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ALTERNATIVES ANALYSIS

18.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; reasonable range of project alternatives and their associated impacts in comparison to the proposed project’s impacts; and the environmentally superior alternative.

18.2 PURPOSE OF ALTERNATIVES

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

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

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

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

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

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

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

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

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

Project Objectives

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

1. Implement the County's General Plan and Dry Creek-West Placer Community Plan, which designate the proposed project area for urban development;
2. Provide a well-designed residential community with neighborhood identity in close proximity to jobs and services in Placer and Sacramento Counties;
3. Create a high-quality neighborhood environment containing a mix of residential, open-space, and recreational land uses;

4. Provide for medium residential densities in areas presently planned for urban growth and development with accessible infrastructure, consistent with current area-wide infrastructure plans and growth policies;
5. Provide for variable lot sizes and increased lot coverage to promote the efficient use of land, energy, and water resources within a residential community;
6. Design a project that minimizes encroachment into the existing 100-year floodplain on the site while balancing the housing needs and densities and the character of the local community;
7. Minimize the potential for land use incompatibilities of existing industrial use designation with adjacent and nearby residential communities;
8. Preserve existing riparian and oak woodland habitat on the project site within a permanent greenbelt area;
9. Reduce growth pressures on outlying areas of Placer County by efficiently utilizing the project site to accommodate residential growth and development;
10. Plan for medium-density residential development in distinct and logically-phased “villages” to take advantage of the proximity of the project site to region-serving arterials, and to better support opportunities for transit;
11. Provide for a cohesive plan of development that maximizes internal connectivity within the project site for pedestrian and bicycle travel;
12. Provide a comprehensively planned project that protects sensitive environmental habitat and resources;
13. Provide a planned infrastructure system with all public facilities and services necessary to meet the needs of development of the project site; and
14. Provide a sufficient number of residential units within the project site to support necessary improvements to local and regional public service facilities.

Significant 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. Significant 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:

Less Than Significant with Mitigation

- ***Aesthetics.*** The EIR determined that because the types of lighting and the specific locations have not yet been determined, implementation of the proposed project could increase the amount of light and glare generated on-site, which could be visible from the surrounding residential development and roadways in the project vicinity. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.
- ***Air Quality.*** The EIR determined that implementation of the proposed project would result in significant impacts in regard to air quality. Construction activities associated with the proposed project would generate oxides of Nitrogen (NO_x) emissions at a level that would

exceed the Placer County Air Pollution Control District (PCAPCD) significance threshold of 82 pounds per day. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a less-than-significant level.

- **Biological Resources.** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, special-status invertebrate species, special-status fish species, special-status amphibians and reptiles, burrowing owl, Swainson's hawk, other special-status birds and birds protected under the Migratory Bird Treaty Act (MBTA), and special-status bats. Given that the proposed project would involve the removal of trees protected by the County's Tree Preservation Ordinance, the project could conflict with local policies and/or ordinances that protect biological resources, including tree resources. Furthermore, the project could result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be less than significant.
- **Cultural Resources.** The EIR determined that implementation of the proposed project could result in disturbance or destruction of unique archaeological and paleontological resources, human remains, and Tribal Cultural Resources, as defined in Public Resources Code, Section 21074. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources, including cumulative impacts, would be less than significant.
- **Geology and Soils/Mineral Resources.** The EIR determined that implementation of the proposed project could result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features. In addition, due to the potential exposure of topsoil on the proposed project site during construction activities, implementation of the proposed project could result in a significant increase in wind or water erosion of soils, either on or off the site, and result in changes in deposition, erosion, or siltation which could modify the channel of downstream water bodies. Furthermore, the proposed project could potentially create substantial risks to life and/or property associated with expansive soils. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.
- **Hazards and Hazardous Materials.** The EIR determined that the proposed project site contains existing wells and septic systems which would require proper abandonment prior to construction of the proposed project. In addition, the proposed project site contains existing structures that are likely to contain asbestos-containing materials and lead-based paints. Furthermore, elevated levels of dieldrin, a type of termiticide, were detected within the vicinity of the single-family residence on the Haight property, and elevated levels of lead were detected on the Ogg property in the vicinity of a former pesticide mixing area. An existing natural gas pipeline is located on the project site, and could potentially be damaged as a result of project construction activities. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- **Hydrology and Water Quality.** The EIR determined that implementation of the proposed project could result in potential construction and operational impacts related to water quality, changes in drainage patterns, and increases in stormwater runoff rates could occur during operation of the proposed project. However, the EIR requires mitigation in order to ensure that impacts related to hydrology and water quality, including cumulative impacts, are reduced to less-than-significant levels.
- **Noise.** The EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Furthermore, potential noise impacts could occur related to the construction of new residences in close proximity to the existing industrial uses to the south of the East Village area. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.
- **Transportation and Circulation.** The EIR determined that implementation of the proposed project would result in a potentially significant impact related to construction traffic. In addition, the project in combination with other cumulative development would have a significant impact to the intersection of PFE Road/Antelope Road. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.
- **Utilities and Service Systems.** The EIR determined that implementation of the proposed project would result in a potentially significant impact related to the construction of new wastewater delivery, collection or treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

Significant and Unavoidable

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

- **Biological Resources.** The EIR determined that the proposed project, in combination with other reasonably foreseeable development within the Dry Creek-West Placer Community Plan area, would result in a significant and unavoidable impact related to cumulative loss of biological habitats, including aquatic resources, oak woodland, and annual grassland.
- **Land Use and Agricultural Resources.** The EIR determined that implementation of the project could convert the 16.5 acres of land designated Unique Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program, to non-agricultural uses. The EIR includes mitigation to permanently protect an amount of Farmland equal to that which would be converted to non-agricultural uses for the proposed project; however, the mitigation would not prevent the direct loss of Unique Farmland on the project site. Purchase of conservation easements would preserve existing Farmland, but would not create new Farmland to replace that lost to project development. Because the

proposed project would convert Unique Farmland to non-agricultural uses, the impact would remain significant and unavoidable.

- **Transportation and Circulation.** Significant and unavoidable traffic impacts were identified for the following study intersections and roadway segment under the Cumulative Plus Project Condition:
 - Cook Riolo Road/Vineyard Road (Intersection #3);
 - PFE Road/Cook Riolo Road (Intersection #7); and
 - PFE Road from Cook Riolo Road to Antelope Road.

Less Than Significant Impacts

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

- **Aesthetics.** The EIR determined that impacts related to scenic vistas, scenic resources within State scenic highways, and degradation of the existing visual character or quality of the project site and/or the site's surroundings would be less than significant.
- **Air Quality.** The EIR determined that impacts related to violating air quality standards or contributing substantially to an existing or projected air quality violation during operations and impacts related to exposure of sensitive receptors to substantial pollutant concentrations and creation of objectionable odors affecting a substantial number of people would be less than significant. Furthermore, cumulative impacts related to generation of operational greenhouse gas (GHG) emissions in excess of the applicable PCAPCD efficiency threshold were determined to be less than significant.
- **Cultural Resources.** The EIR determined that impacts related to historical resources and restriction of existing religious or sacred uses would be less than significant.
- **Geology and Soils/Mineral Resources.** The EIR determined that impacts related to exposure of people or structures to unstable earth conditions or changes in geologic substructures, or exposure of people or property to geologic and geomorphological (i.e. avalanches) hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards would be less than significant. In addition, a less-than-significant impact would occur with regard to mineral resources and unique geologic or physical features.
- **Hazards and Hazardous Materials.** The EIR determined that impacts related to the following issues would be less than significant: creation of a significant hazard to the public or the environment through the routine handling, transport, use, or disposal of hazardous or acutely hazardous materials; emission of hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school; being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; airport related hazards; and hazards related to wildland fires.

- **Hydrology and Water Quality.** The EIR determined that impacts related to flood risks and groundwater would be less-than-significant.
- **Land Use and Agricultural Resources.** The EIR determined that impacts related to the following would be less than significant: physical division of an established community; disruption or division of the physical arrangement of an established community; conflicts with policies regarding land use buffers for agricultural operations; conflicts with DCWPCP land use and zoning designations; development of incompatible uses and/or land use conflicts; substantial alteration of present or planned land uses of an area; economic or social changes such as urban decay or deterioration; and forest land/timberland zoning.
- **Noise.** The EIR determined that impacts related to exposure of persons to or generation of non-transportation noise levels in excess of established standards or generation of excessive groundborne vibration or groundborne noise levels would be less than significant. In addition, a less-than-significant impact would occur with regard to creation of a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- **Population and Housing.** The EIR determined that impacts related to inducement of substantial population growth, displacement of substantial numbers of existing housing or people, and compliance with Placer County's Affordable Housing requirements would be less than significant.
- **Public Services and Recreation.** The EIR determined that impacts related to substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and sheriff protection services, schools, and other government services and facilities would be less than significant. Similarly, a less-than-significant impact would occur with regard to recreational facilities.
- **Transportation and Circulation.** The EIR determined that impacts related to study intersections and roadway segments under Existing Plus Project Conditions would be less-than-significant. In addition, a less-than-significant impact would occur with regard to vehicle safety, emergency access or access to nearby uses, and transit, bicycle, and pedestrian facilities.
- **Utilities and Service Systems.** The EIR determined that impacts related to wastewater treatment, construction of new on-site sewage systems, water supplies, and electricity and natural gas resources would be less than significant.

With the exception of the cumulative impacts discussed above related to air quality, GHG emissions, and transportation and circulation, the cumulative impacts associated with each remaining issue area were determined to be less than significant or less than cumulatively considerable.

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

18.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed 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 environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to “set forth only those alternatives necessary to permit a reasoned choice.” As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

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

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

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

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

Alternatives Considered But Dismissed From Further Analysis

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

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

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

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

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

Off-Site Alternative

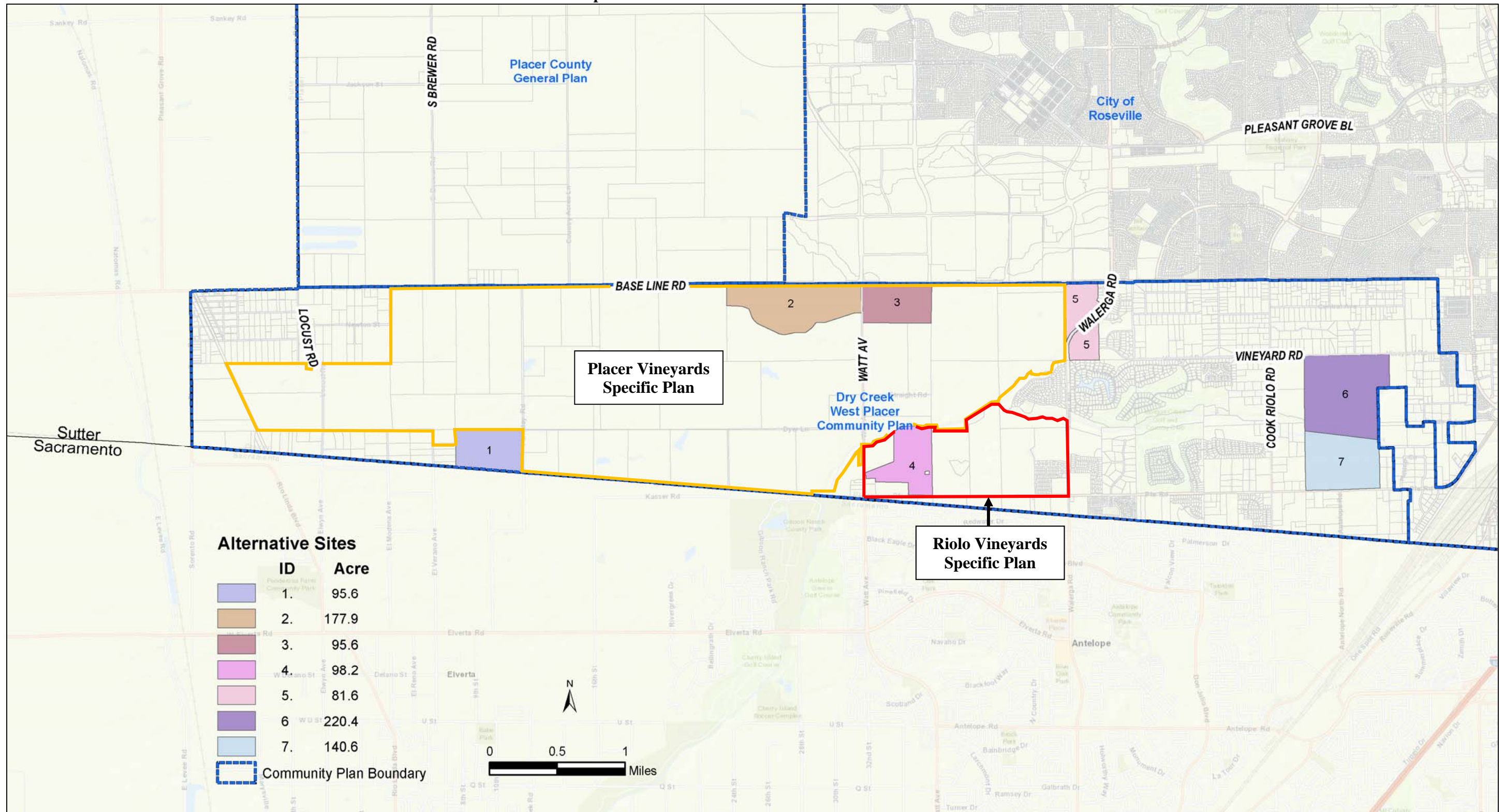
The possibility of an off-site location was considered as an alternative to the project. The County's Geographic Information System (GIS) database was consulted to provide information regarding vacant properties in the DCWPCP with 75 acres or more available for development. The locations of such properties are illustrated in Figure 18-1 below. In considering sites potentially available for future development, the objectives of the proposed project were used to assess the suitability of available sites.

Parcel 1 (95.6 acres) is located outside of a specific plan area and includes sufficient acreage to accommodate a density of single-family units similar to the proposed project. However, access to the project site is limited, as compared to the proposed project. The primary access road, Palladay Road, is a very narrow roadway that transitions to an unmaintained dirt road along the parcel's eastern boundary. In addition, Parcel 1 is made up of agricultural land interspersed with sensitive drainage features. Given that the entire parcel would need to be developed to accommodate a similar number of units as the proposed project, biological and agricultural resources impacts would be expected to increase. Similar to the proposed project site, Parcel 1 is also located in close proximity to existing rural single-family residential development.

As shown in Figure 18-1, Parcels 2 (177.9 acres) and 3 (95.6 acres) are located within the Placer Vineyards Specific Plan area. In 2017, a Small Lot Vesting Tentative Subdivision Map including a total of 225 single-family lots was approved by the County for Parcel 2. A small lot map has not yet been approved for Parcel 3; however, a conceptual lot plan including a mix of medium- and high-density residential units has been prepared for the site. Per the Placer Vineyards Specific Plan EIR, both Parcels 2 and 3 contain extensive seasonal wetland features.¹ As such, impacts related to biological resources associated with construction of a residential subdivision on either site would likely be greater compared to the proposed project.

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

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



Furthermore, development of an off-site alternative within Parcels 2 or 3 would require payment of fees through the Placer Vineyards Specific Plan Fee Program, as well as various other fees imposed on development within the planning area. Such fees could reduce the economic feasibility of the proposed project.

Parcel 4 (98.2 acres), located along the southern boundary of the Riolo Vineyards Specific Plan area, has similar conditions as the Mill Creek project site within respect to agricultural land and on-site biological resources, including but not limited to oak woodlands and drainage features. As a result, development of a residential subdivision on Parcel 4 would not be expected to reduce project impacts to agricultural and biological resources. Furthermore, approximately 20.3 acres of Parcel 4 are designated for agricultural uses per the Riolo Vineyards Specific Plan. Thus, impacts related to conflicts with existing agricultural operations could be greater compared to the proposed project. Similar to Parcels 2 and 3, development of an off-site alternative within Parcel 4 would require payment of development fees as part of the County-administered Riolo Vineyards Specific Plan Fee Program and other fee mechanisms noted in the Public Facilities Financing Plan for the planning area.²

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

Parcels 6 (220.4 acres) and 7 (140.6 acres) are both transected by riparian drainages, which would limit the developable area of the sites. In addition, Dry Creek forms the approximate border between both properties, which would further limit the developable area of the two parcels. Impacts related to biological resources would likely be greater with buildout of the proposed project on Parcel 6 or Parcel 7 than what is anticipated for the proposed project. Furthermore, Parcel 6 is bordered by existing industrial uses to the east and rural residential development to the west. Parcel 7 is currently under a Williamson Act contract and contains extensive agricultural uses. Accordingly, impacts related to incompatible uses would be greater with buildout of the project on Parcel 6 or 7 compared to the proposed project. The Dry Creek Wastewater Treatment Plant is located directly adjacent to the eastern boundary of Parcel 7, which could result in potential impacts related to exposure of future residents to odors.

It is also important to consider that the project site is located in an area served by existing regional infrastructure and arterial roadways, and is located adjacent to existing urban development in Sacramento County, as well as existing and planned urban areas within Placer County. Development of the proposed project at an alternative location within Placer County would be anticipated to require the extension of additional infrastructure and public services compared to the project site, and would not likely represent an efficient use of existing public investments. In addition, an off-site alternative would require an expansion of urban uses into areas within Placer

² Placer County. *Riolo Vineyard Specific Plan Public Facilities Financing Plan*. March 2009.

County that are designated under the General Plan for agricultural use or to areas unsuitable for development compared to the project site due to environmental or habitat constraints.

Overall, off-site alternatives that could accomplish the project objectives or accommodate a similar type and intensity of development as the proposed project are not considered feasible at this time. As a result, the Off-Site Alternative is dismissed from detailed evaluation.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- Buildout per Existing Community Plan Alternative; and
- Reduced Density Alternative.

See Table 18-12 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 would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build,’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.” (*Id.*, subd. [e][3][B]).

The County has decided to evaluate a No Project (No Build) Alternative, which assumes that the proposed project site would remain in its current condition and would not be developed. As described in this EIR, the project site is currently developed with two rural single-family residences, a commercial nursery and wholesale grower (Haight Nursery), and various outbuildings. The remainder of the site consists primarily of open grassland and scattered trees. A riparian corridor lies adjacent to the eastern boundary of the site and parallels two unnamed tributaries to Dry Creek. 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 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

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

Greenhouse Gas Emissions

Short-term and long-term increases in GHG emissions associated with construction and occupation of a residential subdivision would not occur, as would be the case for the proposed project. Long-term criteria pollutant and GHG emissions would be limited to relatively modest emissions associated with ongoing operation of the Haight Nursery. Overall, impacts related to air quality and GHG emissions would be fewer under the No Project (No Build) Alternative.

Biological Resources

Under the No Project (No Build) Alternative land disturbance would be primarily limited to regular disking of the orchard on the Ogg property to reduce wildfire risks. In addition, given that crop production is currently allowed within the Combining Agriculture (-AG) district without any additional approvals or permits, land disturbance associated with such agricultural operations could potentially occur in the future, particularly on the Pruett property. Nonetheless, impacts to potential biological resources associated with construction and long-term occupation of a residential subdivision on the project site would not occur. Therefore, impacts related to biological resources would be fewer under the No Project (No Build) Alternative as compared to the proposed project.

Cultural Resources

Because land disturbance would be limited to disking to reduce fire hazard and potential future agricultural operations under the No Project (No Build) Alternative, impacts to potential disturbance of cultural resources would not occur. For example, mitigation would not be required to avoid disturbance of the prehistoric site (CA-PLA-67) identified within the Placer Green property. While the aforementioned disking and agricultural operations could result in disturbance of on-site soils, given that the project site has been previously subject to extensive agricultural uses, the No Project (No Build) Alternative would be unlikely to unearth new, previously

undiscovered resources. In addition, the No Project (No Build) Alternative would not include potential construction of off-site sewer improvements within the Dry Creek drainage, which is considered highly sensitive for the presence of archaeological sites. Therefore, potential impacts related to cultural resources would be fewer under the No Project (No Build) Alternative as compared to the proposed project.

Geology and Soils/Mineral Resources

As noted above, ground-disturbing activities occurring under the No Project (No Build) Alternative would be primarily limited to disking to reduce fire hazard, as well as potential future crop production. Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial changes in topography or ground surface relief features would be reduced relative to the proposed project. In addition, erosion would not occur as a result of topsoil exposure. Because new structures would not be constructed, the No Project (No Build) Alternative would not create substantial risks to life and/or property associated with expansive soils. Therefore, impacts related to geology, soils, and mineral resources would be fewer under the No Project (No Build) Alternative.

Hazards and Hazardous Materials

Under the No Project (No Build) Alternative, abandonment of the existing on-site wells and septic systems would not be required, and potential impacts related to damaging the on-site natural gas pipeline during construction would not occur. However, residents of the existing on-site single-family residences would continue to be exposed to potential risks associated with asbestos-containing materials and lead-based paints associated with on-site structures, as well as elevated levels of dieldrin and lead within on-site soils around the buildings. Nonetheless, impacts related to hazards and hazardous materials would be fewer under the No Project (No Build) Alternative as compared to the proposed project.

Hydrology and Water Quality

The No Project (No Build) Alternative would not alter the existing drainage pattern of the site or surrounding area and would not create or contribute an increase in runoff water that would exceed existing or planned stormwater drainage system capacity or violate water quality standards. New impervious surfaces would not be introduced to the project site. In addition, contamination of downstream waterways due construction activities would not occur, and mitigation to avoid impacts associated with such would not be required. It should be noted that existing soil contaminants identified within the Haight property would not be remediated and, thus, such contaminants could result in the pollution of stormwater runoff from the project site. Nonetheless, impacts related to hydrology and water quality would be fewer under the No Project (No Build) Alternative as compared to the proposed project.

Land Use and Agricultural Resources

Under the No Project (No Build) Alternative, the existing DCWPCP land use and zoning designations for the project would be retained, and a Community Plan Amendment and rezone would not be required. Because the site would not be developed with new structures, the No Project (No Build) Alternative would not result in the conversion of Farmland to non-agricultural uses, and the loss of Unique Farmland would not occur. Thus, Mitigation Measure 11-4 would not be required, and the significant and unavoidable impact occurring with implementation of the proposed project would be avoided. In addition, Mitigation Measure 11-5 related to the County's Right-to-Farm ordinance would not be required. Overall, impacts related to land use and agricultural resources would be fewer under the No Project (No Build) Alternative as compared to the proposed project.

Noise

The No Project (No Build) Alternative would not introduce any new noise-sensitive receptors to the project site. While increased traffic on local roadways would still occur due to continued growth in the area, unlike the proposed project, the No Project (No Build) Alternative would not introduce residents to the site who could be subjected to traffic noise levels in excess of Placer County standards. In addition, the No Project (No Build) Alternative would not introduce new residents near the existing industrial noise sources in the East Village, and the significant impact identified for the proposed project related to such would be avoided. Thus, mitigation related to the construction of noise barriers and installation of window upgrades would not be required. Furthermore, because the No Project (No Build) Alternative would not involve construction activities, mitigation to reduce construction noise would not be required. Overall, impacts related to noise would not occur under the No Project (No Build) Alternative.

Transportation and Circulation

The No Project (No Build) Alternative would not generate construction traffic on local roadways and, thus, Mitigation Measure 10-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. In addition, given that the only trips generated under this alternative would be related to the commercial nursery and two on-site homes, the significant and unavoidable intersection and roadway segment impacts generated by the proposed project would not occur. Therefore, impacts related to transportation and circulation would not occur under the No Project (No Build) Alternative.

Utilities and Service Systems

The No Project (No Build) Alternative would not require new wastewater service necessitating annexation into Community Service Area (CSA) 28, Zone 173. Rather, the existing single-family residences within the project site would continue to rely on septic systems. Consequently, Mitigation Measure 16-2 related to annexing into the County CSA would not be required. Therefore, impacts related to utilities and service systems would not occur.

Buildout Pursuant to Existing Community Plan Alternative

The Buildout Pursuant to Existing Community Plan Alternative would consist of buildout of the proposed project site per the current DCWPCP land use designations at the maximum allowable density. The current DCWPCP land use designations for the site, along with the allowable development intensity for each area of the site, are shown in Figure 18-2 and summarized in Table 18-1 below. Within the western portion of the project site, the 2.6-acre Open Space/Buffer area could be developed with a public park to serve as an amenity for future residents of the 73 single-family units. This open space buffer is required pursuant to Placer County General Plan land use buffer standards, which require a minimum 100-foot buffer between industrial/residential uses.

Land Use Designation	Acreage	Maximum Allowable Development Intensity ¹
Low Density Residential	36.6	73 units
Commercial	12.7	138,303 sf
Industrial	32.3	632,491 sf
Open Space ²	19.0	--
Streets	9.5	--

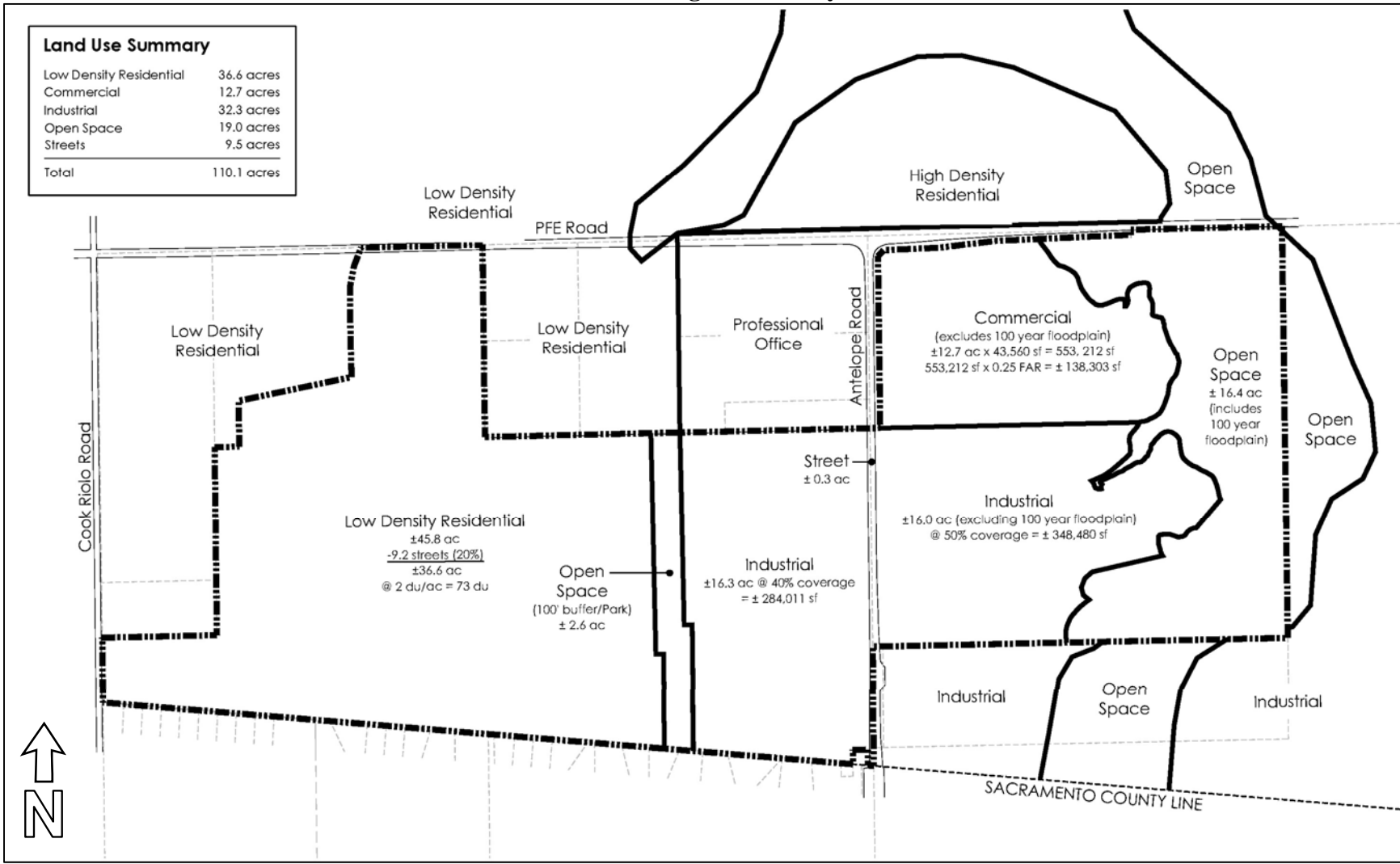
¹ For development assumptions, see notes on Figure 18-1.
² Includes a proposed 2.6-acre park area.

As shown in Table 18-1, this Alternative could result in the development of a low density residential single-family subdivision containing 73 units in the western half of the project site. This equates to 235 fewer units than the proposed project. The on-site areas on both sides of Antelope Road would be developed with up to 632,491 square feet of industrial uses, and the northwestern portion of the Placer Greens property would be developed with an estimated 138,303 square feet of commercial uses. A similar, though reduced, amount of open space would be provided with this Alternative as compared to the proposed project (16.4 acres for the Alternative and 21.8 for proposed project). It should be noted that while the 2.6-acre park area would also ultimately be preserved as open space, most parks still undergo development for grading and amenity installation (play structures, paved paths, etc.).

Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would require roadway improvements to PFE Road and Antelope Road in order to provide access to the developed areas.

Because the Buildout Pursuant to Existing Community Plan Alternative would implement the Placer County General Plan and the DCWPCP, the project objective related to such would be met. Most of the remaining project objectives would be partially met, as the Buildout Pursuant to Existing Community Plan Alternative would include development of 73 single-family residential units on the western portion of the project site. However, development of the eastern portion of the project site with commercial and industrial uses would conflict with current land use trends in the area.

Figure 18-2
Buildout Pursuant to Existing Community Plan Alternative



New industrial development occurring to the west of Antelope Road could result in land use conflicts with the existing residential uses to the north and, thus, Objective #7 would not be met. Furthermore, because the Buildout Pursuant to Existing Community Plan Alternative would include only 73 residential units, rather than the 308 units included in the proposed project, Objective #14 would not be met.

Aesthetics

Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would introduce new sources of light and glare to the project site where few currently exist. For the residential component of the Buildout Pursuant to Existing Community Plan Alternative, such sources would include, but would not be limited to, streetlights within internal street systems, vehicle headlights, exterior lighting fixtures, interior light spilling through windows, and light reflected off of windows. For the industrial and commercial components, additional sources of light would include parking lot light poles and lighting associated with buildings signage.

All on-site lighting would be required to comply with Section 17.54.070(i) of the Placer County Code. In addition, the Buildout Pursuant to Existing Community Plan Alternative would be subject to compliance with the applicable sections of the *Placer County Design Guidelines* related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass onto residential property lines. However, because the types of lighting and the specific locations have not yet been determined for the Buildout Pursuant to Existing Community Plan Alternative, Mitigation Measure 4-1 would still be required. Furthermore, because the Buildout Pursuant to Existing Community Plan Alternative would include commercial and industrial development with lighted parking lots, the potential for new sources of light and glare to affect day or nighttime views in the area would be increased. Overall, impacts related to aesthetics could be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Air Quality

Under the Buildout Pursuant to Existing Community Plan Alternative, approximately 16.4 acres of the project site would be preserved as open space (excluding a proposed 2.6-acre park), whereas under the proposed project, approximately 21.8 acres would be preserved. Due to the slight decrease in open space relative to the proposed project, the area of on-site disturbance would be proportionately increased under the Buildout Pursuant to Existing Community Plan Alternative. Both the Buildout Pursuant to Existing Community Plan Alternative and the proposed project would require demolition of existing on-site buildings and remediation of contaminated soils. As such, impacts related to construction emissions of criteria pollutants would be anticipated to be slightly greater compared to the proposed project.

With regard to operational emissions, the California Emissions Estimator Model (CalEEMod) version 2016.3.2 software was utilized to estimate the Buildout Pursuant to Existing Community Plan Alternative's criteria air pollutant emissions. Land use assumptions were based on the overall acreage and maximum allowable development intensity for each of the existing DCWPCP land use designations within the project site, as summarized in Table 18-1. The CalEEMod results for the operational emissions are presented in Table 18-2 and included in Appendix C to this EIR. As

shown in the table, the unmitigated emissions of criteria air pollutants associated with the Buildout Pursuant to Existing Community Plan Alternative would be considerably greater than the proposed project during operation. The Buildout Pursuant to Existing Community Plan Alternative would result in operational emissions of NO_x above the applicable PCAPCD threshold of significance of 55 pounds per day (lbs/day) and, thus, mitigation would be required to reduce NO_x emissions.

Pollutant	Proposed Project Operational Emissions	Buildout Pursuant to Existing Community Plan Alternative Operational Emissions	PCAPCD Significance Threshold
ROG	20.30	39.60	55
NO _x	38.90	135.68	55
PM ₁₀	15.30	52.12	82

Source: CalEEMod, April 2018.

Overall, given that construction and operational emissions would be greater than the proposed project, impacts related to air quality would be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project. Given that a significant impact related to operational criteria pollutant emissions was not identified for the proposed project, a new significant impact would occur under the Alternative.

Greenhouse Gas Emissions

Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would contribute to increases of GHG emissions that are associated with global climate change during construction and operations. As noted above, the construction of the Buildout Pursuant to Existing Community Plan Alternative would involve a minor increase in the overall disturbance area as the proposed project, and would similarly require demolition of existing on-site buildings and remediation of contaminated soils. Therefore, short-term construction related GHG emissions would be slightly greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

In order to determine whether the GHG emissions occurring under the Buildout Pursuant to Existing Community Plan Alternative would be below the applicable thresholds of significance, thereby eliminating the associated mitigation measure identified for the proposed project, CalEEMod was used to estimate the Buildout Pursuant to Existing Community Plan Alternative operational emissions using the same land use assumptions noted above. The CalEEMod results are presented in Table 18-3, with GHG emissions expressed in terms of metric tons of carbon dioxide (CO₂) equivalents (MTCO_{2e}). As shown in the table, operational GHG emissions associated with the Buildout Pursuant to Existing Community Plan Alternative would be considerably larger compared to the proposed project, primarily as the result of substantial increases in mobile source emissions. Both the proposed project and the Buildout Pursuant to Existing Community Plan Alternative would result in annual emissions in excess of the 1,100 MTCO_{2e}/yr operational threshold of significance.

Table 18-3		
Unmitigated Operational GHG Emissions (MTCO_{2e}/yr): Buildout Pursuant to Existing Community Plan Alternative		
Pollutant	Proposed Project Emissions	Buildout Pursuant to Existing Community Plan Alternative Emissions
Area	3.83	0.92
Energy	884.14	2,402.35
Mobile	3,354.56	11,704.01
Solid Waste	174.38	508.66
Water	70.15	396.28
TOTAL ANNUAL GHG EMISSIONS	4,487.06	15,012.20

Source: CalEEMod, April 2018.

Furthermore, the Buildout Pursuant to Existing Community Plan Alternative would exceed the PCAPCD’s “bright-line” threshold of 10,000 MTCO_{2e}/yr. Therefore, the PCAPCD’s efficiency thresholds would not apply, and mitigation would be required to reduce GHG emissions below the bright-line threshold. It may be the case that the GHG impact for the Alternative could remain significant and unavoidable if the level of mitigation needed to reduce the emissions below the bright-line threshold were to prove economically infeasible for the developer.

Conclusion

Based on the above, impacts related to air quality would be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project. In addition, greater overall annual GHG emissions would occur during operation, and the PCAPCD’s 10,000 MTCO_{2e}/yr bright-line threshold could be exceeded. Overall, potential impacts related to air quality and GHG emissions would be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Biological Resources

Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would preserve the existing oak woodland area on the eastern portion of the project site as open space. However, this alternative would slightly decrease the amount of open space along the eastern boundary from 16.8 (proposed project) to 16.4 (Alternative). In addition, the overall amount of open space would be reduced from 21.8 acres (proposed project) to 19 acres (Alternative). Given that the Buildout Pursuant to Existing Community Plan Alternative would preserve a smaller amount of area as open space compared to the proposed project, overall impacts to special-status species, aquatic resources, and other biological resources could be greater.

Cultural Resources

As noted above, the Buildout Pursuant to Existing Community Plan Alternative would result in a slightly larger overall disturbance area relative to the proposed project. Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would result in off-site disturbance as a result of roadway and sewer improvements necessary to accommodate new

development. Consequently, the potential for the Buildout Pursuant to Existing Community Plan Alternative to result in disturbance or destruction of unique archaeological and paleontological resources, human remains, and Tribal Cultural Resources would be increased. Mitigation related to such would continue to be required. Overall, potential impacts related to cultural resources would be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Geology and Soils/Mineral Resources

As noted above, the Buildout Pursuant to Existing Community Plan Alternative would include a slightly larger overall area of disturbance compared to the proposed project. Consequently, the potential for development to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would be increased. In addition, a greater amount of development would be subject to risks associated with expansive soils. Because a slightly greater amount of topsoil would be disturbed during construction activities, impacts related to wind and/or water erosion of soils would be proportionately greater under the Buildout Pursuant to Existing Community Plan Alternative. The Buildout Pursuant to Existing Community Plan Alternative would require the same mitigation measures as the proposed project to reduce potential impacts to less-than-significant levels. Overall, potential impacts related to geology, soils, and mineral resources would be slightly greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, Buildout Pursuant to Existing Community Plan Alternative would require abandonment of existing on-site wells and septic systems and remediation of soil contamination issues. In addition, construction activities would result in potential risks associated with the existing on-site natural gas pipeline. All mitigation measures identified in this EIR related to hazards and hazardous materials would still be required, and impacts related to the aforementioned site hazards would be similar to the proposed project.

However, unlike the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would involve operation of industrial uses. Such uses have a greater potential to result in accident conditions involving releases of hazardous materials into the environment. Therefore, impacts related to hazards and hazardous materials could be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Hydrology and Water Quality

Because a slightly greater amount of land disturbance would occur during construction, construction activities associated with the Buildout Pursuant to Existing Community Plan Alternative would result in greater impacts related to short-term construction-related water quality. Because a larger overall portion of the site would be developed with impervious surfaces, impacts related to violating federal, State, or County potable water quality standards, creating or contributing runoff water which would include substantial additional sources of polluted water, or

otherwise substantially degrading surface or groundwater quality during operations would be slightly increased. Similarly, the increase in impervious surfaces would result in greater potential impacts related to substantially altering the drainage pattern of the site or area, or increasing the rate or amount of surface runoff. Mitigation measures would continue to be required in order to reduce the aforementioned impacts to less-than-significant levels. Overall, impacts related to hydrology and water quality would be greater under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Land Use and Agricultural Resources

Similar to the proposed project, the Buildout Pursuant to Existing Community Plan Alternative would result in the conversion of 16.5 acres of land designated Unique Farmland, as shown on the maps prepared pursuant to the FMMP, to non-agricultural uses. Mitigation related to such would be required; however, the impact would remain significant and unavoidable. In addition, similar to the proposed project the Buildout Pursuant to Existing Community Plan Alternative would include development of residential uses on the Ogg property. Currently, limited agricultural operations occur on the land adjacent to the northern boundary of the Ogg property. Therefore, the Buildout Pursuant to Existing Community Plan Alternative would be subject to the County's Right-to-Farm Ordinance, which requires that prospective buyers of property within unincorporated Placer County are notified of the Ordinance and nearby agricultural uses, and that buyers sign a disclosure statement. Proposed project Mitigation Measure 11-5 related to compliance with the Right-to-Farm Ordinance would still be required.

As discussed in Chapter 11, Land Use and Agricultural Resources, of the EIR, the Placer County General Plan establishes buffer zone requirements for residential development located adjacent to industrial land uses.³ The current minimum buffer width required for juxtaposed industrial/residential uses is 100 feet where the buffer includes such features as screening walls, landscaped berms, and/or dense landscaping, with guarantees of proper, ongoing landscaping maintenance. Within the project site, the residential and industrial uses proposed for the Buildout Pursuant to Existing Community Plan Alternative would be separated from each other by a 100-foot open space buffer (see Figure 18-2). Under the Alternative, the industrial/residential interface at the southern boundary of the Placer Greens property would be eliminated. Rather, the Alternative would locate new industrial uses adjacent to the existing industrial uses such that compatibility issues would not occur. Overall, impacts related to land use and agricultural resources would be similar under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Noise

The Buildout Pursuant to Existing Community Plan Alternative would involve development of a smaller number of single-family residences relative to the proposed project, and such development would be limited to the western portion of the project site. Residences would not be constructed adjacent to Antelope Road. Therefore, impacts related to the exposure of new noise sensitive

³ Placer County. *Countywide General Plan Policy Document, Part 1, Land Use/Circulation Diagrams and Standards* [pg. 19]. August 1994 (updated May 2013).

residential uses to traffic noise would be reduced under the Buildout Pursuant to Existing Community Plan Alternative. However, because the Buildout Pursuant to Existing Community Plan Alternative would still involve development of new residences adjacent to PFE Road, mitigation to require construction of noise barriers at such residential lots would be required.

As discussed in greater detail below, the Buildout Pursuant to Existing Community Plan Alternative would increase average daily trips (ADT) associated with the site by approximately 275 percent relative to the proposed project, which would substantially increase operational traffic noise along roadway segments in the project area. Therefore, impacts related to substantial permanent increases in ambient noise levels in the project vicinity above levels existing without the project would be greater compared to the proposed project. While it cannot be known with any definitiveness unless quantitative analysis was conducted, the possibility exists that the increase in traffic noise levels on surrounding roadways would be of sufficient magnitude along certain segments to trigger the FICON thresholds set forth in Table 12-7.

Under the Buildout Pursuant to Existing Community Plan Alternative, a 10-foot sound wall would not be required along the southern boundary of the East Village, as residential development would not be placed adjacent to the existing industrial uses south of the project site. As such, an exception to the Placer County exterior noise level standard, subject to review and approval by the Placer County Board of Supervisors, would not need to be included as an entitlement for the project under the Alternative.

With regard to construction noise, the overall intensity of development occurring under the Buildout Pursuant to Existing Community Plan Alternative would be relatively similar to the proposed project. As such, impacts related to creation of a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project would be similar.

Overall, noise impacts would be similar under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Transportation and Circulation

Based on the Traffic Impact Analysis prepared for the proposed project by KD Anderson & Associates, Inc. (see Appendix M),⁴ the Buildout Pursuant to Existing Community Plan Alternative would result in approximately 11,009 ADT as compared to 2,932 ADT occurring with development of the proposed project (see Table 18-4 and Table 18-5). Because greater vehicle trips would be generated by the Buildout Pursuant to Existing Community Plan Alternative, the intensity of traffic-related impacts would be increased compared to the proposed project. As such, the project's cumulative impacts related to study intersections and study roadway segments would remain significant and unavoidable. While it cannot be known with any definitiveness unless quantitative analysis was conducted, the possibility exists that the substantial increase in traffic levels on surrounding roadways, as compared to the proposed project, would be of sufficient

⁴ KD Anderson & Associates, Inc. *Traffic Impact Analysis for Mill Creek Subdivision, Placer County, California*. January 17, 2018.

magnitude along certain segments, and at certain intersections, to generate new significant traffic impacts that would not occur with the proposed project.

Table 18-4 Buildout Pursuant to Existing Community Plan Alternative Trip Generation									
Land Use (ITE Code)	Unit Quantity	Size	Trips Per Unit						
			ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Low Density Residential (LU 210)	Unit	73	695	14	41	55	46	27	73
Commercial (LU 820)	ksf	138.3	5,905	82	51	133	246	267	513
Industrial (LU 110)	ksf	632.5	4,409	512	72	582	74	540	614
Total:			11,009	608	164	770	366	834	1,200

Note: ksf = 1,000 square feet

Source: KD Anderson & Associates, Inc., 2018.

Table 18-5 Proposed Project vs. Buildout Pursuant to Existing Community Plan Alternative Average Weekday Trip Generation		
Duration	Proposed Project Trips	Buildout Pursuant to Existing Community Plan Alternative Trips
Daily	2,932	11,009
AM Peak Hour	231	770
PM Peak Hour	308	1,200

Source: KD Anderson & Associates, Inc., 2018.

It should be noted that the Buildout Pursuant to Existing Community Plan Alternative would also require mitigation measures, such as preparation of a construction traffic management plan for construction traffic impacts. Overall, development of the Buildout Pursuant to Existing Community Plan Alternative would result in greater impacts related to transportation and circulation compared to the proposed project.

Utilities and Service Systems

Because the Buildout Pursuant to Existing Community Plan Alternative would include development of the site with residential, commercial, and industrial uses, new wastewater service would be required to accommodate increases in demand created by such uses. Consequently, Mitigation Measure 16-2 would continue to be required in order to ensure annexation into Community Service Area 28, Zone 173 for ongoing maintenance and operation of the new wastewater infrastructure. Overall, impacts related to utilities and service systems would be similar under the Buildout Pursuant to Existing Community Plan Alternative compared to the proposed project.

Reduced Density Alternative

The Reduced Density Alternative would consist of buildout of the proposed project site per the densities shown in Figure 18-3 and Table 18-6 below. At 212 single-family units, the Alternative would have 96 fewer units than the proposed project and lot sizes consistent with the lot sizes proposed for the West Village (typically 80 feet by 125 feet or 65 feet by 115 feet). The proposed Community Plan land use designation across the project site would be Medium Density Residential (2-4 du/ac) in order to accommodate the proposed densities. Thus, a Community Plan map amendment and rezone would be required for this alternative, similar to the proposed project.

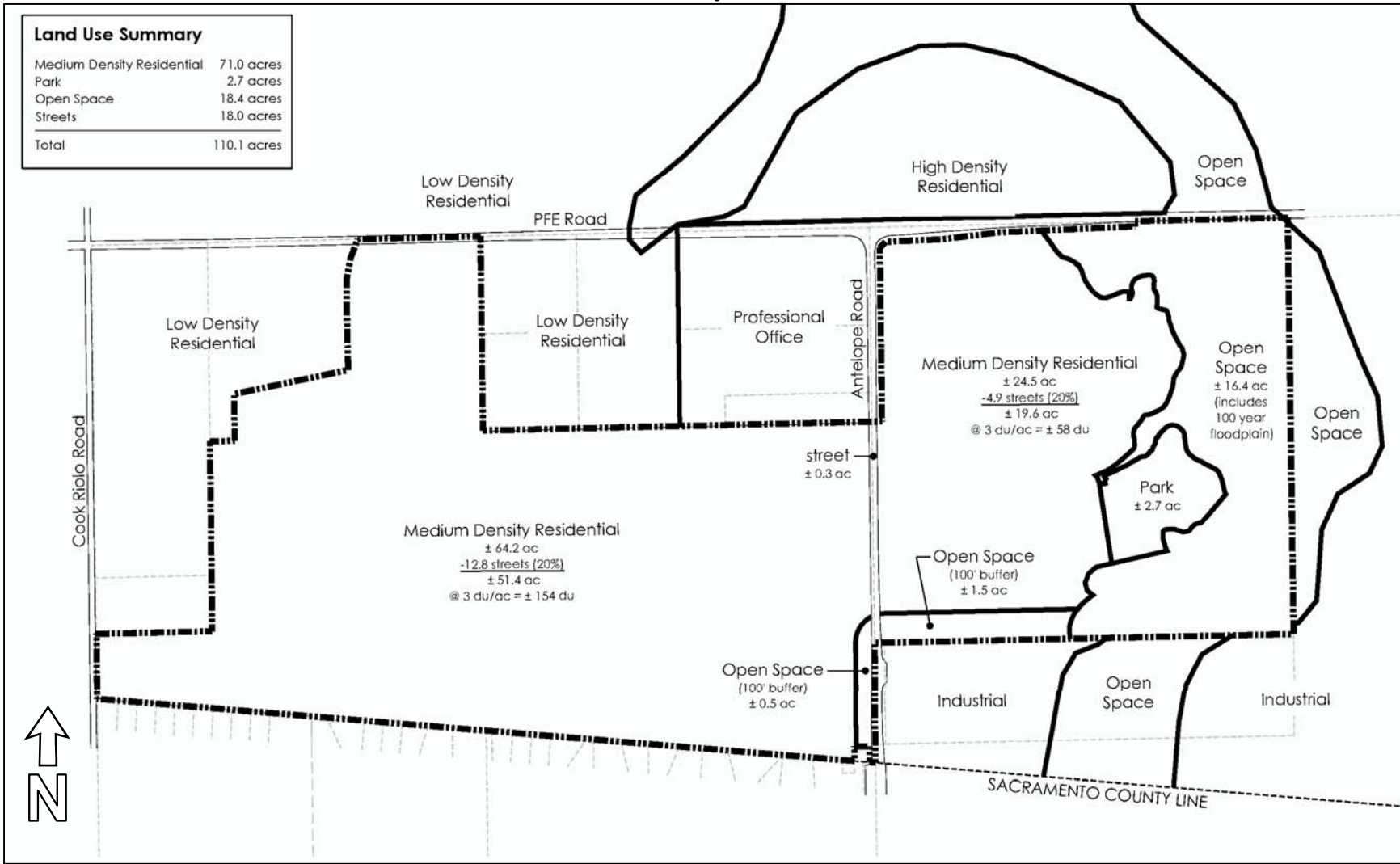
Table 18-6 Reduced Density Alternative		
Land Use Designation	Acreage (net)	Maximum Allowable Development Intensity*
Low Density Residential	71.0	212 units
Park	2.7	--
Open Space	18.4	--
Streets	18.0	--
* For development assumptions, see notes on Figure 18-2.		

As shown in Table 18-1, the Reduced Density Alternative could result in the development of a single-family residential subdivision on the proposed project site. A slightly reduced amount of open space would be preserved under the Reduced Density Alternative as compared to the proposed project (18.4 for the Alternative and 21.8 for the proposed project).

The Reduced Density Alternative would require roadway improvements to PFE Road and Antelope Road in order to accommodate increased traffic volumes and provide access to the developed areas of the site. In addition, the Reduced Density Alternative would include off-site storm drainage and sewer improvements similar to the improvements considered for the proposed project. Per Section 17.14.010 of the Placer County Code, the Reduced Density Alternative would require a Conditional Use Permit to construct park uses within an Open Space (O) zoning district.

As shown in Figure 18-3, a 100-foot open space buffer would be provided to the north and west of the existing industrial land use located south of the project site along Antelope Road, consistent with the Placer County General Plan buffer standards for industrial/residential interfaces. In addition, the Reduced Density Alternative would retain the eastern portion of the project site as open space. Thus, the Reduced Density Alternative would meet Project Objectives #7 and #8. The Reduced Density Alternative would generally meet most of the remaining project objectives; however, because the residential portions of the site would not be developed in phased “villages”, the Reduced Density Alternative would only partially meet Objective #10. In addition, because a fewer number of residential units would be constructed, the Objective #14 would be only partly met.

Figure 18-3
Reduced Density Alternative



Aesthetics

Similar to the proposed project, residential development associated with the Reduced Density Alternative would introduce new sources of light and glare to the project site where few currently exist. All on-site lighting would be required to comply with Section 17.54.070(i) of the Placer County Code. In addition, the Reduced Density Alternative would be subject to compliance with the applicable sections of the *Placer County Design Guidelines* related to light pollution, including, but not limited to, shielding of fixtures such that direct rays do not pass onto adjacent residential property lines. However, because the types of lighting and the specific locations have not yet been determined for the Reduced Density Alternative, Mitigation Measure 4-1 would still be required. Nonetheless, given that the overall intensity of development would be reduced, overall, impacts related to aesthetics could be fewer under the Reduced Density Alternative compared to the proposed project.

Air Quality

Under the Reduced Density Alternative, a similar, though reduced amount of area would be preserved as open space compared to the proposed project and, thus, a slight increase in the overall area of on-site disturbance would occur relative to the proposed project. Both the Reduced Density Alternative and the proposed project would require demolition of existing on-site buildings and remediation of contaminated soils. As such, construction emissions of criteria pollutants would be slightly increased compared to the proposed project.

With regard to operational emissions, CalEEMod version 2016.3.2 software was utilized to estimate the Reduced Density Alternative’s criteria air pollutant emissions. Land use assumptions were based on the acreages and unit counts shown in Table 18-6. The CalEEMod results for the construction-related emissions are presented in Table 18-7. As shown in the table, the unmitigated operational emissions of criteria air pollutants associated with the Reduced Density Alternative would be slightly less than the proposed project for ROG and NO_x; however, PM₁₀ emissions would be slightly increased. All criteria pollutant emissions would be below the applicable PCAPCD thresholds of significance.

Pollutant	Proposed Project Operational Emissions	Reduced Density Alternative Operational Emissions	PCAPCD Significance Threshold
ROG	20.30	14.23	55
NO _x	38.90	29.46	55
PM ₁₀	15.30	12.73	82

Source: CalEEMod, April 2018.

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

Greenhouse Gas Emissions

Similar to the proposed project, the Reduced Density Alternative would contribute to increases of GHG emissions that are associated with global climate change during construction and operations. As noted above, the construction of the Reduced Density Alternative would involve a slight increase in the overall disturbance area compared to the proposed project, and would require demolition of existing on-site buildings and remediation of contaminated soils. Therefore, a minor increase in short-term construction related GHG emissions would occur under the Reduced Density Alternative compared to the proposed project. The proposed project’s long-term operational GHG emissions are presented below.

In order to determine whether the GHG emissions occurring under the Reduced Density Alternative would be below the applicable thresholds of significance, thereby eliminating the associated mitigation measure identified for the proposed project, CalEEMod version 2016.3.2 was used to estimate the Reduced Density Alternative operational emissions using the same land use assumptions noted above. The CalEEMod results are presented in Table 18-8. As shown in the table, while operational GHG emissions would be reduced relative to the proposed project, the Reduced Density Alternative would result in emissions exceeding the 1,100 MTCO_{2e}/yr operational threshold of significance. As discussed in Chapter 17, Cumulative and Other CEQA Sections, of this EIR, projects exceeding the 1,100 MTCO_{2e}/yr operational threshold must further be evaluated in comparison with the PCAPCD’s efficiency thresholds.

Table 18-8 Unmitigated Operational GHG Emissions (MTCO_{2e}/yr): Reduced Density Alternative		
Pollutant	Proposed Project Emissions	Reduced Density Alt. Emissions
Area	3.83	2.63
Energy	884.14	639.45
Mobile	3,354.56	2,742.33
Solid Waste	174.38	119.42
Water	70.15	41.28
TOTAL ANNUAL GHG EMISSIONS	4,487.06	3,545.12

Source: CalEEMod, April 2018.

The County has determined that it is appropriate to compare the GHG emissions from the proposed project to the urban efficiency threshold rather than the rural threshold based on surrounding development in the project site vicinity. The Reduced Density Alternative’s estimated per capita emissions are presented below in Table 18-9 and compared with emissions associated buildout of the proposed project and the applicable PCAPCD efficiency threshold for urban projects.

Table 18-9 Unmitigated Operational GHG Emissions Per Capita (MTCO_{2e}/yr/capita): Reduced Density Alternative		
Proposed Project Emissions	Reduced Density Alternative Emissions	PCAPCD Efficiency Threshold for Urban Residential Projects
4.68	5.38	4.5
Note: Proposed project population = 958; Reduced Density Alternative population = 659 persons.		
<i>Source: CalEEMod, April 2018.</i>		

Per Table 18-9, per capita GHG emissions associated with the Reduced Density Alternative would be greater compared to the proposed project. Such is due, in part, to the decreased efficiency associated with lower densities of residential development. In addition, modeling conducted for the proposed project was also adjusted to reflect project-specific vehicle miles travelled (VMT) provided by KD Anderson & Associates, Inc., as well as the inclusion of wiring for electric vehicle charging stations within each lot, which would support increased use of electric vehicles by future residents. Such project-specific information was not available for the Reduced Density Alternative.

Given that the Reduced Density Alternative would result in operational GHG emissions in excess of the applicable PCAPCD efficiency threshold, similar to the proposed project, mitigation would be required in order to reduce operational generation of GHG emissions.

Conclusion

Based on the above, impacts related to air quality would be fewer under the Reduced Density Alternative compared to the proposed project. In addition, fewer overall annual GHG emissions would occur during operation. While the Reduced Density Alternative’s per capita GHG emissions would be higher compared to the proposed project, mass emissions would be lower, and overall, potential impacts related to air quality and GHG emissions would be fewer under the Reduced Density Alternative compared to the proposed project.

Biological Resources

Similar to the proposed project, the Reduced Density Alternative would preserve the existing oak woodland on the eastern portion of the project site as open space. However, this alternative would slightly decrease the amount of open space along the eastern boundary from 16.8 (proposed project) to 16.4 (Alternative). In addition, the overall amount of open space would be reduced from 21.8 acres (proposed project) to 18.4 acres (Alternative). Given that the Reduced Density Alternative would preserve a smaller amount of area as open space compared to the proposed project, overall impacts to special-status species, aquatic resources, and other biological resources could be greater.

Cultural Resources

The Reduced Density Alternative would result in a similar overall disturbance area relative to the proposed project. Similar to the proposed project, the Reduced Density Alternative would result

in off-site disturbance as a result of roadway, storm drainage, and sewer improvements necessary to accommodate new development. Consequently, the potential for the Reduced Density Alternative to result in disturbance or destruction of unique archaeological and paleontological resources, human remains, and Tribal Cultural Resources would be similar. Mitigation related to such would continue to be required. Overall, potential impacts related to cultural resources would be similar under the Reduced Density Alternative compared to the proposed project.

Geology and Soils/Mineral Resources

Given that the Reduced Density Alternative would result in a similar disturbance area as the proposed project, the potential for development to result in significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would be similar, and a similar amount of development would be subject to risks associated with expansive soils. The Reduced Density Alternative would require the same mitigation measures as the proposed project to reduce potential impacts to less-than-significant levels. Overall, potential impacts related to geology, soils, and mineral resources would be similar under the Reduced Density Alternative compared to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, the Reduced Density Alternative would require abandonment of existing on-site wells and septic systems and remediation of soil contamination issues. In addition, construction activities would result in potential risks associated with the existing on-site natural gas pipeline. All mitigation measures identified in this EIR related to hazards and hazardous materials would still be required, and impacts related to the aforementioned site hazards would be similar to the proposed project. Overall, impacts related to hazards and hazardous materials would be similar under the Reduced Density Alternative compared to the proposed project.

Hydrology and Water Quality

Because a similar amount of land disturbance would occur during construction, construction activities associated with the Reduced Density Alternative would result in similar impacts related to short-term construction-related water quality. However, because fewer single-family residences would be developed, a smaller overall portion of the site would be developed with impervious surfaces. Thus, impacts related to violating federal, State, or County potable water quality standards, creating or contributing runoff water which would include substantial additional sources of polluted water, or otherwise substantially degrading surface or groundwater quality during operations could be slightly decreased. Similarly, impacts related to substantially altering the drainage pattern of the site or area or increasing the rate or amount of surface runoff could be reduced. Nonetheless, mitigation measures would continue to be required in order to reduce the aforementioned impacts to less-than-significant levels. Overall, impacts related to hydrology and water quality could be slightly fewer under the Reduced Density Alternative compared to the proposed project.

Land Use and Agricultural Resources

Similar to the proposed project, the Reduced Density Alternative would result in the conversion of 16.5 acres of land designated Unique Farmland, as shown on the maps prepared pursuant to the FMMP, to non-agricultural uses. Mitigation related to such would be required; however, as with the project, the impact would remain significant and unavoidable. In addition, because residential uses would be developed on both the Ogg and Placer Greens properties, the Reduced Density Alternative would require that prospective buyers of property be notified of the County's Right-to-Farm Ordinance and nearby agricultural uses, and that buyers sign a disclosure statement. Mitigation Measure 11-5 related to compliance with the Right-to-Farm Ordinance would still be required.

As noted previously, the Placer County General Plan establishes buffer zone requirements for residential development located adjacent to industrial land uses.⁵ As shown in Figure 18-3, a 100-foot open space buffer would be provided to the north and west of the existing industrial land use located south of the project site along Antelope Road. In addition, the Reduced Density Alternative would retain the eastern portion of the project site as open space. Thus, unlike the proposed project, inconsistency with the General Plan's minimum buffer standard for industrial/residential interfaces would not occur under the Alternative. Given that the Reduced Density Alternative would include more open space buffers at the southeast portion of the site compared to the proposed project, impacts related to buffers would be reduced.

Overall, impacts related to land use and agricultural resources would be fewer under the Reduced Density Alternative compared to the proposed project.

Noise

Similar to the proposed project, the Reduced Density Alternative would involve development of single-family residential uses adjacent to PFE Road and Antelope Road. As such, the Alternative could still subject future residents to noise levels in excess of the County's applicable noise level standards, similar to the proposed project, and mitigation to require construction of noise barriers at residential lots along PFE Road and Antelope Road would still be required. With regard to construction noise, the overall intensity of development occurring under the Reduced Density Alternative would be slightly reduced compared to the proposed project, as fewer residential units would be constructed, though mitigation would still be required to prevent noise disturbance during construction.

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

⁵ Placer County. *Countywide General Plan Policy Document, Part 1, Land Use/Circulation Diagrams and Standards* [pg. 19]. August 1994 (updated May 2013).

Transportation and Circulation

Based on trip generation rates used for single-family residences in the Traffic Impact Analysis prepared for the proposed project by KD Anderson & Associates, Inc. (see Appendix M),⁶ the Reduce Density Alternative would result in approximately 2,018 ADT as compared to 2,932 ADT that would occur with development of the proposed project (see Table 18-10 and Table 18-11).

Table 18-10									
Reduced Density Alternative Trip Generation									
Land Use (ITE Code)	Unit Quantity	Size	ADT	Trips Per Unit					
				AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Low Density Residential (LU 210)	Unit	212	2,018	40	119	159	134	78	212

Source: KD Anderson & Associates, Inc., 2018.

Table 18-11		
Proposed Project vs. Reduced Density Alternative Average Weekday Trip Generation		
Duration	Proposed Project Trips	Reduced Density Alternative Trips
Daily	2,932	2,018
AM Peak Hour	231	159
PM Peak Hour	308	212

Source: KD Anderson & Associates, Inc., 2018.

Because fewer vehicle trips would be generated by the Reduced Density Alternative, the intensity of traffic-related impacts would be decreased compared to the proposed project. The reduction in dwelling units and associated trips would be sufficient to avoid a significant cumulative impact at the intersection of PFE Road/Antelope Road which would occur under the proposed project scenario, and associated mitigation would not be required. In addition, the significant and unavoidable cumulative roadway segment impact along PFE Road from Cook Riolo Road to Antelope Road would be avoided.

Mitigation would continue to be required related to preparation of a construction traffic management plan for construction traffic impacts. Furthermore, similar to the proposed project, cumulative impacts to the Cook Riolo Road/Vineyard Road and PFE Road/Cook Riolo Road study intersections would remain significant and unavoidable. Overall, development of the Reduced Density Alternative would result in fewer impacts related to transportation and circulation compared to the proposed project.

Utilities and Service Systems

Because the Reduced Density Alternative would include development of the project site with a residential subdivision, wastewater service would be required to accommodate increases in demand created by such uses. Consequently, Mitigation Measure 16-2 would continue to be required in order to ensure annexation into Community Service Area 28, Zone 173 for ongoing

⁶ KD Anderson & Associates, Inc. *Traffic Impact Analysis for Mill Creek Subdivision, Placer County, California.* January 17, 2018.

maintenance and operation of the new wastewater infrastructure. However, because a smaller number of residences would be developed under the Reduced Density Alternative, associated demand on utilities would be lessened.

Overall, impacts related to utilities and service systems would be fewer under the Reduced Density Alternative compared to the proposed project.

18.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, many of the impacts resulting from the proposed project would not occur under the Alternative, as shown in Table 18-12 below.

As discussed throughout this chapter and shown in Table 18-12, the Buildout Pursuant to Existing Community Plan Alternative would result in greater or similar impacts compared to the proposed project for all of the issue areas evaluated. Consequently, neither the No Project (No Build) Alternative nor the Buildout Pursuant to Existing Community Plan Alternative can be selected as the environmentally superior alternative. Therefore, the Reduced Density Alternative becomes the environmentally superior alternative for the proposed project.

The development of the Reduced Density Alternative would partially satisfy the project objectives and would result in reduced impacts compared to the proposed project in eight resource areas. The cumulative significant and unavoidable roadway segment impact along PFE Road from Cook Riolo Road to Antelope Road would be avoided and the cumulative impact identified for the proposed project related to the PFE Road/Antelope Road study intersection would be reduced to a less-than-significant level, thereby eliminating the need for the associated mitigation measure. However, similar to the proposed project, cumulative impacts to the Cook Riolo Road/Vineyard Road and PFE Road/Cook Riolo Road study intersections would remain significant and unavoidable. In addition, because the 16.5 acres of on-site land designated Unique Farmland would still be converted to non-agricultural uses, the associated impact would remain significant and unavoidable.

Table 18-13 below provides a summary of how each of the alternatives considered in this chapter would or would not meet the project objectives. As shown in the table, the Reduced Density Alternative would meet most of the project objectives.

**Table 18-12
Comparison of Environmental Impacts for Project Alternatives**

Resource Area	Proposed Project	No Project (No Build) Alternative	Buildout Pursuant to Existing Community Plan Alternative	Reduced Density Alternative
Aesthetics	Less-Than-Significant with Mitigation	None	Greater	Fewer
Air Quality	Less-Than-Significant with Mitigation	Fewer	Greater	Fewer
Biological Resources	Less-Than-Significant with Mitigation	Fewer	Greater	Greater
Cultural Resources	Less-Than-Significant with Mitigation	Fewer	Greater	Similar
Geology and Soils/Mineral Resources	Less-Than-Significant with Mitigation	Fewer	Greater	Similar
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	Fewer	Greater	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	Fewer	Greater	Fewer
Land Use and Agricultural Resources	Significant and Unavoidable	Fewer	Similar*	Fewer*
Noise	Less-Than-Significant with Mitigation	None	Similar	Fewer
Transportation and Circulation	Significant and Unavoidable	None	Greater*	Fewer*
Utilities and Service Systems	Less-Than-Significant with Mitigation	None	Similar	Fewer
Total Fewer:		11	0	6
Total Similar:		0	3	3
Total Greater:		0	8	1
Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."				
* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.				

Table 18-13			
Project Objective Alternatives Analysis			
Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Community Plan Alternative	Reduced Density Alternative
1. Implement the County’s General Plan and Dry Creek-West Placer Community Plan, which designate the proposed project area for urban development.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. The Alternative would consist of buildout of the project site per the current DCWPCP land use designations at the maximum allowable density.	Meets. The Alternative would develop the project site with single-family residential uses.
2. Provide a well-designed residential community with neighborhood identity in close proximity to jobs and services in Placer and Sacramento Counties.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. The Alternative would provide for residential uses, as well as primary wage earner jobs in the form of commercial and industrial development.	Meets. The Alternative would provide for single-family residential uses with convenient access to jobs and services within the surrounding region.
3. Create a high-quality neighborhood environment containing a mix of residential, open-space, and recreational land uses.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. While the Alternative would provide for a residential community with recreational land uses, residents would not have convenient access to the open space area associated with the Dry Creek tributaries along the eastern site boundary.	Meets. Similar to the proposed project, the Alternative would provide for residential development and recreational land uses in the form of private parks. Residents would have convenient access to open space areas associated with the Dry Creek tributaries along the eastern site boundary.
4. Provide for medium residential densities in areas presently planned for urban growth and development with accessible infrastructure, consistent with current area-wide infrastructure plans and growth policies.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Does not meet. The Alternative would not include medium-density residential development.	Partially meets. The Alternative would provide for medium-density residential development; however, due to the reduced number of residential units, adequate funding may not be available

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Table 18-13			
Project Objective Alternatives Analysis			
Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Community Plan Alternative	Reduced Density Alternative
			to fund necessary infrastructure improvements.
5. Provide for variable lot sizes and increased lot coverage to promote the efficient use of land, energy, and water resources within a residential community.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. Because the residential component of the Alternative would be confined to approximately 45.8 acres and limited to low-density uses, the variability of lot sizes would be reduced compared to the proposed project.	Partially meets. While the Alternative would provide for variable residential lot sizes, overall, the reduced density of development would result in a less efficient use of resources compared to the proposed project.
6. Design a project that minimizes encroachment into the existing 100-year floodplain on the site while balancing the housing needs and densities and the character of the local community.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. The Alternative would retain the eastern portion of the project site as open space, thereby limiting encroachment into the 100-year floodplain associated with the Dry Creek tributaries. However, the industrial and commercial development included in the Alternative could conflict with current land use trends in the project area.	Partially meets. The Alternative would retain the eastern portion of the project site as open space, thereby limiting encroachment into the 100-year floodplain associated with the Dry Creek tributaries. However, the reduced development density may not be adequate to meet housing needs within the DCWPCP area and the surrounding region.
7. Minimize the potential for land use incompatibilities of existing industrial use designation with adjacent and nearby residential communities.	Meets. On-site areas adjacent to existing industrial uses would remain vacant and undeveloped.	Does not meet. New industrial development occurring to the west of Antelope Road could result in land use conflicts with the existing residential uses to the	Meets. A 100-foot open space buffer would be provided to the north and west of the existing industrial land use located south of the project site along Antelope Road,

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Table 18-13 Project Objective Alternatives Analysis			
Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Community Plan Alternative	Reduced Density Alternative
		north.	consistent with the Placer County General Plan buffer standards for industrial/residential interfaces. In addition, the Reduced Density Alternative would retain the eastern portion of the project site as open space.
8. Preserve existing riparian and oak woodland habitat on the project site within a permanent greenbelt area.	Partially Meets. The on-site riparian and oak woodland habitat would remain on-site. However, unlike the proposed project, the open space along the project site’s eastern boundary would not be permanently preserved by conservation easement or similar mechanism.	Meets. Both Alternatives would preserve the riparian habitat associated with the Dry Creek tributaries as open space via conservation easement or similar mechanism.	
9. Reduce growth pressures on outlying areas of Placer County by efficiently utilizing the project site to accommodate residential growth and development.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. The alternatives would reduce growth pressures on outlying areas of Placer County by providing new housing; however, the reduced amount of proposed housing, as compared to the proposed project, would proportionately increase the amount of growth pressure elsewhere in the DCWPCP area.	
10. Plan for medium-density residential development in distinct and logically-phased “villages” to take advantage of the proximity of the project site to region-serving	Does not meet. The Alternative does not meet the objective, as development would not occur.	Does not meet. The Alternative would not include medium-density residential development and would not be organized by villages.	Meets. Though at a reduced amount, the Alternative would provide for medium-density residential development that could be arranged into villages.

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Table 18-13 Project Objective Alternatives Analysis			
Project Objective	No Project (No Build) Alternative	Buildout Pursuant to Existing Community Plan Alternative	Reduced Density Alternative
arterials, and to better support opportunities for transit.			
11. Provide for a cohesive plan of development that maximizes internal connectivity within the project site for pedestrian and bicycle travel.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Does not meet. Because residential development would be limited to the western portion of the project site, connectivity between such residential uses and Antelope Road would be limited by the proposed intervening industrial uses.	Meets. Similar to the proposed project, the Alternative would include sidewalks within on-site internal street systems and along frontages at PFE Road and Antelope Road.
12. Provide a comprehensively planned project that protects sensitive environmental habitat and resources.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. Both Alternatives would preserve the riparian habitat associated with the Dry Creek tributaries as open space via conservation easement or similar mechanism.	
13. Provide a planned infrastructure system with all public facilities and services necessary to meet the needs of development of the project site.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Meets. It is anticipated that this alternative could include concomitant development of necessary public facilities and services to meet the needs of the alternative.	Meets. It is anticipated that this alternative could include concomitant development of necessary public facilities and services to meet the needs of the alternative.
14. Provide a sufficient number of residential units within the project site to support necessary improvements to local and regional public service facilities.	Does not meet. The Alternative does not meet the objective, as development would not occur.	Partially meets. Both Alternatives would include fewer residential units compared to the proposed project. Thus, funding for public services and facilities generated by development impact fees would be reduced.	