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ALTERNATIVES ANALYSIS

12.1 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.

12.2 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

The project alternatives need to feasibly attain most of the basic objectives of the project, but avoid or substantially lessen any of the significant effects of the project. The following project objectives have been developed by the project applicant for the proposed project:

The primary objective of the proposed project is to provide a state-of-the-art permanent campus for a new pre-K through 8th grade school to serve approximately 100 UAIC students, along with a Tribal Education Center for approximately 30 adult and high school aged Tribal members throughout the week. Additionally, a Cultural Center will provide space for galleries, archives and cultural activities. The Tribal School would serve UAIC students and their families through a

program of experiential learning and cultural immersion, and is not proposed for open enrollment to the general public. To serve the unique needs of UAIC students and families, the Tribal School's basic objectives are as follows:

1. Establish and maintain a high-quality academic pre-k through 8th grade campus program alongside extra-curricular programs that together create an enriching school experience. For such a program to be offered, the following elements are necessary:
 - a. Adequate acreage to accommodate a pre-k through 8th grade requisite academic, administrative, cultural, outdoor/nature interactive and athletic activities.
 - b. Adequate classroom space to establish and maintain a broad program of academic courses, electives and cultural programs and activities required for a state-of-the-art pre-K through 8th grade school campus for Tribal members.
 - c. Adequate classroom space to establish and maintain a continuing education program for adult members of the UAIC.
 - d. Adequate space for administrative offices, a library and service areas.
 - e. Athletic and recreational areas on the campus site, accessible year around and in evenings, including a small (non-regulation) lighted ballfield and play areas.
 - f. A kitchen and dining facility to provide nutritious breakfast, lunch and afternoon meals for students, faculty and staff.
 - g. A vibrant pre-k through 8th grade student life on campus with buildings and places designed for both work and play.
 - h. A cultural center to further the study and research of Tribal history and traditions and to promote cultural participation, outreach and exchange among Tribal members and eventually the general public.
 - i. Consolidate Tribal education activities and programs, including pre-k through 8th grade and adult education, onto a single integrated campus.
2. Provide safe and efficient access, parking, and internal circulation to accommodate students, faculty/staff and families, along with a private shuttle service for attending students.
3. Accommodate pre-k through 8th grade school graduation, admissions and other student-centered events.
4. Create a positive relationship with the community by creating a campus that will have minimal impact on the surrounding neighborhood.
5. Utilize a site of sufficient area and topography for a school campus, with adjacent major roadway and convenient freeway access, and available wet and dry utilities, including sewer connection.
6. Integrate a keen awareness of the environment and other factors that comprise the natural setting for the Tribal School and utilize the unique location in the school's educational environment.
7. Preserve the majority of pond, riparian and oak woodland habitat and rock outcroppings on the project site.
8. Comply with existing County development standards.
9. Create a low-impact, low-intensity, and primarily one-story accessible campus environment with multiple buildings housing classroom and non-classroom uses.
10. Provide for a safe and secure educational environment for Tribal students and family members.

Significant Impacts Identified for the Proposed Project

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

The EIR concluded that the following impacts would be reduced to a less-than-significant level with implementation of mitigation:

- **Biological Resources.** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, western pond turtle, special-status birds and birds protected under the Migratory Bird Treaty Act (MBTA), American badger, and pallid bat. Given that the proposed project would involve the removal of 31 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 wetlands. 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 although unique archeological resources have not been identified on the project site or in the immediate vicinity, the possibility exists that previously unknown resources could be discovered on the project site during construction activities. Thus, construction activities associated with buildout of the proposed project could substantially cause an adverse change in the significance of a unique archeological resource or disturb human remains, including those interred outside of formal cemeteries. Similarly, the possibility exists that construction of the proposed project could uncover previously unknown tribal cultural resources, particularly during grading or other ground-disturbing activities. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources would be less than significant.
- **Hazardous Materials and Hazards.** The EIR determined that development of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, create a health hazard or potential health hazard, and expose people to existing sources of potential health hazards, specifically related to an existing on-site septic tank and water well, asbestos-containing materials and lead-based paints associated with the existing on-site structures, and soil contamination issues. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned hazards would be less than significant.

- **Noise.** The EIR determined that construction noise levels associated with the proposed project could be considered to result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. In addition, operation of construction equipment near off-site sensitive receptors could result in the exposure of persons to excessive groundborne vibration or groundborne noise levels. While operational noise from schools is considered exempt from Placer County standards, the EIR determined that operation of speakers during events at the project site could result in temporary increases to ambient noise levels in excess of the County's standards. However, the EIR requires mitigation in order to ensure that construction noise and vibration impacts, as well as potential impacts related to operational uses of speakers at events, would be less than significant.
- **Transportation and Circulation.** The EIR determined that construction of the proposed project could interfere with existing roadway operations. In addition, special events occurring at the project site during the PM peak hour could create circumstances justifying safety measures at the project access. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned hazards would be less than significant.

The Initial Study prepared for the proposed project determined that the following impacts would be reduced to a less-than-significant level with implementation of mitigation (see Appendix C of this EIR):

- **Geology and Soils.** The Initial Study determined that 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, the proposed project could result in a significant increase in wind or water erosion of soils, either on- or off-site, result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake, and could result in potential impacts related to unstable geologic units or soils, including expansive soils. However, the Initial Study requires mitigation in order to ensure that such impacts would be less than significant.
- **Hydrology and Water Quality.** The Initial Study determined that the proposed project could result in potentially significant impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water. In addition, short-term construction activities associated with the proposed project could result in soil erosion or the loss of topsoil. However, the Initial Study requires mitigation, including submittal of a final drainage report to the County, in order to ensure that such impacts would be less than significant.

Significant and Unavoidable

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

- **Transportation and Circulation.** The EIR determined that impacts to the following study intersections under Existing Plus Project Conditions would be significant:
 - Taylor Road/Penryn Road (Placer County);
 - Taylor Road/Webb Street (Town of Loomis); and
 - Taylor Road/Horseshoe Bar Road (Town of Loomis).

With the implementation of mitigation, the impact to the Taylor Road/Penryn Road intersection would be reduced to a less-than-significant level. However, impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain significant and unavoidable. In addition, under the Cumulative Plus Project Conditions, the proposed project would result in a significant and unavoidable cumulative impact at the following study intersections:

- Taylor Road/Rippey Road (Town of Loomis);
- Taylor Road/King Road (Town of Loomis); and
- Taylor Road/Webb Street (Town of Loomis).

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:

- **Air Quality and Greenhouse Gas Emissions.** The EIR determined that impacts related to air quality and greenhouse gas (GHG) emissions would be less than significant, and mitigation would not be required.
- **Cultural Resources.** The EIR determined that impacts to historical resources and unique paleontological resources or geologic features would be less than significant. For such impacts, mitigation would not be required.
- **Hazards and Hazardous Materials.** The EIR determined that impacts related to emission of hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school would be less-than-significant, and mitigation would not be required.
- **Noise.** The EIR determined that impacts related to exposure of people to or generation of noise in excess of established standards would be less than significant. For such impacts, mitigation would not be required.
- **Transportation and Circulation.** The EIR determined that under Existing Plus Project and Cumulative Plus Project Conditions, impacts to study roadway segments would be less than significant. In addition, impacts related to emergency access, parking capacity, and transit, bicycle, and pedestrian facilities would be less than significant. For such impacts, mitigation would not be required.

- **Utilities and Service Systems.** The EIR determined that impacts related to wastewater treatment and collection, water supplies, solid waste, and gas and electric facilities would be less than significant. For all utility and service system impacts, mitigation would not be required.

In addition to the project-specific impacts listed above, a number of cumulative impacts associated with each issue area were determined to be less-than-significant or less than cumulatively considerable. Furthermore, the Initial Study prepared for the proposed project determined that no impacts or less-than-significant impacts would occur to the following issue areas, and mitigation would not be required:

- Aesthetics (all items);
- Agricultural and Forest Resources (all items);
- Air Quality (Item III-5);
- Biologic Resources (Items IV-6 and -8);
- Geology and Soils (Items VI-4 and -7));
- Hazards and Hazardous Materials (Items VIII-1 and -4 through -7);
- Hydrology & Water Quality (Items IX-1, -2, and -8 through -11);
- Land Use and Planning (all items);
- Mineral Resources (all items);
- Noise (Items XII-4 and -5);
- Paleontological Resources (all items);
- Population and Housing (all items);
- Public Services (all items);
- Recreation (all items);
- Transportation and Traffic (Item XVII-8); and
- Utilities and Service Systems (Items XIX-3, -4, and -7).

12.3 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. In determining potential off-site locations, the feasibility and suitability of such locations for development of the proposed project was considered. One specific factor evaluated was whether the project applicant had access to or ownership of alternative sites. While the UAIC retains ownership of properties other than the proposed project site, such properties are not located near population centers where most UAIC tribe members currently reside and do not have adequate access to accommodate a school facility. The UAIC considered renting existing off-site facilities; however, the only property available was located within an urban setting and did not include space for outdoor recreation.

Because the UAIC currently owns the proposed project site, but does not own any other nearby parcels that could accommodate a school facility, development of an off-site alternative would require purchase of a new property, if such a property is available. Thus, the feasibility of an off-site alternative would be limited by the availability of alternative sites for acquisition by the UAIC.

Another limitation of the off-site alternative parcel options would be the reduced amount of oak woodland, riparian habitat, and other on-site natural features available as educational resources to future UAIC students. While the subject site is well-suited for a school with ample educational opportunities, other off-site parcels would be unlikely to include such unique characteristics as a pond, oak woodland, grassland, and a large enough overall acreage such that existing natural features could be preserved with development of the parcel. In addition, while development of the proposed project site with a school facility would only require a Minor Use Permit under the current Horseshoe Bar/Penryn Community Plan land use designation and zoning, off-site alternatives may require a Community Plan Amendment or Rezone. As such, off-site alternatives would have a greater potential to result in planning incompatibilities.

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;
- No Ballfield Lighting Alternative; and
- Reduced Scale Alternative.

See Table 12-3 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project. It should be noted that the following analysis focuses on the potentially significant impacts identified for each issue area per the EIR and the Initial Study prepared for the proposed project, unless otherwise noted. As a result, the analysis does not include discussion of Air Quality or Utilities and Service Systems, as all impacts for such CEQA topics were determined to be less than significant in the EIR and Initial Study, and mitigation was not required.

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 further developed. As described in this EIR, the northern portion of the site includes five structures associated with a bed and breakfast/event center facility, a water supply well and septic system, 65 parking spaces, and an irrigation stock pond. The bed and breakfast/event center facility is not currently operational and is assumed to remain as such for the purposes of this analysis. Such an assumption is reasonable based upon the fact that UAIC currently owns the proposed project site and would not be interested in operating a bed and breakfast facility. In general, the northern third of the project site has been subject to a relatively high level of disturbance, while the southern two-thirds is primarily undeveloped. The No Project (No Build) Alternative would not meet any of the project objectives.

Biological Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, potential impacts to biological resources associated with construction and long-term operation of a school on the project site, including disturbance of riparian habitat and other sensitive natural communities, would not occur. Therefore, no impacts related to biological resources would occur under the No Project (No Build) Alternative.

Cultural Resources

The No Project (No Build) Alternative would not involve ground-disturbing activities associated with construction. Therefore, potential impacts related to causing an adverse change in the significance of a unique archeological resource, disturbance of human remains, and disturbance of previously unknown tribal cultural resources would not occur.

Geology and Soils

The No Project (No Build) Alternative would not require grading of the project site and would not include ground-disturbing activities related to site preparation, paving, utility placement, and various other construction activities. Because on-site soils would not be disturbed, no impact related to significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would occur. In addition, because the No Project (No Build) Alternative would not include construction activities, no impact would occur related to wind or water erosion of soils.

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. Furthermore, mitigation of potential health hazards related to existing asbestos-containing materials and lead-based paints associated with the existing on-site structures, as well as soil contamination issues, would not be required. However, in the absence of remedial actions to remove existing soil contaminants, stormwater runoff at the site could entrain on-site contaminants and carry such contaminants to receiving drainage systems. Therefore, impacts related to hazards and hazardous materials would be greater under the No Project (No Build) Alternative as compared to the proposed project.

Hydrology and Water Quality

Because the No Project (No Build) Alternative would not include development of portions of the site with impervious surfaces and would not alter drainage patterns, submittal of a final drainage report would not be required. Impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water would not occur. Unlike the proposed project, the No Project (No Build) Alternative would not include ground-disturbing activities. Therefore, impacts related to soil erosion or loss of topsoil would not occur.

Noise

Given that the No Project (No Build) Alternative would not include construction activities, mitigation to reduce construction noise would not be required. Furthermore, the No Project (No Build) Alternative would not include hosting events within the project site and, as such, mitigation regarding orientation of speakers during events 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 9-1 related to preparation of a Construction Traffic Management Plan (CTMP) would not be required. In addition, because project traffic would not be added to area roadways, significant and unavoidable impacts to study intersections would be avoided. Therefore, impacts related to transportation and circulation would not occur under the No Project (No Build) Alternative.

No Ballfield Lighting Alternative

Under the No Ballfield Lighting Alternative, the proposed ballfield facility would not include nighttime lighting in the form of five 40-foot light poles. As such, outdoor events could not occur at the ballfield after dusk and would be limited to daylight hours. In contrast, use of ballfield lighting as part of the proposed project would enable the use of the ballfield to host events until 10:00 PM. Thus, the No Ballfield Lighting Alternative would restrict the use of the field relative

to the proposed project, particularly during winter months when daylight is more limited. All other project components would remain unchanged from the current development proposal.

Because the ballfield would not be available for evening use during winter months, the No Ballfield Lighting Alternative would only partially meet Objective #1(e). All other project objectives would be met.

It should be noted that impacts related to aesthetics, including light and glare, were dismissed as less than significant per the Initial Study prepared for the proposed project (see Appendix C to this EIR). Nonetheless, potential changes regarding light and glare occurring under the No Ballfield Lighting Alternative are discussed below for informational purposes in order to address public concerns submitted during the Notice of Preparation (NOP) review period for the proposed project.

Aesthetics

As described in Chapter 3, Project Description, of this EIR, the ballfield would be illuminated by five 40-foot light poles, placed throughout the field. Each of the five light poles would include six LED fixtures mounted onto a bracket; the LED fixtures would be tilted at approximately 40 degrees toward the field. When the light poles are in use, light levels at the western property line are anticipated to range from 0.0 to 0.2 foot-candles; thus, light spillage onto neighboring residential properties would be minimal. For reference, one foot-candle is roughly equivalent to the illumination produced by one candle at a distance of one foot. The ballfield would be used for baseball and soccer games with the capabilities of nighttime use. Practices could be held twice a week with games both onsite and offsite, on weekdays and/or weekends. Should nighttime activities related to either sport occur, nighttime use hours would not extend past 10:00 PM.

Given that the No Ballfield Lighting Alternative would not include five 40-foot light poles at the perimeter of the proposed ballfield area, light levels at the western boundary of the proposed project site would be reduced compared to the 0.0 to 0.2 foot-candles anticipated to occur under the proposed project. However, the No Ballfield Lighting Alternative would still introduce new sources of light and glare to the site in the form of light spillage from the interiors of the proposed buildings and light fixtures on the exteriors of the buildings.

Similar to the proposed project, the No Ballfield Lighting Alternative would be subject to Section 15.04.490 of the Placer County Code, which adopts the 2016 California Energy Code (CEC), CCR Title 24, Part 6. Section 140.7 of the CEC contains specific requirements for outdoor lighting that limit allowable lighting power for specified applications. The proposed buildings would not include excessively large windows or other reflective materials which would create substantial sources of glare to neighboring residences or motorists travelling along Taylor Road. Overall, the less-than-significant impacts related to aesthetics, including light and glare, would be reduced under the No Ballfield Lighting Alternative compared to the proposed project.

Noise

In addition to the use of the ballfield for nighttime games, the proposed project could occasionally include use of the site, including the ballfield, to host special events. As described in Chapter 3,

Project Description, events could occur after hours and on the weekends, but such events would not begin earlier than 7:00 AM or continue past 10:00 PM. The largest potential events could occur up to three times a year and could take place during school hours, from approximately 10:00 AM to 2:00 PM on weekdays, or outside of school hours, from approximately 5:00 PM to 8:00 PM in the evening. The large events could accommodate approximately 200 people, though some students and staff may already be on school property. Events could include outdoor and/or indoor activity.

Under the No Ballfield Lighting Alternative, fewer outdoor events (i.e., sporting matches and graduations), would occur at the proposed project site, as the proposed ballfield would not be available for use after dark. The EIR concluded that while operational noise from schools is considered exempt from Placer County standards, mitigation would be required for the proposed project to ensure that speakers used for events are oriented away from existing residential uses to the west of the site. Such mitigation would continue to be required under the No Ballfield Lighting Alternative; however, because the frequency of outdoor events would be reduced, impacts related to temporary increases to ambient noise levels in excess of the County's standards would be fewer.

Other Issue Areas

Given that the differences between the No Ballfield Lighting Alternative and the proposed project are limited to nighttime lighting of the proposed ballfield only, impacts related to the following issue areas for which mitigation has been identified would be similar to the proposed project: biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; and transportation and circulation. All mitigation measures identified for the proposed project would still be required under the No Ballfield Lighting Alternative. The Alternative would not avoid any of the significant and unavoidable impacts anticipated to occur under the proposed project.

Reduced Scale Alternative

Under the Reduced Scale Alternative, the project would consist of a pre-kindergarten through fifth grade elementary school rather than a pre-kindergarten through eighth grade elementary/middle school. In addition, the Reduced Scale Alternative would omit the Adult Education Center and the Tribal Cultural Center facilities. Under the proposed project, the two buildings would include 9,640 square feet (sf) and 14,000 sf, respectively. Thus, the overall development footprint would be reduced by approximately 23,640 sf. The area where the Adult Education Center and Tribal Education Center facilities are currently proposed would remain open space.

UAIC students grades six through eight would remain at the existing UAIC school facility located at 10720 Indian Hill Road in Auburn, California. While the proposed project would serve approximately 100 UAIC students and employ 43 staff members, the Reduced Scale Alternative would serve approximately 57 UAIC students and support 30 staff members.

The Reduced Scale Alternative would not alter the proposed project school hours, which would be 7:30 AM to 4:30 PM, Monday through Friday. With the exception of the Adult Education Center and the Tribal Cultural Center, the proposed site amenities would remain the same as the proposed

project. Similar to the existing UAIC school in Auburn, as well as the proposed project, approximately 90 percent of future students would be bussed to and from the Alternative school. However, the Reduced Scale Alternative would reduce the number of special events from 1-2 per month to one per month, or two events every three months. Similar to the proposed project, such events could include attendance of up to approximately 200 people, although some students and staff may already be located on school property.

Under the Reduced Scale Alternative, Objectives #1 and #3 would only partially be met, as the alternative would not accommodate students grades six through eight and would not include a cultural center or adult education program. In particular, the omission of a cultural center would not provide on-site cultural education opportunities to future UAIC students and, thus, Objective #1(h) would not be met. The UAIC is intending to consolidate pre-kindergarten through eighth grade classes as well as adult education opportunities and a cultural center on a single site. Under the Reduced Scale Alternative, UAIC students grades six through eight would remain at the existing UAIC school located in Auburn. Therefore, the Reduced Scale Alternative would not achieve Objective #1(i) related to consolidation of UAIC education activities and programs onto a single, integrated campus would not be met. With the exception of Objectives #1 and #3, all other project objectives would be met.

Biological Resources

Under the Reduced Scale Alternative, improvements to the existing irrigation stock pond would still occur. As such, impacts related to potential disturbance of riparian habitat and other sensitive natural communities would be similar. However, because the Reduced Scale Alternative would not include ground-disturbing activities associated with construction of the Adult Education Center and Tribal Cultural Center, less grassland habitat would be disturbed relative to the proposed project. In addition, the Reduced Scale Alternative would require removal of fewer trees protected by the County's Tree Preservation Ordinance compared to the proposed project.

Similar to the proposed project, mitigation would be required for special-status plant species, western pond turtle, special-status birds or birds protected under the Migratory Bird Treaty Act, American badger, and pallid bat. However, given that ground-disturbing activities would include a reduced overall disturbance area compared to the proposed project, impacts to biological resources would be fewer under the Reduced Scale Alternative.

Cultural Resources

Similar to the proposed project, ground-disturbing activities associated with construction of the Reduced Scale Alternative could potentially disturb previously unknown archeological resources or human remains located on the project site. Although portions of the project site have been previously developed and highly disturbed, given similar environmental factors of the proposed project site to known Native American resource sites within Placer County, a potential exists for unrecorded Native American resources to be discovered within the project area. Thus, the possibility exists that construction of the Reduced Scale Alternative could uncover previously unknown tribal cultural resources, particularly during grading or other ground-disturbing activities. However, given that the total disturbance area associated with the Reduced Scale

Alternative would be reduced by approximately 23,640 sf compared to the proposed project, the aforementioned impacts would be fewer under the Alternative compared to the proposed project. Associated mitigation measures would continue to be required.

Geology and Soils

As noted above, the total disturbance area associated with the Reduced Scale Alternative would be reduced by approximately 23,640 sf compared to the proposed project. Therefore, impacts related to significant disruptions, displacements, compaction or overcrowding of on-site soils, and/or substantial change in topography or ground surface relief features would be fewer under the Reduced Scale Alternative. Similarly, impacts resulting in a significant increase in wind or water erosion of soils, either on- or off-site, resulting in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake, and resulting in potential impacts related to unstable geologic units or soils, including expansive soils would be fewer compared to the proposed project. However, mitigation would continue to be required for the Reduced Scale Alternative in order to ensure such impacts are reduced to less-than-significant levels.

Hazards and Hazardous Materials

Under the Reduced Scale Alternative, abandonment of the existing on-site wells and septic systems would continue to be required, as is the case for the proposed project. In addition, similar to the proposed project, the Reduced Scale Alternative would require mitigation of potential health hazards related existing asbestos-containing materials and lead-based paints associated with demolition of existing on-site structures. Implementation of the Department of Toxic Substances Control (DTSC)-approved Removal Action Work Plan, as required by Mitigation Measure 7-2(c), would similarly be required. Overall, impacts related to hazards and hazardous materials would be similar under the Reduced Scale Alternative as compared to the proposed project.

Hydrology and Water Quality

Because the Reduced Scale Alternative would not include the construction of the Adult Education Center and the Tribal Cultural Center facilities, the Alternative would result in the creation of less impervious areas compared to the proposed project. Therefore, impacts related to substantially altering the existing drainage pattern of the project site, increasing the rate or amount of surface runoff, and/or creating or contributing runoff water which would include substantial additional sources of polluted water would be fewer under the Reduced Scale Alternative compared to the proposed project. In addition, as noted previously, the total area of ground disturbance would be reduced by approximately 23,640 sf. Thus, impacts related to soil erosion and loss of topsoil would be fewer compared to the proposed project. However, mitigation requiring submittal of a final drainage report, payment of drainage improvement and flood control fees, and implementation of proper best management practices (BMP) to minimize adverse effects to water quality would still be required for the Reduced Scale Alternative.

Noise

Similar to the proposed project, construction of the Reduced Scale Alternative would require mitigation to minimize groundborne vibration and groundborne noise levels at nearby sensitive receptors. In addition, Mitigation Measure 8-3 related to short-term construction noise would continue to be required. Because the Reduced Scale Alternative would include similar sized special events as the proposed project, Mitigation Measure 8-2 related to orientation of speakers during such events would continue to be required. However, because the frequency of such events would be slightly reduced compared to the proposed project, impacts related to operational noise level increases would be fewer. In addition, because the Reduced Scale Alternative would not include construction of an Adult Education Center or Tribal Cultural Center, the overall intensity of construction would be reduced. Thus, impacts related to construction noise and vibration would be fewer compared to the proposed project.

Transportation and Circulation

As a result of demolition, site preparation, grading, and delivery of materials, construction of the Reduced Scale Alternative would generate vehicle trips on local roadways, including heavy-duty haul truck trips. In addition, similar to the proposed project, the Reduced Scale Alternative would include minor improvements to Taylor Road along the project frontage, which could temporarily impede traffic. Mitigation Measure 9-1, which requires preparation of a Construction Traffic Management Plan (CTMP) by the project applicant, would continue to be required.

Per trip generation forecasts prepared for the proposed project by KD Anderson & Associates, Inc., the Reduced Scale Alternative would result in approximately 176 average daily trips (ADT) as compared to 254 ADT occurring with development of the proposed project (see Table 12-1 and Table 12-2). Because fewer vehicle trips would be generated by the Reduced Scale Alternative, the intensity of traffic-related impacts would be decreased compared to the proposed project. However, impacts to the Taylor Road/Webb Street and Taylor Road/Horseshoe Bar Road intersections would remain significant and unavoidable under Existing Plus Alternative Project Conditions.

Similarly, under the Cumulative Plus Project Conditions, the Reduced Scale Alternative would continue to result in a significant and unavoidable cumulative impact at the Taylor Road/Rippee Road, Taylor Road/King Road, and Taylor Road/Webb Road intersections within the Town of Loomis. Nonetheless, development of the Reduced Scale Alternative would result in fewer impacts related to transportation and circulation compared to the proposed project.

Table 12-1														
Reduced Scale Alternative Trip Generation														
Description	Quantity	Mode	Occupant Rate	Vehicles	Vehicle Trips									
					ADT	AM Peak Hour (7:00 to 9:00 AM)			Afternoon Peak Hour (2:30 to 3:30 PM)			PM Peak Hour (4:00 to 6:00 PM)		
						In	Out	Total	In	Out	Total	In	Out	Total
Pre K – 5 th students	4	Auto	1.25	3	16	3	3	6	2	2	4	2	2	4
	50	Van	12.0	8	64	8	8	16	8	8	16	8	8	16
Pre K < 2 yrs	3	Auto	1.25	3	16	3	3	6	0	0	0	0	0	0
School Staff	30	Auto	1.00	30	60	30	0	30	0	13	13	0	18	18
Misc. Trips	10	Auto		10	20	1	1	2	1	1	2	1	1	2
Total:					176	45	15	60	11	24	35	11	29	40

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

Table 12-2		
Proposed Project vs. Reduced Scale Alternative Average Weekday Trip Generation		
Duration	Proposed Project Trips	Reduced Scale Alternative Trips
Daily	254	176
AM Peak Hour	78	60
Afternoon Peak Hour	41	35
PM Peak Hour	63	40

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

12.4 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 No Project (No Build) Alternative, as shown in Table 12-3 below.

As discussed throughout this chapter and shown in Table 12-3, while impacts related to light and glare were dismissed as less than significant in the Initial Study prepared for the proposed project, such impacts would be reduced under the No Ballfield Alternative. In addition, because outdoor events at the proposed ballfield would not occur after dark, associated noise impacts would be reduced compared to the proposed project. Under the Reduced Scale Alternative, impacts related to biological resources, cultural resources, geology and soils, hydrology and water quality, and noise would be fewer as a result of the reduced overall disturbance area. In addition, traffic-related impacts associated with operations at study intersections would be reduced compared to the proposed project. For all other issue areas for which the proposed project requires mitigation, impacts would be similar to the proposed project under both alternatives. None of the significant and unavoidable traffic impacts identified for the proposed project would be avoided.

Given that the Reduced Scale Alternative would reduce a greater number of impacts compared to the No Ballfield Alternative, the Reduced Scale Alternative becomes the environmentally superior alternative for the proposed project.

Table 12-3 Comparison of Environmental Impacts for Project Alternatives				
Resource Area	Proposed Project	No Project (No Build) Alternative	No Ballfield Lighting Alternative	Reduced Scale Alternative
Aesthetics	Less-Than-Significant	--	Fewer	--
Biological Resources	Less-Than-Significant with Mitigation	None	Similar	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Similar	Fewer
Geology and Soils	Less-Than-Significant with Mitigation	None	Similar	Fewer
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	Greater	Similar	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Similar	Fewer
Noise	Less-Than-Significant with Mitigation	None	Fewer	Fewer
Transportation and Circulation	Significant and Unavoidable	None	Similar*	Fewer*
Total Fewer:		6	2	6
Total Similar:		1	6	1
Total Greater:		0	0	0
Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."				
* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.				