10. ALTERNATIVES ANALYSIS
10. ALTERNATIVES ANALYSIS

10.1 INTRODUCTION
The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required pursuant to 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.

10.2 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. Create a foothill residential project that can easily be served by planned sewer, water and roadway infrastructure.
2. Support the County in its goals to provide a diversity of housing types for population growth, including opportunities for custom home development.
3. Provide a high-quality residential community compatible and consistent with adjacent approved residential development by implementing complementary design elements and standards approved for the adjacent development.
4. Incorporate the existing natural terrain and character of the project area into the design of the development, recognizing its topography with slopes, ridges and oak woodlands while respecting off-site viewsheds and retaining and preserving existing natural resources to the greatest extent feasible.

**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 impacts related to substantially degrading the existing visual character or quality of public views of the project site and/or the site’s surroundings would be less than significant. In addition, all cumulative impacts were determined to be less than cumulatively considerable.

- **Air Quality, Greenhouse Gas Emissions, and Energy.** The EIR determined that impacts related to conflicting with or obstructing a State or local plan for renewable energy or energy efficiency, or conflicting with or obstructing implementation of the applicable air quality plan during both project construction and operation, would be less than significant. In addition, the EIR determined that the project would result in a less-than-significant impact related to exposing sensitive receptors to substantial pollutant concentrations. With respect to cumulative impacts, all such impacts, including impacts related to the emissions of greenhouse gas (GHG), were determined to be less than cumulatively considerable.

- **Biological Resources.** The EIR determined that impacts related to wildlife movement would be less than significant.

- **Transportation and Circulation.** The EIR determined that a less-than-significant impact would occur related to transit, bicycle, and pedestrian facilities, as well as emergency access, hazardous design features, and incompatible uses.

- **Wildfire.** The EIR determined that a less-than-significant impact would occur related to the substantial impairment of an adopted emergency response plan or emergency evacuation plan. In addition, the EIR determined that a less-than-significant impact would occur related to requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Furthermore, because the project includes design features which would create defensible space and a Modified Shaded Fuel Break, and because the project site is subject to a low risk of landslides, the impact related to exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be less than significant. For the same reasons, cumulative impacts related to an increase in wildfire risk attributable to the proposed project in combination with cumulative development was determined to be less than significant.

The Initial Study prepared for the proposed project during the scoping period (see Appendix C) includes a detailed environmental checklist addressing a range of technical environmental issues. For each technical environmental issue, the Initial Study identifies the level of impact for the proposed project. The Initial Study identifies the environmental effects as either “no impact,” “less-than-significant,” “less-than-significant with mitigation incorporated,” or “potentially significant.”
Impacts identified for the proposed project in the Initial Study as “no impact,” “less-than-significant,” or “less-than-significant with mitigation incorporated” are listed below, and summarized further in Chapter 1, Introduction, of this EIR.

- Aesthetics (Items I-1 and I-2);
- Agriculture and Forest Resources (All Items);
- Air Quality (Item III-4);
- Cultural Resources (All Items);
- Geology and Soils (All Items);
- Hazards and Hazardous Materials (Items IX-1 through IX-6);
- Hydrology and Water Quality (All Items);
- Land Use and Planning (Items XI-1, XI-3, and XI-4);
- Mineral Resources (All Items);
- Noise (All Items);
- Population and Housing (All Items);
- Public Services (All Items);
- Recreation (All Items);
- Transportation (Item XVII-4);
- Tribal Cultural Resources (All Items); and
- Utilities and Service Systems (All Items).

The alternatives discussed herein have been chosen based on feasibility to meet project objectives, as well as the ability to reduce potential impacts analyzed within this EIR. Impacts identified and fully mitigated in the Initial Study prepared for the proposed project would be similar or fewer for all of the alternatives included in this chapter. Accordingly, topics dismissed within the Initial Study prepared for the proposed project are not specifically addressed within the sections below. 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 substantially 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.

- **Biological Resources.** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, VELB, western spadefoot, grasshopper sparrow, northern harrier, purple martin, and white-tailed kite, as well as Swainson’s hawk. Furthermore, the project could result in a substantial adverse effect on federal or State protected wetlands. Given that the proposed project would involve the
removal of mixed oak woodland and oak-foothill pine woodland, the project could conflict with local policies and/or ordinances that protect biological resources, including tree resources, and could conflict with the provisions of an adopted Habitat Conservation Plan. 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 cumulatively considerable. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be reduced to either less-than-significant or less-than-cumulatively considerable levels.

- **Transportation and Circulation.** The EIR determined that implementation of the proposed project could 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.

- **Wildfire.** The EIR determined that implementation of the project could result in a significant impact related to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, the EIR requires mitigation to ensure implementation of all Action Items presented within the Fire Safe Plan, which would ensure that the aforementioned impact is reduced to a less-than-significant level.

**Significant and Unavoidable**

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

- **Transportation and Circulation.** Given that the per-capita VMT associated with the proposed project would exceed the applicable threshold (i.e., VMT per capita for the project is less than 15 percent below the unincorporated County baseline average), the EIR determined that the project could conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and a significant and unavoidable impact would occur.

**10.3 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 one or more significant project 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 proposed project. Specifically, the parcel located immediately north of the project site, known as La Faille Ranch, is owned by the same property owner as the project site. La Faille Ranch has been subject to previous planning efforts, one of which is shown in Figure 10-1 below. The former vesting tentative map includes 14 residential lots ranging from 10 to 15.39 acres in size. While the proposed project would be accessed by the future extension of Bickford Ranch Road, the Off-Site Alternative at La Faille Ranch would be accessed via an existing stretch of State Route 193.

The Off-Site Alternative would include a high-quality, large lot residential development that can be accommodated by existing and planned infrastructure. In addition, the Alternative would include opportunities for home customization, and, due to the proposed land use type and intensity of development, would be considered compatible and consistent with the nearby Bickford Ranch Specific Plan (BRSP) development and nearby rural residential parcels. Therefore, the Off-Site Alternative would generally achieve Objectives 1, 2, and 3. However, as discussed in further detail below, the Off-Site Alternative would not achieve Objective 4 because the Alternative would not preserve existing natural resources to the greatest extent feasible.
Figure 10-1
Off-Site Alternative
The La Faille Ranch site includes almost 18 acres of wetlands, including several seasonal wetlands, three creeks, and a pond. For comparison, the proposed project site includes three seasonal wetlands totaling 0.11-acre within the southwest and southeast portions of the project site. In an effort to reduce impacts to wetlands, the Off-Site Alternative would include several bridges to cross over the existing wetlands, and would design residences to avoid wetlands, as feasible. Nonetheless, even with the inclusion of bridges and strategic project design, the Alternative would adversely affect substantially more wetland area as compared to the proposed project. The Alternative would not only result in increased impacts to wetlands, as compared to the proposed project, but also potentially greater impacts to special-status plant and animal species which rely on wetland habitat.

In addition, based on an Oak Woodland Inventory Report that was previously prepared for the La Faille Ranch site, impacts to oak woodlands related to roadway infrastructure alone (not including impacts from development of individual lots) would be similar to the proposed project, though slightly reduced (6.67 acres versus 7.92 acres). When factoring in oak woodland impacts associated with lot development for the Off-Site Alternative, the impact acreage would be increased, and possibly greater, than the proposed project. As a result, the impact level related to conflicting with any local policies or ordinances protecting biological resources, such as tree preservation and avoidance policies, would remain significant and require implementation of mitigation.

As noted above, CEQA Guidelines state that the primary intent of an alternative is to disclose other ways that the objectives of the project could be attained while reducing one or more of the significant environmental impacts of the proposed project. Considering the Off-Site Alternative would result in additional impacts related to biological resources, the Alternative would not achieve the intent of a feasible alternative under CEQA. 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;
- Clustered Development Alternative; and
- Large-Lot Residential Alternative.

See Table 10-3 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

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
The County has decided to evaluate a No Project (No Build) Alternative, which assumes that the project site would remain in its current condition and would not be developed. As described in this EIR, the project site consists primarily of grasses, oak woodland, and scattered rock outcroppings and is absent of structures. The No Project (No Build) Alternative would not meet any of the project objectives.

### Aesthetics
The EIR determined that the proposed project could have a significant impact to nearby sensitive receptors as a result of the introduction of substantial 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, Greenhouse Gas Emissions, and Energy
The following discussion is provided for informational purposes only, given that this EIR determined the proposed project would not result in any significant impacts related to air quality, GHG emissions, or energy.

The EIR did not identify any significant impacts related to air quality, GHG emissions, or energy from implementation of the proposed project. Given the project site would remain as is under the No Project (No Build) Alternative, no impacts related to air quality, GHG emissions, and energy would occur.

### 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, western spadefoot, grasshopper sparrow, northern harrier, purple martin, and white-tailed kite. The Alternative would not include removal of mixed oak woodland and oak-foothill pine woodland and, thus, would not conflict with any local policies and/or ordinances that protect biological resources, including tree resources. In addition, the Alternative would not result in any substantial adverse effects on federal or State protected aquatic resources. Mitigation Measures 6-1(a) through 6-1(c), 6-2(a) through 6-2(c), 6-5(a) through 6-5(d), 6-7(a) and 6-7(b), 6-9, 6-10, 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.

### 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 7-1 related to preparation and implementation of a construction signing and traffic control plan would not be required. In addition, the Alternative would not result in a significant and unavoidable impact related to VMT and,
therefore, Mitigation Measure 7-5 would not be required. Overall, impacts related to transportation and circulation would not occur under the No Project (No Build) Alternative.

**Wildfire**
Habitable structures would not be constructed on-site under the No Project (No Build) Alternative. As a result, fewer impacts related to exposing people or structures to significant risk would occur. In addition, because residents would not occupy the project site, Mitigation Measure 8-2 would not be required. However, the Modified Shaded Fuel Break included as part of the proposed project would not be constructed under the No Project (No Build) Alternative; therefore, the fuel reduction efforts adjacent to the BRSP would not occur and, thus, an increased risk of wildfire to future BRSP structures could result. Nonetheless, the impacts identified for the proposed project related to wildfire would not occur under the No Project (No Build) Alternative.

**Clustered Development Alternative**
The Clustered Development Alternative would cluster the proposed single-family lots along the southern portion of the project site in an effort to avoid all on-site oak woodland habitat. Based upon the information provided in the Biological Resources Assessment for the project site, this would equate to the preservation of approximately 12.72 acres of woodland habitat, whereas the proposed project would preserve approximately 4.75 acres of the on-site oak woodland habitat (12.72 total acres – 7.97 impacted acres). This would also have the further benefit of setting back the structures from the ridgeline, thus, meeting General Plan Policy 1.K.1(a), by avoiding the location of structures along ridgelines.

Given the limited land area available for development under the Alternative, the internal roadway would be eliminated and direct access to the lots would be provided by Bickford Ranch Road. Thus, homes would front Bickford Ranch Road, and, in order to minimize the number of driveways connecting to Bickford Ranch Road, tandem driveways would be provided. As shown in Figure 10-2, it is estimated that 15 homes would front Bickford Ranch Road. Two additional residential lots and a stormwater detention/retention basin lot would be provided in the southwest corner of the project site, with access from a new cul-de-sac. Thus, the total number of single-family homes under this Alternative would be 17, which is half of the proposed project’s density. This Alternative would require a General Plan Amendment to redesignate the site from Agriculture/Timberland 10-Ac. Min. to Low Density Residential (1-5 dwelling units per net acre [du/ac]) and a rezone from Farm, combining minimum Building Site of 10 acres (F-B-X 10-Ac. Min.) to Residential Single-Family, combining minimum Building Site anticipated to be 8,000 square feet.

Similar to the proposed project, the Alternative would include the establishment and on-going maintenance of an off-site, 300-foot-wide Modified Shaded Fuel Break (MSFB) along the project’s northern boundary, north of the Caperton Canal. It is assumed that the intervening, on-site oak woodland would also be managed for fuel reduction purposes.

Because the Clustered Development Alternative would include development of the project site with residential uses adjacent to the BRSP, Objective 1 would be met. While the Clustered Development Alternative would result in project structures being set further back from the ridgeline, the Alternative would not include the project’s landscape buffer along Bickford Ranch Road. Thus, although the alternative would meet Objective 3 (e.g., provide high quality residential community compatible and consistent with adjacent approved residential development), it may not satisfy the objective to the same extent as the proposed project.
Figure 10-2
Clustered Development Alternative

- Parcel Boundary ±25 Acres
- Study Area ±56.8 Acres
- Fire Safe Plan Easement - 24.9 Acres
- Caperton Canal
Considering the Clustered Development Alternative would include only 17 residential units as compared to the proposed 34 units, Objective 2, which aims to provide housing to accommodate population growth, would be achieved to a lesser extent. Because the Alternative would avoid oak woodland habitat, Objective 4 would be met.

**Aesthetics**

As noted in the description above, the Clustered Development Alternative would situate the residential units further from the ridgeline, in compliance with General Plan Policy 1.K.1(a). Similar to the proposed project, the Clustered Development Alternative would introduce new sources of light and glare to the project site where none currently exist. Such sources would include, but would not be limited to, vehicle headlights, exterior lighting fixtures, interior light spilling through windows, and light reflected off of windows. Considering that the Clustered Development Alternative would involve the development of fewer units on-site, the project site would be anticipated to produce proportionately less light and glare as compared to the proposed project. Although less light and glare would be produced within the project site, Mitigation Measure 4-2 would still be required.

While not determined to be a significant impact for the proposed project, changes to the visual character or quality of the site and surrounding area under the Clustered Development Alternative would be further minimized, as compared to the proposed project, due to the preservation of more on-site oak woodland habitat and the reduced project footprint. Nevertheless, a noticeable change in the visual character of the site would still occur under the Alternative, as viewed from Bickford Ranch Road, due to the introduction of 17 single-family residences on the project site. In addition, the landscape buffer along the proposed project’s Bickford Ranch Road frontage would be eliminated under this Alternative, thereby making project structures more visible from Bickford Ranch Road.

Overall, impacts related to aesthetics could be considered similar under the Clustered Development Alternative compared to the proposed project.

**Air Quality, Greenhouse Gas Emissions, and Energy**

The following discussion is provided for informational purposes only, given that this EIR determined the proposed project would not result in any significant impacts related to air quality, GHG emissions, or energy.

Based on the CalEEMod modeling conducted for the proposed project, the development of the entire proposed project site and 34 residential units would generate construction-related and operational criteria pollutant and GHG emissions below the applicable PCAPCD thresholds of significance. Under the Clustered Development Alternative, a smaller area of ground disturbance would be impacted and fewer residential units would be constructed. Therefore, it can reasonably be assumed that criteria pollutant and GHG emissions associated with development of the Alternative would be fewer than those associated with development of the proposed project. In addition, because the Alternative would provide housing for fewer overall residents, fewer vehicle trips would occur under the Alternative and, thus, mobile-sourced GHG emissions would be reduced as compared to the proposed project. Furthermore, because the Alternative would preserve an additional 7.97 acres of oak woodland, the loss of carbon sequestration associated with tree removal would be prevented under the Alternative.
With regard to renewable energy and energy efficiency, both the proposed project and the Alternative would be subject to the requirements included within the 2019 California Building Standards Code and the Placer County Sustainability Plan. In addition, the Alternative would result in less energy demand during operations due to the reduced number of units. As a result, the Alternative would result in fewer impacts related to energy.

Based on the above, impacts related to air quality, GHG emissions, and energy would be fewer under the Clustered Development Alternative compared to the proposed project.

**Biological Resources**

Similar to the proposed project, the Clustered Development Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status plants, western spadefoot, grasshopper sparrow, northern harrier, purple martin, and white-tailed kite and other migratory birds. Accordingly, Mitigation Measures 6-1(a) through (c), 6-2(a) through (c), 6-5(a) through (e), and 6-11 would still be required. While impacts could still occur, because the Alternative would avoid the on-site oak woodland, the potential for impacts to protected species associated with such habitat would be reduced. Although the Alternative would affect a smaller development footprint, development of the Alternative would likely affect the same 0.11-acre seasonal wetlands as the proposed project given their locations along the southwestern and southeastern project boundaries. As a result, Mitigation Measures 6-6(a) and (b) would still be required.

As noted above, the Clustered Development Alternative would avoid the on-site oak woodland. Therefore, the impact related to conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy, and the impact related to conflicting with the provisions of an adopted Habitat Conservation Plan would be reduced. However, Mitigation Measures 6-8 and 6-9 would still be required due to other land conversion (e.g., annual grassland) and need to comply with PCCP General Conditions.

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

**Transportation and Circulation**

Similar to the proposed project, the Clustered Development Alternative would add construction vehicle traffic to area roadways, thereby potentially conflicting with existing traffic patterns. As such, Mitigation Measure 7-1, which requires the preparation and implementation of a construction signing and traffic control plan, would still be required. However, because the Alternative would involve the construction of 17 residential units, as compared to 34 units under the proposed project, the overall intensity of construction traffic and timeline of the construction period, and associated impacts, would be reduced.

Based on vehicle trip generation rates provided in the Technical Memorandum prepared for the proposed project by Fehr and Peers (see Appendix F), the Clustered Development Alternative would result in approximately 161 average daily trips (ADT) during operations, as compared to 322 ADT occurring with development of the proposed project (see Table 10-1).

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1 Fehr and Peers, Draft Technical Memorandum – The Ridge Subdivision. August 6, 2020


Pursuant to CEQA Guidelines Section 15064.3, VMT is now used as the metric to analyze transportation impacts rather than LOS. While LOS will still be used by the County for purposes of determining consistency with General Plan and community plan goals and policies, LOS is no longer used for determining significant impacts under CEQA. Conflicts with General Plan LOS standards for study intersections or roadway segments were not identified for the proposed project.

Due to the project location and proposed land use type, both the proposed project and the Alternative would generate the same VMT per capita of 29.55. However, considering the Alternative would support 50 percent fewer residents, total VMT associated with the project would be half of the total VMT associated with the proposed project. In addition, according to the Placer County Transportation Study Guidelines screening criteria, small projects, which includes projects with 17 or fewer single-family dwelling units such as the Alternative, are presumed to result in a less-than-significant impact related to VMT. As a result, Mitigation Measure 7-5 would not be required, and the significant and unavoidable impact related to VMT would be eliminated.

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

**Wildfire**
Similar to the proposed project, the Clustered Development Alternative would include the establishment and on-going maintenance of an off-site MSFB. In addition, it is assumed that the intervening, on-site oak woodland would also be managed for fuel reduction purposes, thereby creating an even greater fuel break area that could further minimize the potential to exacerbate the spread of a wildfire occurring in the area. Overall, because only 17 residential units would be developed, as opposed to the 34 proposed as part of the project, and an increased fuel management area would be provided, risks related to Wildfire would be slightly reduced as compared to the proposed project.

**Large-Lot Residential Alternative**
This alternative would include development of the project site at a reduced density using larger residential lots. It is assumed that lots would be 2.3 acres in size, thus resulting in a development potential of 10 single-family homes (see Figure 10-3). The 10 lots are assumed to be custom, non-pad graded lots, thereby increasing the potential for tree retention during home design and construction.

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**Table 10-1**

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Figure 10-3
Large-Lot Residential Alternative

- Parcel Boundary ±25 Acres
- Study Area ±56.6 Acres
- Fire Safe Plan Easement - 24.9 Acres
- Caperton Canal
This Alternative would require a General Plan Amendment to redesignate the site from Agriculture/Timberland 10-Ac. Min. to Rural Residential (1-10 acre minimum) and a rezone from F-B-X 10-Ac. Min. to Residential Agricultural 2.3-acre minimum. Similar to the proposed project, this Alternative would also include a separate lot for a detention/retention basin and vehicle access would be from driveways connecting to Bickford Ranch Road, or from two on-site private laneways.

Similar to the proposed project, this Alternative would include the establishment and on-going maintenance of an off-site, 300-foot-wide MSFB along the project’s northern boundary, north of the Caperton Canal.

Because the Large-Lot Residential Alternative would include development of the project site with residential uses adjacent to the BRSP, Objectives 1 and 3 would be met. However, considering the Alternative would include only 10 residential units as compared to the proposed 34 units, Objective 2, which aims to provide housing to accommodate population growth, would be achieved to a lesser extent. Because the Alternative would have the potential to reduce tree removal, Objective 4 would be met.

Aesthetics
Similar to the proposed project, the Large-Lot Residential Alternative would introduce new sources of light and glare to the project site where none currently exist. Such sources would include, but would not be limited to, vehicle headlights, exterior lighting fixtures, interior light spilling through windows, and light reflected off of windows. Considering that the Large-Lot Residential Alternative would involve the development of fewer units on-site, the project site would be anticipated to produce less light and glare as compared to the proposed project. Although less light and glare would be produced within the project site, Mitigation Measure 4-2 would still be required.

While not determined to be a significant impact for the proposed project, changes to the visual character or quality of the site and surrounding area under the Large-Lot Residential Alternative would be further minimized, as compared to the proposed project, due to the reduced development density. Nevertheless, a noticeable change in the visual character of the site would still occur under the Alternative, as viewed from Bickford Ranch Road, due to the introduction of 10 single-family residences on the project site. In addition, the landscape buffer along the proposed project’s Bickford Ranch Road frontage would be eliminated under this Alternative, thereby making project structures more visible from Bickford Ranch Road.

Overall, impacts related to aesthetics could be considered similar under the Large-Lot Residential Alternative compared to the proposed project.

Air Quality, Greenhouse Gas Emissions, and Energy
The following discussion is provided for informational purposes only, given that this EIR determined the proposed project would not result in any significant impacts related to air quality, GHG emissions, or energy.

Based on the CalEEMod modeling conducted for the proposed project, the development of the proposed project site with 34 residential units would generate construction-related and operational criteria pollutant and GHG emissions below the applicable PCAPCD thresholds of significance. Under the Large-Lot Residential Alternative, fewer residential units would be constructed on a
similar area of disturbance. Therefore, it can reasonably be assumed that criteria pollutant and GHG emissions associated with development of the Alternative would be fewer than those associated with development of the proposed project. In addition, because the Alternative would provide housing for fewer overall residents, fewer vehicle trips would occur under the Alternative and, thus, mobile-sourced GHG emissions would be reduced as compared to the proposed project.

With regard to renewable energy and energy efficiency, both the proposed project and the Alternative would be subject to the requirements included within the 2019 California Building Standards Code and the Placer County Sustainability Plan. In addition, due to the reduced number of units, the Alternative would result in less energy demand during operations. As a result, the Alternative would result in fewer impacts related to energy.

Based on the above, impacts related to air quality, GHG emissions, and energy would be fewer under the Large-Lot Residential Alternative compared to the proposed project.

**Biological Resources**
Similar to the proposed project, the Large-Lot Residential Alternative would include ground-disturbing activities on the project site and, thus, would have the potential to impact special-status plants, western spadefoot, grasshopper sparrow, northern harrier, purple martin, and white-tailed kite and migratory birds. Thus, Mitigation Measures 6-1(a) through (c), 6-2(a) through (c), 6-5(a) through (e), and 6-11 would still be required. While the Alternative includes the same overall development area, because only 10 residential lots would be included, as opposed to 34 under the proposed project, it is reasonable to expect that much of the large 2.3-acre lots would remain undeveloped, as the lots would not be mass-graded, but custom graded. Accordingly, the severity of impacts to protected species could reasonably be expected to be reduced compared to the proposed project. Development of the Alternative would likely affect the same 0.11-acre seasonal wetlands as the proposed project and, as a result, Mitigation Measures 6-6(a) and (b) would still be required.

As noted above, the Large-Lot Residential Alternative would have increased potential for tree retention. However, actual tree preservation cannot be quantified without home design and construction plans and, therefore, it is anticipated that Mitigation Measures 6-9 and 6-10 may still be required.

Overall impacts to biological resources would be similar or slightly less under the Alternative compared to the proposed project.

**Transportation and Circulation**
Similar to the proposed project, the Large-Lot Residential Alternative would add construction vehicle traffic to area roadways, thereby potentially conflicting with existing traffic patterns. As such, Mitigation Measure 7-1, which requires the preparation and implementation of a construction signing and traffic control plan, would still be required. However, because the Alternative would involve the construction of 10 residential units, as compared to 34 units under the proposed project, the overall intensity of construction traffic and timeline of the construction period, and associated impacts, would be reduced.
Based on vehicle trip generation rates provided in the Technical Memorandum prepared for the proposed project by Fehr and Peers (see Appendix F), the Large-Lot Residential Alternative would result in approximately 94 ADT during operations, as compared to 322 ADT occurring with development of the proposed project (see Table 10-2).

<table>
<thead>
<tr>
<th>Table 10-2</th>
<th>Trip Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Quantity (units)</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed Project</td>
<td>34</td>
</tr>
<tr>
<td>Large-Lot Residential Alternative</td>
<td>10</td>
</tr>
<tr>
<td><strong>Difference</strong></td>
<td><strong>-24</strong></td>
</tr>
</tbody>
</table>


However, considering conflicts with General Plan LOS standards for study intersections or roadways segments were not identified for the proposed project, the Alternative would, similarly, not be expected to conflict with LOS standards. As noted previously, LOS is not a CEQA consideration, but is still used by the County for purposes of determining consistency with General Plan and community plan goals and policies.

Due to the project location and proposed land use type, both the proposed project and the Alternative would generate the same VMT per capita of 29.55. However, considering the Alternative would be assumed to house fewer residents, total VMT associated with the project would be reduced as compared to the total VMT associated with the proposed project. In addition, as noted previously, small projects, including the Alternative, are presumed to result in a less-than-significant impact related to VMT, pursuant to the County’s Transportation Study Guidelines screening criteria. As a result, Mitigation Measure 7-5 would not be required, and the significant and unavoidable impact related to VMT would be eliminated.

Overall, development of the Large-Lot Residential Alternative would result in fewer impacts related to Transportation and Circulation compared to the proposed project.

**Wildfire**

Similar to the proposed project, the Large-Lot Residential Alternative would include the establishment and on-going maintenance of an off-site Fuel Management Zone easement. In addition, Mitigation Measure 8-2 would still be required in order to reduce potential risks to future residents. However, because only 10 residences would be developed under the Alternative, as compared to the 34 associated with the proposed project, impacts related to Wildfire would be fewer than the proposed project.

### 10.4 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.

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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 10-3.

The No Project (No Build) Alternative would not meet any of the project objectives. Both the Clustered Development Alternative and the Large-Lot Residential Alternative would meet Objectives 1 and 3; although, as previously noted, the Clustered Development Alternative would not satisfy Objective 3 to the same degree as the proposed project. The Clustered Development Alternative would include the development of more units than the Large-Lot Residential Alternative and, therefore, would more substantially achieve Objective 2. In addition, because the Clustered Development Alternative would avoid on-site oak woodland, the Alternative would fully achieve Objective 4. Although the Large-Lot Residential Alternative has the potential to avoid oak trees, the full implementation of Objective 4 cannot be ensured at this time.

As discussed throughout this chapter and shown in Table 10-3, both the Clustered Development Alternative and the Large-Lot Residential Alternative would result in fewer impacts than the proposed project related to air quality, GHG emissions, energy; transportation and circulation; and wildfire. Because the Clustered Development Alternative would result in a smaller area of disturbance, the Alternative would result in fewer impacts to biological resources and, specifically, fewer impacts to oak woodlands.

Based on the above, the Clustered Development Alternative would be considered the environmentally superior alternative to the proposed project.
# Table 10-3

## Comparison of Environmental Impacts for Project Alternatives

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Proposed Project</th>
<th>No Project (No Build) Alternative</th>
<th>Clustered Development Alternative</th>
<th>Large-Lot Residential Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetics</td>
<td>Less-Than-Significant with Mitigation</td>
<td>None</td>
<td>Similar</td>
<td>Similar</td>
</tr>
<tr>
<td>Air Quality, Greenhouse Gas Emissions, and Energy</td>
<td>Less-Than-Significant</td>
<td>None</td>
<td>Fewer</td>
<td>Fewer</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Less-Than-Significant with Mitigation</td>
<td>None</td>
<td>Fewer</td>
<td>Similar</td>
</tr>
<tr>
<td>Transportation and Circulation</td>
<td>Less-Than-Significant with Mitigation and Significant and Unavoidable</td>
<td>None</td>
<td>Fewer</td>
<td>Fewer</td>
</tr>
<tr>
<td>Wildfire</td>
<td>Less-Than-Significant with Mitigation</td>
<td>None</td>
<td>Fewer</td>
<td>Fewer</td>
</tr>
<tr>
<td><strong>Total Fewer:</strong></td>
<td>5</td>
<td>4</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td><strong>Total Similar:</strong></td>
<td>0</td>
<td>1</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

Note: No Impact = “None;” Less than Proposed Project = “Fewer;” and Similar to Proposed Project = “Similar”