursuant to Existing Zoning Alternative would predominantly result in fewer impacts than the Reduced Density Alternative, 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 would be considered the environmentally superior alternative to the proposed project.



**Table 18-7
 Comparison of Environmental Impacts for 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	Similar	Similar
Air Quality and Greenhouse Gas Emissions	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Biological Resources	Less-Than-Significant with Mitigation	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
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Noise	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Transportation and Circulation	Less-Than-Significant with Mitigation <u>and</u> Significant and Unavoidable (cumulative)	None	Fewer*	Fewer*
Total Fewer:		8	7	7
Total Similar:		0	1	1
Note: No Impact = "None;" Less than Proposed Project = "Fewer;" and Similar to Proposed Project = "Similar"				
* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.				



**Table 18-8
 Project Objective Alternatives Analysis**

Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
1. Implement the County's General Plan and DCWPCP, which designate the proposed project area for residential development.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. The Alternative would consist of buildout of the project site per the current zoning designations at the maximum allowable density.	Meets. The Alternative would develop the project site with single-family residential uses.
2. Provide a well-designed residential community with neighborhood identity in close proximity to jobs and services in Placer and Sacramento Counties.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. The Alternatives would provide for single-family residential uses with convenient access to jobs and services within the surrounding region.	
3. Provide for medium residential densities in areas presently planned for urban growth and development with accessible infrastructure, consistent with current area-wide infrastructure plans and growth policies.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. The Alternative would provide for residential development and recreational land uses in the form of private parks; however, the Alternative would include low density residential uses, rather than medium density. Due to the reduced number of residential units, adequate funding may not be available to fund necessary infrastructure improvements.	Meets. Similar to the proposed project, the Alternative would provide for medium density residential development and recreational land uses in the form of private parks. In addition, utility infrastructure would be available to serve the Alternative.
4. Add to the diversity of housing choices that can support a wider range of lifestyles in the DCWPCP Area.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. The Alternative would include construction of residential housing; however, due to the reduced number of lots and the substantial increase in lot size relative to the proposed project, the Alternative would limit housing choices.	Meets. The Alternative would provide for medium-density residential development with a variety of different lot sizes.

(Continued on next page)



**Table 18-8
 Project Objective Alternatives Analysis**

Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
5. Reduce growth pressures on outlying areas of Placer County by efficiently utilizing the project site to accommodate residential growth and development.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. The Alternatives would provide for single-family residential development adjacent to existing residential development within the City of Roseville.	
6. Create a high-quality neighborhood environment containing a mix of residential, open-space, and recreational land uses.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. The Alternatives would both preserve the existing on-site riparian corridor as open space, while allowing for development of residential uses and parks on the remainder of the site.	
7. Provide for variable lot sizes and increased lot coverage to promote the efficient use of land, energy and water resources within a residential community.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. Because average lot sizes would be substantially increased relative to the proposed project, both Alternatives would result in a less efficient use of land and would require a greater amount of energy and water resources per capita.	
8. Design a project that minimizes encroachment into the existing 100-year floodplain on the site while balancing the housing needs and densities and the character of the local community.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. Both Alternatives would retain the western portion of the project site as open space, thereby limiting encroachment into the 100-year floodplain associated with the Dry Creek tributary. However, the reduced development density means the Alternatives would do less to meet housing needs within the DCWPCP area and the surrounding region.	
9. Provide a comprehensively planned project that protects sensitive environmental habitat and resources, including existing riparian and oak woodland habitat on the project site, within a permanent greenbelt area.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. Both Alternatives would preserve the riparian habitat associated with the existing on-site drainage as open space.	
10. Provide a planned infrastructure system with all public facilities and services necessary to meet the needs of development of the project site.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. Both Alternatives are anticipated to include concomitant development of necessary public facilities and services to meet the needs of the alternative.	

(Continued on next page)



**Table 18-8
 Project Objective Alternatives Analysis**

Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Zoning Alternative	Reduced Density Alternative
11. Provide a sufficient number of residential units within the project site to support necessary improvements to local and regional public service facilities.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Does not meet. Both Alternatives would include fewer residential units compared to the proposed project. Thus, funding for public services and facilities generated by development impact fees would be reduced.	

