

17.0 ALTERNATIVES

17.1 PURPOSE

Section 15126.6(a) of the State CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to a project or its location that would feasibly attain most of the project's basic objectives but would avoid or substantially lessen any of the significant effects, and that the EIR evaluate the comparative merits of the alternatives. An EIR need not describe or evaluate the environmental effects of alternatives at the same level of detail as the effects of the proposed project; however, the document must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

CEQA requires that a no project alternative be evaluated (State CEQA Guidelines, Section 15126.6[e]). In addition, the EIR must identify an environmentally superior alternative among the alternatives considered, defined as the alternative that would result in the least adverse environmental impacts on a project site and affected environment. If the no project alternative is found to be environmentally superior, the EIR must also identify an environmentally superior alternative among the other alternatives.

The State CEQA Guidelines recommend that an EIR briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that the lead agency considered but rejected as infeasible, and briefly explain the reasons for the lead agency's determination (State CEQA Guidelines, Section 15126.6[c]).

17.2 FACTORS CONSIDERED IN SELECTION OF ALTERNATIVES

Consistent with Section 15126.6(c) of the State CEQA Guidelines, Placer County considered the following factors in developing the range of reasonable alternatives to the proposed project:

- ▶ The extent to which the alternative would accomplish the project's objectives
- ▶ The feasibility of the alternative
- ▶ Avoidance or substantial reduction of significant effects

Alternatives that would have the same or greater impacts than the proposed project, or that would not meet most of the project objectives, were rejected from further consideration (State CEQA Guidelines, Section 15126.6[a]). However, the project objectives may not be defined so narrowly that the range of alternatives is unduly constrained.

17.2.1 ABILITY OF THE ALTERNATIVE TO ATTAIN MOST PROJECT OBJECTIVES

The following project objectives were considered when developing alternatives evaluated in this SEIR. The following objectives were identified by the County for the HFRP Trail Expansion Project:

- ▶ Support County goals for trails as outlined in the 2013 General Plan Update Recreational Trails Element Goal 5.C for developing a system of interconnected hiking, riding, and bicycling trails and paths suitable for active recreation and transportation and circulation.
- ▶ Implement the recreational resource objectives of the Placer Legacy Open Space and Agricultural Conservation Program (available at <https://www.placer.ca.gov/3420/Placer-Legacy>), beginning on page 3-17

that aim to “...enhance recreational opportunities in the County by improving public trail access, including the construction of staging areas and parking lots, as well as the purchase of public access easements on private land to provide connections to public land and city trail connections” and “provide regional recreational facilities in the foothill region, supplementing the recreation opportunities provided on public lands to the east and municipal park facilities in urbanized areas. South Placer residents would be served by one or more large regional parks (300 acres or greater) in a rural setting with a variety of passive recreation opportunities. Such a park may be connected with larger area of protected land, providing additional wildlife habitat value.”

- ▶ Provide expanded opportunities for public passive recreation and educational access without overburdening natural resources, local roadways or adjacent communities.
- ▶ Expand the existing multi-use, natural-surface trail system to provide recreational opportunities for the residents of Placer County and the region, while maintaining safety for park users, visitors, and nearby residents.
- ▶ Create new areas for public parking that function smoothly from the outset.
- ▶ Create connectivity between the existing trails in HFRP and the expanded trail network.
- ▶ Expand on opportunities for natural, cultural, agricultural and historic resource education, fostering stewardship and environmental awareness.

17.2.2 FEASIBILITY OF THE ALTERNATIVES

An EIR need not consider every conceivable alternative to a project. Rather, a range of potentially feasible alternatives, governed by the “rule of reason,” must be considered. This is intended to foster informed decision making and public participation (State CEQA Guidelines, Section 15126.6[f]). CEQA generally defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account environmental, social, technological, and legal factors.” Alternatives were evaluated according to the “rule of reason” and general feasibility criteria suggested by State CEQA Guidelines Section 15126.6 as follows:

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The 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 determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

The inclusion of an alternative in an EIR does not necessarily mean that the alternative is feasible; rather, it indicates that the lead agency’s staff has determined that the alternative is potentially feasible. When developing alternatives for consideration, feasibility is also a key component of the decision. The determination of feasibility was based on the following criteria (State CEQA Guidelines, Section 15126.6[f][1]):

- ▶ suitability of the site or alternative site;
- ▶ the alternative's economic viability;
- ▶ availability of infrastructure;
- ▶ consistency of the alternative with the *Placer County General Plan*, zoning, and other plans and regulatory limitations; and
- ▶ the effect of applicable jurisdictional boundaries.

17.2.3 AVOIDANCE OR SUBSTANTIAL REDUCTION OF SIGNIFICANT EFFECTS

The evaluation of alternatives must also consider the potential for the alternative to avoid or substantially lessen any of the significant effects of the project, as identified in this SEIR. The potential significant environmental effects of the proposed project include:

- ▶ Significant and unavoidable impact to the visual character of Garden Bar Road (Impact 7-3)
- ▶ Significant and unavoidable impact to transportation due to an increase in vehicle miles traveled (Impact 8-3)
- ▶ Significant and unavoidable impact to cumulative transportation due to an increase in vehicle miles traveled (Impact 18-1)

17.3 ALTERNATIVES REMOVED FROM CONSIDERATION

17.3.1 OFF SITE ALTERNATIVE – REASONS FOR DISMISSAL

CEQA Section 15126.6(f)(2) requires the lead agency to consider alternative locations to a project if using an off-site location would avoid or lessen any of the significant effects of the project. Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion in the SEIR.

Suitable locations for a project that provide passive recreational opportunities and encourage land conservation and enhancement of native habitat are rural by definition, characterized by open space containing natural habitat including oak woodlands that supports wildlife. It is likely that if the project were to be constructed at another rural area of Placer County, impacts on visual resources and traffic on rural roads that do not meet current design standards would result in a similar level of impact. Finally, inclusion of the offsite alternative for detailed evaluation would require speculation on the part of the lead agency because the effects cannot be reasonably ascertained and the ability of the County to implement such an action is remote.

In addition, the County owns or has easements in place that allow the construction and operation of the trail expansion and related improvements. Some of the land is owned and actively managed by Placer Land Trust. Land Management Plans have been prepared for each preserve that establish measures to preserve, restore, and maintain natural habitat in perpetuity. The management plans restrict use of the land to specific activities considered compatible with the purpose and contains an adaptive management plan for land managers to use as manual for implementation. The land management plans permit use of the preserves for outdoor recreational activity. There is no guarantee land elsewhere in the County is available for acquisition that is protected and managed for preservation of natural resources and suitable for passive public recreation.

17.4 ALTERNATIVES SELECTED FOR ANALYSIS

The County has selected 2 alternatives to the proposed project plus the no project alternative for comparison. An SEIR need not describe or evaluate the environmental effects of alternatives at the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (State CEQA Guidelines, Section 15126.2[d]). Section 15126.6(e) of the State CEQA Guidelines requires that, among other alternatives, a “no project” alternative be evaluated in comparison to the proposed project. It states that the purpose of the “no project” alternative is to “allow decision-makers to compare the impacts of approving the proposed project with the impact of not approving the proposed project.” It also states that the “no project” analysis shall “discuss the existing conditions..., as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved...” Accordingly, this section provides an analysis of the “no project” alternative.

The environmentally superior alternative is also identified, as required by the State CEQA Guidelines. Section 15126(e)(2) states that “[i]f the environmentally superior alternative is the ‘no project’ alternative, the SEIR shall also identify an environmentally superior alternative among the other alternatives.”

NO PROJECT ALTERNATIVE (ALTERNATIVE 1)

The No Project Alternative assumes that the proposed natural-surface trails and related recreational amenities would not be constructed and that the approximately 2,700 acres of land in the Trails Expansion boundary owned or managed by the Placer Land Trust (PLT) and/or the County would not be open to the public other than for the docent-led tours as currently conducted by the PLT. The surrounding area would continue to be grazed and access would be limited to PLT maintenance staff, invited guests, and emergency vehicles.

Because trail expansion and related parking facilities would not be constructed under this alternative, and general public access would not be allowed, the impacts associated with the proposed project on land use and agriculture, biological resources, cultural resources, transportation and circulation, air quality, noise, soils, geology, and seismicity, hydrology and water quality, public services and utilities, visual resources, hazardous materials and hazards, and wildfire would not occur. Because the proposed project would have little to no impact on population, employment, and housing; and mineral resources, impacts on these resources under the No Project Alternative would be similar to those under the proposed project.

Ability of No Project (Alternative 1) to Achieve Project Objectives

Alternative 1 would not meet any of the project objectives and does not offer beneficial effects on recreation compared to the proposed project. The no project alternative would not meet the goals of the Placer County General Plan or Placer Legacy Program, nor would it meet the intended use of the PLT and County-held properties and easements, namely, to utilize the properties for public recreational purposes including hiking, bicycling, and equestrian uses as well as for conservation of the natural resources.

REDUCED TRAILHEAD AMENITIES (ALTERNATIVE 2)

Alternative 2 would reduce the amount of parking and amenities proposed at the Garden Bar, Twilight Ride and Harvego Preserve parking areas. Alternative 2 assumes 30 miles of proposed natural-surface trails, 2 bridge crossings over Raccoon Creek, and stream crossings would be constructed over time as described under the

proposed project. Alternative 2 would also provide 25 additional vehicle parking spaces at the existing Mears Place park entry, 30 automobile parking spaces at the Garden Bar entrance (along with the improvements associated with Phase 1A, 1B, and 1C of the new Garden Bar parking area), 18 automobile parking spaces at the Harvego Preserve parking area (in addition to other Phase 1 and 2 improvements), and 54 automobile and 20 equestrian parking spaces, along with other corresponding improvements associated with Phase 1 of the Twilight Ride parking area. In total, Alternative 2 would reduce the total number of new automobile parking spaces to 127 and the equestrian parking spaces to 20, versus 297 automobile and 68 equestrian spaces proposed at full buildout. This Alternative would potentially reduce the significant and unavoidable impacts associated with VMT but not to a less than significant level. The significant unavoidable impact to visual resources created by the Garden Bar Road improvements would remain. Alternative 2 would not implement full buildout of the parking area, trailhead amenities and sanitation improvements planned for the entrances at Garden Bar Road, Harvego Preserve, and Twilight Ride. Instead, it would include the construction of only certain phases of each parking area, as described below:

- ▶ Garden Bar Road Park Entry – Alternative 2 would implement Phase 1A, Phase 1B, and Phase 1C improvements that provide a parking lot off a new access road north of the existing access road on Garden Bar Road. The newly constructed entrance road and parking area would provide adequate turning radius for emergency vehicles. Paved parking sized to accommodate 25 vehicles (plus 5 ADA stalls near the westerly major “Salmon Run” Bridge within the existing HFRP boundary) would be constructed and visitors would use an existing easement to reach the trail system within the existing HFRP boundary. Additional improvements would include a 12,000-gallon water tank with hydrant and portable toilets in Phase 1A, pull-outs along Garden Bar Road in Phase 1B, and installation of permanent restrooms and a public well in Phase 1C. It would not include full buildout of the parking area as originally approved with Phases 2 and 3 of the original EIR in 2010.
- ▶ Harvego Preserve Entry – Alternative 2 would implement Phase 1 and Phase 2 improvements that provide parking to accommodate 17 automobiles plus 1 ADA compliant space at the Harvego Preserve entry. Phase 1 improvements would include the paving of the ADA parking space and the provision for portable toilets. Phase 2 improvements would include pull-outs on Curtola Ranch Road and the hard surfacing of the road and parking area, but under the proposed phasing, would not include widening of Curtola Ranch Road (an easement amendment with the land owner would need to occur to allow pull-outs instead of widening to 20 feet with this phase). Phase 2 improvements would also include an entry gate and/or attendant booth, exclusionary fencing/bollards and gates along the easement as necessary, and other CAL FIRE improvements. Alternative 2 would not widen, nor would it introduce supporting recreational amenities or infrastructure (12,000-gallon water tank, permanent restroom, drinking fountain, helicopter landing zone and equestrian amenities). Access to the park from this location would be restricted to a maximum of 18 vehicles.
- ▶ Twilight Ride Entry – Alternative 2 would limit construction to that described within Phase 1: a hard-surfaced access road including a turnaround sufficient to accommodate a fire truck, entrance gate (either automated or with attendant and booth), and paved parking capable of accommodating 50 standard parking spaces, plus 4 ADA compliant parking spaces, and 20 gravel parking spaces for horse trailers. A restroom building supported by a groundwater well and septic system (or vault system) would be installed along with a water tank and helicopter landing zone to support emergency access. The new access road would require culverts/bridges for stream crossings and construction of some retaining walls to support the roadbed/parking areas. The purchase of an Emergency Medical Services light rescue vehicle (LRV) would also occur during

Phase 1, as would the construction of a new trail connection to the Taylor Ranch and provision of an informational kiosk. Because this alternative would not result in full buildout, the Bell Road left-hand turn lane construction would not be required.

Land Use and Agricultural Resources

Similar to the proposed project, Alternative 2 would be consistent with the *Placer County General Plan* (General Plan), the Placer County Zoning Ordinance, and the Placer Legacy goals. Under either development scenario, the division of an established community would not occur, nor would impacts to timber resources or operations take place. Grazing would be allowed to continue on the property under both the proposed project and Alternative 2, so impacts on agricultural uses are similar. Like the proposed project, Alternative 2 would not interfere with surrounding land uses, and would be compatible with the existing land management plan policies for restricted use. Because Alternative 2 would not conflict with any land use plans in the project area and grazing would be allowed to continue, the potential impacts of Alternative 2 on land use, planning, and agricultural resources would be similar to those of the proposed project.

Soils, Geology, and Seismicity

Construction of recreational facilities under Alternative 2 would require some ground disturbance and clearing and grubbing of vegetation resulting in minor alterations to surface topography similar to the project. This alternative would include construction of restrooms and small maintenance buildings, and construction of bridges and overlooks that would be subject to ground shaking, liquefaction, and landslides. However, the project area is not located within an earthquake fault zone, no active faults are known to occur on site and no structures for human occupancy would be placed across any fault traces. The County would obtain authorization for construction and operation activities from the Central Valley Regional Water Quality Control Board (RWQCB) and implement erosion and sediment control measures obtain to reduce potential impacts on geology, soils, and seismicity under either development scenario. However, because less grading would occur under Alternative 2, potential impacts of Alternative 2 on soils, geology and seismicity would be less than those identified for the proposed project.

Cultural and Tribal Cultural Resources

One prehistoric and two historic cultural resources (Rock Walls (HF-2016-1) and Water Conveyance Ditch and Stacked Rock Wall (HF-2017-1) are known to occur within the HFRP Trails Expansion area. Project related improvements such as the parking lot, access road and trailhead amenities would not disturb these resources. Further, neither of the historic cultural resources would be considered eligible for listing in the NRHP or CRHR. As with the proposed project, Alternative 2 would not result in an impact to any known prehistoric resource or eligible historic resources. As with the proposed project, Alternative 2 would have the potential to uncover previously unknown artifacts during ground disturbance. This SEIR includes mitigation measures to reduce impacts on known and yet-to-be-discovered cultural resources. With implementation of these mitigation measures, both the proposed project and Alternative 2 would avoid impacts on cultural resources. However, because of the reduction in area graded under Alternative 2, the potential for this alternative to uncover previously unknown artifacts is reduced, so potential impacts on cultural resources for Alternative 2 are less than those of the proposed project.

Visual Resources

Similar to the project, Alternative 2 would introduce new physical elements into the landscape; however, Alternative 2 would not alter the visual character of land visible from Garden Bar Road since the widening of Garden Bar Road (18 feet with 2-foot shoulders) would not occur and the tree removal necessary for the road widening would not take place. The changes to visual conditions under this alternative would be less substantial than those under the proposed project, and the Significant and Unavoidable Impact relating to the visual impacts on Garden Bar Road would be eliminated. Construction of structures such as the ranger booth and restrooms would incorporate natural materials and colors to compliment the rural character of the site. Alternative 2 would not affect scenic vistas, rock outcroppings, or other prominent features on the site. Because this alternative would not include the widening of Garden Bar Road and the associated tree removal, and requires less grading, it has a smaller disturbance footprint; therefore, this alternative would significantly reduce the impacts on aesthetics when compared to the proposed project.

Transportation and Circulation

Both the proposed project and Alternative 2 would create additional vehicle trips on local roads traveling to and from the expansion areas; however, Alternative 2 would reduce the amount of proposed parking by approximately 60%. A short-term increase in traffic on various County roadways, including Garden Bar Road, Bell Road, Curtola Ranch Road, Mears Drive, and Lone Star Road would occur as equipment and workers travel to and from active construction sites. Increased vehicle trips during construction of the project is temporary in duration and vehicle trips would travel along varying roadways depending on the site improvement under construction.

Alternative 2 would reduce the number of parking spaces to 127 spaces, plus 20 parking spaces sized to accommodate horse trailers. In comparison, the proposed project would provide 359 parking spaces, including 297 new automobile parking spaces and 68 spaces sized to accommodate horse trailers. Alternative 2 would apply the reservation system to the HFRP Trail Expansion area to control the daily trips traveling to and from the site on peak usage days. Alternative 2 would reduce the number of daily trips on local roads and reduce traffic at the intersection of SR-49 with Cramer Road. However, the impacts under both the existing-plus-project level and cumulative levels would remain significant and unavoidable since the County does not have an established threshold for VMT. While Alternative 2 would reduce some VMT, both Alternative 2 and the project itself would remain inconsistent with the MTP/SCS.

Safety related impacts of Alternative 2 would also be slightly less than those of the proposed project. Under either development scenario, visitor trips would increase the traffic on rural roads that are narrow in places. However, under Alternative 2, there would be 40 fewer parking spots at the Garden Bar 40 parking area, and no equestrian spaces would be provided, so traffic along Garden Bar Road would be lessened. Because of the overall reduction in VMT and the reduced number of visitors who would be allowed to enter through the Garden Bar entrance, Alternative 2 would have less impacts on transportation and circulation than does the proposed project.

Air Quality

Construction of trails and recreational facilities under Alternative 2 would temporarily increase concentrations of reactive organic gases (ROG), oxides of nitrogen (NO_x), and respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀) in the project area. Construction under this alternative would also have the potential to temporarily increase the amount of diesel exhaust and fuel vapors in the project area. In addition,

long-term operation (use and maintenance) of the Park as part of this alternative would cause an increase in ROG, NO_x, and PM₁₀. There is a slight possibility that ground-disturbing activities under this alternative could also expose areas containing asbestos. However, this alternative would include fewer construction-related emissions than the proposed project because Alternative 2 would not widen Garden Bar Road and the size of parking lots and trailhead amenities would be reduced. Similar to construction-related impacts, the operation of Alternative 2 would generate fewer vehicle trips than the proposed project, so area source emissions would be less. Overall, impacts to regional air quality under Alternative 2 would be less than those of the proposed project.

Noise

Construction of trails and recreational facilities under Alternative 2 would temporarily increase noise levels in the project area. Construction activities under either development scenario are assumed to comply with the requirements of the Placer County Noise Ordinance. The nearest noise-sensitive receptors are located adjacent to the Twilight Ride trailhead entry. Alternative 2 would provide approximately 40% of the total parking spaces of the proposed project, so vehicle noise experienced along studied roadway segments would be less at buildout than the predicted levels for the proposed project. Similarly, Alternative 2 would reduce predicted noise exposure along Curtola Ranch Road because this road segment would not require widening given that removal of parking and amenities at the Harvego Preserve trailhead would reduce daily trips and associated levels of visitor attendance. Overall, Alternative 2 would result in lower construction and operational noise than the proposed project.

Hydrology and Water Quality

Implementation of Alternative 2 would require the installation of one less groundwater well to support water demand and would not require construction of the septic system at the Harvego Preserve trailhead. Removal of these components would eliminate a potential hazard to groundwater through demand reduction and elimination of a potential source of contamination. The potential for construction activity to create erosion during vegetation removal and grading for improvements could also affect water quality in the project area; however, this alternative would reduce the disturbance footprint since fewer spaces are provided than what would be provided with the proposed project. Alternative 2 reduces the size of the parking footprint and removes amenities at the Harvego Preserve trailhead. The footprint of the parking lot and amenities at each trailhead (with the exception of Mears) are less than that of the proposed project. Alternative 2 would comply with policies pertaining to water quality in the General Plan and would implement best management practices (BMPs). A grading and drainage plan would be prepared and implemented under either development scenario. Although mitigation measures would reduce impacts to less than significant for either the proposed project or for Alternative 2, the reduction in the number of wells and septic systems, as well as the reduction in grading, would have less of a potential impact on hydrology and water quality than the proposed project.

Biological Resources

Buildout of the proposed project would result in permanent disturbance to approximately 21 acres of land. Of this total, 7.7 acres would be permanently disturbed by the new trail network. As with the project, Alternative 2 would require construction of bridge crossings over Raccoon Creek and trail crossings over other unnamed drainages within the trail expansion areas. Under either development scenario, grading activity is needed to introduce the improvements needed to support the intended use, resulting in the removal of vegetation, including trees. Alternative 2 would have less potential than the proposed project to introduce invasive weeds because fewer

horses would be accommodated under this alternative; however, invasive weeds currently exist throughout area. Because this alternative would not include full buildout of the parking lot and trailhead amenities, potential impacts to biological resources would be less than what has been identified for the proposed project. Mitigation to reduce impacts on special-status species, oak woodlands, and waters of the United States would be applied under either development scenario. Because Alternative 2 requires less physical land disturbance, it would reduce the potential direct impacts to biological resources when compared to the proposed project.

Public Services and Utilities

Implementation of Alternative 2 would reduce the demand for services in comparison to the proposed project, given that fewer visitors can be accommodated by the reduced parking capacity available under this alternative, and the reservation system would control the number of visitors to match available parking. Like the proposed project, Alternative 2 would provide emergency personnel with improved access to rural areas of the County, which can aid responses by emergency personnel. Demand for potable water and sanitation would be met through the construction of new groundwater wells and septic systems. Solid waste would require collection and disposal under either development scenario. However, because there would be fewer helicopter landing zones and fewer water tanks available for emergency services, Alternative 2 would not meet the objectives of the full buildout project. Although it would not provide the same level of emergency service improvements as the proposed project, Alternative 2 would result in fewer visitors to the park, and the potential demand for public services and utilities would be less than those of the proposed project.

Hazardous Materials and Hazard

Like the project, Alternative 2 involves construction activity involving powered equipment that requires small amounts of hazardous material. An accidental-spill prevention and response plan would be developed to reduce potential impacts on human health from construction related lubricants, fuel, and solvents. Ground disturbance has the potential to expose construction workers to contaminants from prior activity on the site. The County would prepare a safety hazard plan and conduct soil sampling as necessary to reduce these impacts. Because of the smaller size of the parking lots, Alternative 2 would require less construction-related activity and would disturb less land, so the potential for exposure to contamination is slightly less than that of the proposed project.

Greenhouse Gas Emissions and Energy

Construction of the project would generate approximately 3,791 MT CO₂e over the entire construction period. These emissions sources include heavy-duty construction equipment, haul trucks, and construction worker vehicles. Construction-related GHG emissions would not exceed the Placer County Air Pollution Control District (PCAPCD) threshold of 10,000 MTCO₂e per year. Construction activity under Alternative 2 would generate fewer GHG emissions than the proposed project because a smaller footprint for grading results in fewer pieces of construction equipment operating on site.

Sources of operational related emissions of the project include motor vehicles and trucks, energy usage, water usage, and waste generation. The proposed project would generate approximately 6,419 MT CO₂e per year, which would be well below the operational threshold of 10,000 MT CO₂e per year established by the PCAPCD. With the reduction in parking capacity by over a half with Alternative 2, the resulting decrease in vehicle trips and related GHG emissions would be greater under Alternative 2 than under the proposed project.

Wildfire

Under either the proposed project or Alternative 2, land owned by Placer Land Trust (PLT) and outside the County's trail easement is actively managed by the PLT to reduce fuel load and minimize risk of wildfire, while land inside trail easements is to be managed by the County in a manner similar to the existing HFRP. While both the project and Alternative 2 would provide new roads and trails that improve emergency access, the proposed project would provide multiple parking lots of size sufficient to allow use by emergency responders as a base to coordinate firefighting activity. The proposed project also improves the ability to conduct aerial operations by constructing a helicopter landing zone at the Twilight Ride and Harvego Preserve entrances and by providing one Light Rescue Vehicle (LRV) for CAL FIRE operations during Phase 1 of the Twilight Ride parking lot construction. In contrast, Alternative 2 would provide only one additional helicopter landing zone and would not provide as many water tanks or wells as the proposed project.

Similar to the proposed project, Alternative 2 would construct small structures and attract visitors in areas of the County designated Moderate to High Fire Hazard Zone by the California Department of Forestry and Fire Protection (CAL FIRE 2019). Construction and operation of the expansion project under both the proposed project and Alternative 2 would create a potential for fire to be caused by construction equipment or by users of the trail expansion areas after construction. Prohibitions on smoking would be implemented in Alternative 2 in the same manner as the proposed project. Because there would be less construction activity and fewer people able to visit the areas under this Alternative 2, there would be fewer potential wildfire impacts than the proposed project, but this Alternative does not provide the same level of benefit with regard to helicopter landing zones and water tanks as does the proposed project.

REDUCED TRAILHEAD AMENITIES GARDEN BAR ACCESS ONLY (ALTERNATIVE 3)

Alternative 3 would construct all the project improvements except at the Garden Bar Road entrance, where only Phase 1A, Phase 1B, and Phase 1C of the improvements would take place. Alternative 3 would reduce the parking count at this entrance by 40 spaces, as it would eliminate Phases 2 and 3. Under Alternative 3, improvements include 30 miles of new native-surface trail system, two bridges crossing Raccoon Creek, access roads, parking lots accommodating a combined total of 325 new spaces (277 automobile and 48 equestrian trailer spaces), and three new trailheads accessing the trail system (supported with amenities such as picnic benches and tables, restrooms, and potable water). All phases of the proposed Twilight Ride and Harvego Preserve trailheads as well as the additional 25 parking spaces at the Mears Place entrance would be allowed. Access would remain controlled by the reservation system 7 days a week at the Garden Bar Road entrance.

Land Use and Agricultural Resources

Alternative 3 would be consistent with the *Placer County General Plan* (General Plan) the Placer County Zoning Ordinance and the Placer Legacy goals, as is the project. Similar to the project, Alternative 3 would not divide an established community, nor would it affect timber resources or operations. Grazing would be allowed to continue on the property. This alternative would not interfere with surrounding land uses. Because Alternative 3 would not conflict with any land use plans in the project area and grazing would be allowed to continue, potential impacts of Alternative 3 on land use, planning, and agricultural resources would be similar to those of the proposed project.

Soils, Geology, Seismicity, and Mineral Resources

Alternative 3 would require ground disturbance and grubbing of vegetation resulting in minor alterations to surface topography similar to that of the project. Like the project, Alternative 3 includes structures such as restrooms in the parking areas, overlooks along the trail, and two bridges over Raccoon Creek all of which would be subject to ground shaking, liquefaction, and landslides under either scenario. However, the project disturbance footprint is slightly smaller and the number of visitors who can attend on a daily basis is restricted so that slightly fewer guests are subject to hazards associated with earth movement than compared to the project. Like the proposed project, Alternative 3 is not located within an earthquake fault zone, no active faults are known to occur on site and no structures for human occupancy would be placed across any fault traces. The County would obtain authorization for construction and operation activities from the Central Valley Regional Water Quality Control Board (RWQCB) to protect water quality and permits from resource agencies to construct the two bridges over Raccoon Creek. Construction activity under either development scenario must implement erosion and sediment control measures obtain to reduce impacts on geology, soils, and seismicity under either development scenario. Because fewer parking spaces and therefore less grading occurs under Alternative 3, potential impacts of this alternative on soils, geology, and seismicity would be slightly less than those identified for the project.

Cultural and Tribal Cultural Resources

One prehistoric and two historic cultural resources are located within the project area. Alternative 3 is designed in a manner similar to that of the project which avoids direct impact to known resources. Like the project, Alternative 3 is subject to mitigation measures that reduce impacts on known and yet-to-be-discovered cultural resources. However, due to the slightly smaller grading footprint of Alternative 3, the potential impacts of Alternative 3 on cultural resources would be slightly less than those of the proposed project.

Visual Resources

Similar to the project, Alternative 3 would introduce new physical elements into the landscape but views of the planned trail system and recreational facilities from off-site locations would be limited by intervening topography and vegetation from most public vantage points. Under the proposed project, buildout of the full parking at the Garden Bar trailhead requires significant tree removal along Garden Bar Road. Under Alternative 3, Garden Bar Road would not be widened so the impacts to trees as a result of the widening would not occur, and this Significant and Unavoidable impact would be eliminated. Permanent ground disturbance under Alternative 3 would be less than that of the proposed project, because the Garden Bar parking area would be smaller in size. Consequently, less vegetation would be removed for grading required to prepare the site for the parking lot and trailhead amenities. Similar to the project, Alternative 3 would not affect scenic vistas, prominent rock outcroppings, or other notable feature on the site. Alternative 3 would avoid the loss of trees visible from Garden Bar Road and removes the significant unavoidable impact associated with the project. Therefore, impacts of Alternative 3 are significantly less than those of the project.

Transportation and Circulation

Because the number of parking stalls would be reduced at Garden Bar Road, Alternative 3 would generate a smaller number of vehicle trips traveling on local roads to and from the HFRP Expansion area in the Garden Bar area. Under either development scenario construction activity would require trips to deliver supplies and equipment to construct the improvements. These trips are expected to travel on Garden Bar Road, Bell Road,

Curtola Ranch Road, Mears Road and Lone Star as workers head to and from the active construction site. There would be a slight decrease in the amount of construction traffic required for Alternative 3 since the footprint of the Garden Bar parking area would be smaller.

Operation would generate slightly fewer daily trips than does the project because the available parking count would be reduced. Permits issued under the reservation system will reflect available parking spaces under either development scenario, so it is reasonable to conclude that Alternative 3 would slightly reduce trips on local roads and have slightly less impact on the operating capacity of the roadway network than does the project. Alternative 3 would reduce the number of daily vehicle trips on local roadways as compared to the proposed project, although it is unknown how many trips (if any) at the Twilight Ride and Harvego Preserve entrances would be affected by the reduction in available parking spaces at Garden Bar. Both the proposed project and Alternative 3 would contribute to the significant and unavoidable impacts due to increases in VMT because although Alternative 3 would reduce some VMT, the reduction in VMT is unknown, the project itself would remain inconsistent with the MTP/SCS and the County would still not have an established VMT threshold.

Safety related impacts of Alternative 3 would also be slightly less than those of the proposed project. Under either development scenario, visitor trips would increase the traffic on rural roads that are narrow in places. However, under Alternative 3, there would be 40 less parking spots at the Garden Bar 40 parking area, and no equestrian spaces would be provided, so traffic along Garden Bar Road would be lessened. Because of the reduced number of visitors who would be allowed to enter through the Garden Bar entrance, Alternative 3 would have slightly less impacts on transportation and circulation than does the proposed project.

Air Quality

Construction of trails and recreational facilities under Alternative 3 would temporarily increase concentrations of reactive organic gases (ROG), oxides of nitrogen (NO_x), and respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀) in the project area. Construction under this alternative would also have the potential to temporarily increase the amount of diesel exhaust and fuel vapors in the project area. In addition, long-term operation (use and maintenance) of the Park and Trail Expansion areas as part of this alternative would cause an increase in ROG, NO_x, or PM₁₀. There is a slight possibility that ground-disturbing activities under this alternative would also expose areas containing asbestos. Alternative 3 would generate slightly less construction-related emissions associated with heavy equipment operation because Garden Bar Road would not be widened and because the parking area size would be smaller than the proposed project. Due to fewer available parking spaces, and a subsequent reduction in the number of visitors, fewer vehicle trips would occur when compared to the project so impacts to regional air quality would be slightly less than those of the project.

Noise

Construction of trails and recreational facilities under Alternative 3 would temporarily increase noise levels in the project area. Construction activities associated with this alternative would comply with the requirements of the Placer County Noise Ordinance. The closest noise-sensitive receptors are located adjacent the Twilight Ride expansion project entry. Alternative 3 would widen Curtola Ranch Road to improve access to a new parking lot and recreational amenities at this trailhead. There would also be similar construction-related noise impacts at the Twilight Ride site, but less noise would be generated at the Garden Bar Road location. Long-term operation (use and maintenance) of the HFRP trail expansion area at the Garden Bar entrance would be less intensive under

Alternative 3 and would result in a reduction in predicted noise impacts when compared to the project. Therefore, Alternative 3 would have slightly less impact compared to the project on local noise.

Hydrology and Water Quality

Implementation of Alternative 3 would require installation of new groundwater wells and septic systems at the proposed trailheads. Potential erosion from vegetation removal and grading activity could also affect water quality in the project area; however, this alternative would not disturb as much land area during earthmoving activities because the size of parking area at the Garden Bar entry would be reduced by 40 spaces. Like the project, this alternative would comply with policies pertaining to water quality in the General Plan and would implement BMPs to reduce erosion and sedimentation effects. A grading and drainage plan would be prepared and implemented under either development scenario and the County would obtain a Transient Non-community Water System Permit to reduce these impacts to a less-than-significant level. Alternative 3 would have slightly less potential impact on hydrology and water quality to that of the proposed project.

Biological Resources

Land disturbance with the proposed project was estimated to be approximately 41.8 acres. Of this total, trails represent 7.7 acres, and the remainder of disturbance involves improvements at the trailheads. As with the project, Alternative 3 would require construction of two bridge crossings over Raccoon Creek and trail crossings over other unnamed drainages within the trail expansion areas. Under either development scenario, grading activity is needed although fewer trees would be removed by Alternative 3 because Garden Bar Road would not be widened. Under either development scenario, mitigation to reduce impacts on special-status species, oak woodlands, and waters of the United States would be required. But because Alternative 3 does not require the removal of oak trees along Garden Bar Road, and its area of grading is less than that of the proposed project, it would have less potential impact on biological resources than the proposed project.

Public Services and Utilities

Alternative 3 would result in less demand on public services and utilities because fewer visitors can be accommodated at the Garden Bar Road entry and the permit requirements regulates the number of visitors who can use the site. Alternative 3 would improve access to rural areas of the County, as does the project, which can aid the response by emergency personnel. As with the proposed project, this alternative would provide for the collection and disposal of solid waste. Because Alternative 3 would result in slightly fewer visitors to the park, the demand for public services and utilities would be slightly less than those of the proposed project.

Hazardous Materials and Hazards

Like the proposed project, Alternative 3 involves construction activity involving powered equipment that requires small amounts of hazardous material. An accidental-spill prevention and response plan would be developed under either development scenario in order to reduce potential impacts on human health from construction related lubricants, fuel, and solvents. The County would also coordinate with the Placer Mosquito and Vector Control District (Vector Control District), create a safety hazard plan, and conduct soil sampling as necessary to reduce these impacts. Because Alternative 3 requires less grading and pavement improvements than the proposed project, Alternative 3 would result in the potential for slightly fewer hazards and hazardous materials-related impacts than the proposed project.

Greenhouse Gas Emissions and Energy

Construction of the proposed project would generate approximately 3,791 MT CO₂e over the entire construction period. These emissions sources include heavy-duty construction equipment, haul trucks, and construction worker vehicles. To estimate amortized construction emissions, the total construction-related GHG emissions of 3,791 MT CO₂e associated with the project are divided by 30 years (approximately 116 MT CO₂ per year). As such, the construction-related GHG emissions would be less than the adopted or proposed GHG emissions on an amortized basis would not exceed the Placer County Air Pollution Control District (PCAPCD) construction threshold of 10,000 MTCO₂e per year. Construction activity under Alternative 3 would generate slightly fewer GHG emissions since a smaller footprint for grading results in fewer pieces of construction equipment operating on site.

Sources of operational related emissions of the project include motor vehicles and trucks, energy usage, water usage, and waste generation. As described above the PCAPCD adopted a GHG operational threshold of 10,000 MT CO₂e per year. The proposed project operation would generate approximately 6,419 MT CO₂e per year, which would be well below the operational threshold of 10,000 MT CO₂e per year. With the reduction in parking capacity by 40 stalls associated with Alternative 2, it is reasonable to assume the resulting decrease in vehicle trips and related GHG emissions would slightly reduce the impact as compared to the proposed project.

Wildfire

Similar to the project, Alternative 3 would construct small structures and attract visitors in areas of the County designated Moderate to High Fire Hazard Zone by the California Department of Forestry and Fire Protection (CAL FIRE 2019). Construction and operation of the expansion project under either development scenario could create a potential for fire to be caused by construction equipment or by users of the trail expansion areas after construction. Because there would be less construction activity and fewer people able to visit the area under Alternative 3, there would be fewer potential wildfire impacts than the proposed project.

17.4.1 SUMMARY OF ALTERNATIVES ANALYSIS

A comparison of the proposed project, the No Project Alternative, the Reduced Trailhead Amenities Alternative 2, and the Reduced Trailhead Amenities Garden Bar Access Only Alternative 3 is presented in Table 17-1 below. This table shows the advantages and disadvantages of these alternatives relative to the proposed project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative would be the No Project Alternative; however, according to the State CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, an environmentally superior alternative must be selected from the other alternatives.

Based on the foregoing analysis, the environmentally superior alternative among the other alternatives is Alternative 2, Reduced Trailhead Amenities Alternative. Alternative 2 would alleviate the severity of significant project impacts to the visual character of Garden Bar Road. Alternative 2 requires less land disturbance because road widening at Garden Bar Road is not required. Keeping Garden Bar Road at its present width avoids tree removal and the Significant and Unavoidable impact to Visual Resources would be eliminated. In addition, although Alternative 2 would not eliminate the significant and unavoidable impacts to traffic, it would substantially reduce the vehicle trips on local roads. Less ground disturbance is required to implement this

alternative, and fewer air emissions would be generated during construction and operation. Lastly, selection of Alternative 2 would decrease activity at the three new proposed trailheads, so the demand for public services and utilities would be less than that of the project.

While Alternative 2 would reduce significant project impacts, it would not go as far toward meeting the project objectives as fewer visitors could be accommodated. Alternative 2 would also not provide the same level of benefit to the community offered by the project because it reduces the number of water tanks and helipads for use in fighting wildfires. Lastly, Alternative 2 would not provide any equestrian facilities at either the Garden Bar or Harvego Preserve entrances, and no permanent restroom would be provided at the Harvego Preserve. Objectives not as fully achieved with Alternative 2 as with the proposed project include:

- ▶ Implement the recreational resource objectives of the Placer Legacy Open Space and Agricultural Conservation Program (available at <https://www.placer.ca.gov/3420/Placer-Legacy>), beginning on page 3-17 that aim to “...enhance recreational opportunities in the County by improving public trail access, including the construction of staging areas and parking lots, as well as the purchase of public access easements on private land to provide connections to public land and city trail connections” and “provide regional recreational facilities in the foothill region, supplementing the recreation opportunities provided on public lands to the east and municipal park facilities in urbanized areas. South Placer residents would be served by one or more large regional parks (300 acres or greater) in a rural setting with a variety of passive recreation opportunities. Such a park may be connected with larger area of protected land, providing additional wildlife habitat value.”
- ▶ Expand the existing multi-use, natural-surface trail system to provide recreational opportunities for the residents of Placer County and the region, while maintaining safety for park users, visitors, and nearby residents.

Table 17-1. Comparison of Environmental Impacts for HFRP Trails Expansion Project Alternatives

Issue Area	No Project (Alternative 1)	Reduced Access (Alternative 2)	Reduced Access for Garden Bar Road Only (Alternative 3)
Land Use and Agricultural Resources	Less	Similar	Similar
Biological Resources	Less	Less	Less
Cultural Resources and Tribal Cultural Resources	Less	Less	Slightly Less
Visual Resources	Less	Significantly Less	Significantly Less
Transportation and Circulation	Less	Slightly Less	Slightly Less
Air Quality	Less	Less	Slightly Less
Noise	Less	Less	Slightly Less
Soils, Geology, Seismicity, and Mineral Resources	Less	Less	Slightly Less
Hydrology and Water Quality	Less	Less	Slightly Less
Public Services and Utilities	Less	Less	Slightly Less
Hazardous Materials and Hazards	Less	Slightly Less	Slightly Less
Greenhouse Gas Emissions and Energy	Less	Less	Slightly Less
Wildfire	Less	Less	Slightly Less