

## 02 ALTERNATIVES

### INTRODUCTION

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This chapter describes a range of reasonable alternatives, which would avoid or lessen significant impacts associated with the project. An evaluation which compares impacts of the alternatives to the proposed project's impacts is included. Finally, this chapter culminates by choosing an "environmentally superior alternative".

### RANGE OF ALTERNATIVES

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According to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines:

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.

This chapter describes alternative versions of the proposed project which could lessen impacts or that provide meaningful information to foster informed decisions. Impact discussions are briefer than those found in the Project chapters, consistent with CEQA Guidelines Section 15126.6(d). This chapter does not repeat background discussions or other subject matter which has already been described in the topical chapters of this EIR, but focuses on those alternative impacts which are substantively different than the impacts described for the project. Reviewers are encouraged to read the topical chapters describing project impacts prior to reading the Alternatives chapter. The proposed project would result in significant environmental impacts that cannot be avoided related to Operational Air Quality and Transportation; impacts to the project from Climate Change were found to be potentially significant.

To foster meaningful public discussion and informed decision-making, a range of reasonable alternatives to the project is provided. This range includes the "no project" alternative, the purpose of which is to allow the County hearing body to compare the impacts of approving the proposed project to the impacts of not approving the proposed project. The "No Project" alternative describes what the property owner could construct under existing entitlements.

### ALTERNATIVES CONSIDERED BUT REJECTED

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Multiple Alternatives to the Project were considered but ultimately rejected. CEQA Guidelines section 15126.6 states that:

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. Additional information explaining the choice of alternatives may be included in the administrative record. 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.

An agency need not find that a project is literally impossible before it can reject an alternative as infeasible. The finding may be made based on policy considerations or project objectives (ex: *California Native Plant Society, et al. v. City of Santa Cruz, et al.*) or based on specific economic, legal, social, technological, or other considerations (CEQA Guidelines Section 15091).

## PROJECT OBJECTIVES

Pursuant to Section 15126.6 of the CEQA Guidelines, an alternative must also "attain most of the basic objectives of the project". The stated objectives of the project are as follows:

- Develop a mixed-use community using quality urban design on the largest undeveloped property in the Antelope community that improves upon the design standards of the Antelope Community Plan and incorporates the Sacramento Area Council of Government's "Smart Growth" principles, as established in SACOG's Blueprint process.
- Develop an economically feasible community that reasonably minimizes its impact on biologically sensitive natural resources and utilizes existing and planned public infrastructure and services in an efficient manner.
- Create a community with an interconnected street grid pattern that disperses traffic, eases congestion, and provides a high quality pedestrian network and public realm that encourages convenient access to local parks and schools.
- Provide a mix of land uses including shopping, restaurants, apartments, and a variety of home types, sizes, and pricing, to accommodate a diversity of ages, income levels, cultures, and races.
- Provide job opportunities and neighborhood-serving commercial uses for the community.
- Create a discernable village center with quality public space as a focal point and a range of uses and housing densities within a 10-minute walk.
- Organize more homes, shops, and services closer together for ease of walking, to enable more efficient use of services and resources, and to create a more convenient, enjoyable place to live.
- Encourage the use of bicycles, rollerblades, skateboards, schools, and walking as modes of transportation with a pedestrian-friendly village concept design. Use infrastructure improvements to provide multiple linkages to the area's existing trail and bikeway system

- Develop a community with park, school, and green transportation elements that enable a high quality of life in a place that enriches, uplifts, and inspires the human spirit.
- Preserve natural resources within the wetland area along the eastern side of the project site.
- Improve the ability to complete needed infrastructure in the Antelope community through building fees and tax revenues from property assessment and retail sales.

## PRELIMINARY AND REJECTED ALTERNATIVES

Several preliminary alternatives were considered but were ultimately rejected and are not included in the “Description of Alternatives” section below. These alternatives include “Direct Poker Lane Alignment”, “High Density Front-On Lots”, and “Multiple Basins”. The Direct Poker Lane Alignment alternative would have continued the exiting alignment of Poker Lane west to connect to Titan Drive instead of sweeping the roadway north as planned for the proposed project. In this alternative the neighborhood commercial center would be located on the southeastern corner of the intersection of Poker Lane and Don Julio Boulevard as opposed to the southwestern corner as planned for the proposed project. This alternative would have resulted in the removal of a prominent oak tree and was rejected due to community concern over the loss of the tree. The High Density Front-On Lots alternative would have higher density lots along Don Julio Boulevard. This alternative was rejected during multiple meetings with the community. Finally, the Multiple Basins alternative would have up to 19 small shallow basins located throughout the project site. This alternative was rejected by the Department of Water Resources in favor two larger basins.

### *ALTERNATE LOCATION OF PROJECT*

There are no feasible alternative locations that would meet the stated objectives for the project. The project site is one of the last infill properties in the Antelope community. The only other locations that could support a development of this size would be outside the Antelope community and outside the current limits of public services. These sites would require the extension of public services, which has the potential to result in greater environmental impacts than those anticipated for the proposed project. Furthermore, one of the stated goals of the project is complete the infrastructure within the Antelope community. Located the project outside the Antelope community would not achieve this goal. Thus, it is not feasible for the developer to seek out an alternative location for the proposed Project. This alternative is rejected and not considered further.

## DESCRIPTION OF ALTERNATIVES

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As noted above, the provided alternatives must also be feasible. “Feasibility” of alternatives is described in the CEQA guidelines Section 15364 as follows:

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

The alternatives analyzed in this chapter are detailed below.

## ALTERNATIVE 1 (NO PROJECT/EXISTING ZONING):

The No Project alternative represents either no development of the site, or instead, what might be developed on the 128-acre project site with existing entitlements and lots. The site is currently zoned UR (Urban Reserve – 87.5± acres), SPA (Special Planning Area – 30.2± acres), AR-2 (Agricultural-Residential – 8.7± acres), and RD-5 (Residential – 1.7± acres). These designations are distributed over five large parcels: APNs 203-0120-059, -065, -067, -094 and -018.

**Table AL-1** below shows existing APN designations, lot sizes, zoning and examples of permitted uses. Note that without subdividing the property, only one single-family residence may be built in residential or agricultural-residential zones by right. Multiple-family residences are not allowed in these zones by right.

**Table AL-1: Existing Zoning and Permitted Uses**

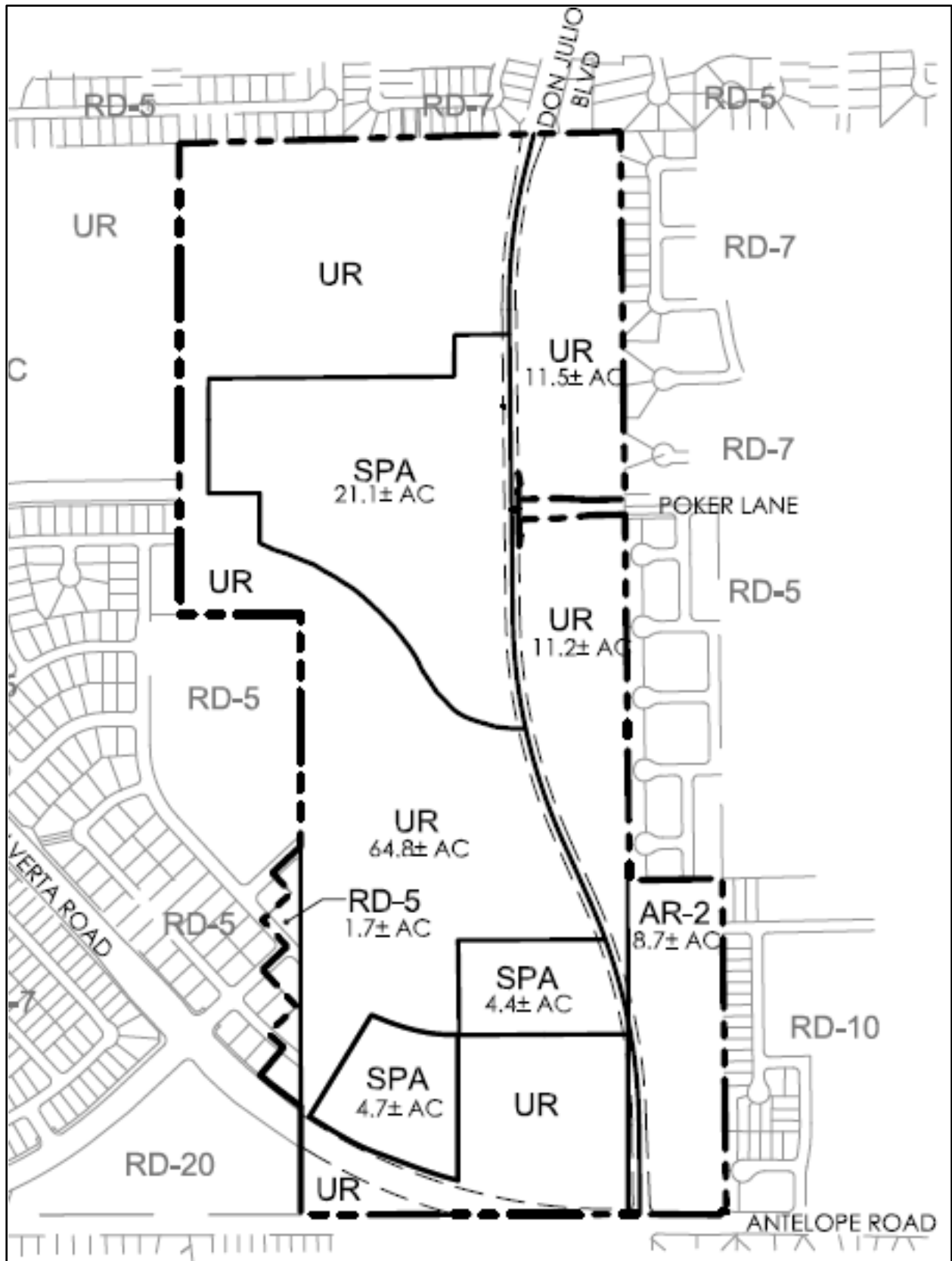
APN	Lot Size (acres)	Zoning	Examples of Permitted Uses* (without new entitlements)
203-0120-018	7.96	Agricultural-Residential, 2-acre min. lot size (AR-2)	<ul style="list-style-type: none"> <li>• 1 single-family residence</li> <li>• Family day-care homes</li> <li>• General agricultural uses</li> <li>• Public schools (K-12)</li> <li>• Gov't. buildings</li> <li>• Community garden, park, wildlife preserve</li> <li>• Wholesale plant nursery</li> </ul>
203-0120-059	92.57	Antelope Town Center Special Planning Area (SPA) (30.2 discontinuous acres – see Plate LU-2)	<ul style="list-style-type: none"> <li>• Offices/Retail in Mixed-Use District</li> <li>• Apartments in MF District</li> <li>• Likely could not be feasibly developed corresponding to SPA ordinance without further entitlements (sub-divisions, use permits)</li> </ul>
		Urban Reserve (UR) (62.5 discontinuous acres – see Plate LU-2)	<ul style="list-style-type: none"> <li>• 1 single-family residence</li> <li>• Family day-care homes</li> <li>• Farm worker housing (not multi-family)</li> <li>• General agricultural uses</li> <li>• Public schools (K-12)</li> <li>• Gov't. buildings</li> <li>• Community garden, park, wildlife preserve</li> <li>• Wholesale plant nursery</li> </ul>
203-0120-065	10.39	Urban Reserve	<ul style="list-style-type: none"> <li>• Same as above</li> </ul>
203-0120-067	10.39	Urban Reserve	<ul style="list-style-type: none"> <li>• Same as above</li> </ul>
203-0120-094	2.24	RD-5	<ul style="list-style-type: none"> <li>• 1 single-family residence</li> <li>• Family day-care home</li> <li>• Public schools (K-12)</li> <li>• Gov't. buildings</li> <li>• Community garden, park</li> </ul>

\* Sacramento County Zoning Code, Section 3.2.5, *Allowed Uses in All Zoning Districts*.

As shown in **Table AL-1**, the potential uses are limited by zoning and parcel size. Additionally, the Sacramento County General Plan Land Use Policy LU-5 requires that land zoned for 15 units per acre or less be developed at a density not less than the minimum density of the range. For example, land zoned RD-5 permits residential development at five units per acre. A 2.24-acre RD-5 parcel might accommodate 10 units, but would require subdividing prior to development. Land zoned Urban Reserve permits few uses other than single-family residences, as it is an interim zone that anticipates re-zoning to greater densities.

Parcel 203-0120-059, the largest in the subject property, is divided into two zoning designations – Antelope Town Center SPA and Urban Reserve. As noted in the Land Use discussion, the Don Julio Special Planning Area, which would have set forth zoning designations for the entire Barrett Ranch East property, was never adopted. The Antelope Town Center SPA covers three segments of the parcel (see **Plate AL-1** below). The 3.9-acre and 3.3-acre portions, while not separate parcels, are zoned for multi-family uses. They could be accessed from Elverta Road and Don Julio Boulevard and developed with apartments – if site improvement standards could be met. Otherwise, Parcel 203-0120-059 would require subdivision and infrastructure for development according to the SPA's vision. Still, site improvement standards would likely preclude development of separate multi-family projects with a substantial portion of the property remaining undeveloped. At most, the five existing parcels could be developed with one single-family residence each without further discretionary entitlements.

Plate AL-1: Existing Zoning



## ALTERNATIVE 2(NATURAL RESOURCE PRESERVATION)

This Alternative would preserve the vernal pools on the subject property, the natural drainages and the mature oak trees (see **Plate AL-2** for wetland locations). The proposed project generally avoids the natural drainage, placing it in an open space area (Lot H). However, a neighborhood park and residential lots would displace all the vernal pools on the site, and construction would encroach some of the native oaks. To avoid the natural resources on the property the subdivision layout would need to be re-designed. The result would likely mean fewer residential lots and increased passive park space. Conversely, areas of the subject property could accommodate greater densities – townhomes, row houses, etc. – and effectively gain residential lots on less environmentally-sensitive portions of the property.

Approximately 16 single-family lots (proposed zoning RD-5 and RD-7) would be eliminated to avoid the natural resources on the project site. At a minimum, the detention basin north of Titan Drive and west of Street 2 would be expanded and redesigned to accommodate the vernal pool underlying the lots north and east of the basin. Additional lots in Village 1 would be eliminated to avoid the vernal pools along the west property line north of Titan Drive, and a segment of Street 2 and the adjacent lots near the west property line between Streets 7 and 8 would be removed or realigned to accommodate a vernal pool underlying the lots in Village 3.

As in the proposed project, Alternative 2 would require a Community Plan Amendment, Rezone, and Tentative Map Subdivision Map; and would supersede the existing Antelope Town Center SPA. The estimated residential yield for the resource preservation alternative is shown in **Table AL-2** below.

Plate AL-2: Onsite Wetland Locations





**Table AL-2:  
Alternative 2: Estimated Residential Yield with Resource Preservation**

Proposed Land Use	Proposed Zoning	Gross Acreage	Alt. 3 Proposed No. of Units	Maximum No. of Units at Zone Density	Proposed Percentage of Maximum
Single-Family Residential	RD-5	36.5	156*	181	86%
Single-Family Residential	RD-7	61.1	320*	416	77%
Multi-Family Residential	RD-20	2.0	26	42	62%
Multi-Family Residential	RD-25	8.4	170	210	81%
Total Units	497 SF 170 MF				

\*Alternative 2 would eliminate at a minimum 10 RD-5 lots and 6 RD-7 lots.

## IMPACTS AND ANALYSIS

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### LAND USE

#### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

This alternative would either leave the project site vacant, or could result in five single-family residences, one per legal lot. The Antelope Community Plan designates most of the project area as RD-7, seven single-family units per acre; the remainder of the property is designated SPA. However, the latter areas are not legal lots, and could not be developed under SPA densities without additional entitlements, including land division. Existing zoning, shown in **Table AL-1**, would essentially permit one residence per lot.

As described in the Land Use section of this document, the Sacramento County General Plan, the Antelope Community Plan and the Antelope Town Center SPA envision residential development of at least seven units per acre, with a concentration of densities, including mixed uses, along Poker Lane – Titan Drive. Not developing the subject property is thus inconsistent with General Plan goals. Development at current zoning, without further subdivision, is also not consistent with the General Plan, Community Plan or the SPA, since it would result in an overall residential density of 0.04 units/acre (see also discussion of General Plan Land Use Intensity Policies, Land Use section of this document).

Alternative 1 would not accomplish the project’s objectives, particularly those objectives that focus on creating a cohesive neighborhood with gradations of densities, a “discernable village center” and a mix of uses.

#### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

This alternative would develop the proposed project but avoid the natural resources on the property. If no additional lots were created by increasing residential density, the

project would consist of 497 single-family and 170 multiple-family units, with some commercial uses and passive park space. The land use impact discussion above, as well as for the proposed project, applies to this Alternative.

**Table AL-2** shows that Alternative 2 would not substantially conflict with General Plan Land Use Policy LU-5, as most residential unit counts would remain above the required 75% of the zoned maximum. Alternative 3 would not substantially conflict with General Plan Community Design policies, would not juxtapose incompatible uses, and would accomplish project objectives, particularly Objective No. 2, developing an economically feasible community that reasonably minimizes its impact on biologically sensitive natural resources.

Accordingly, given this discussion and the similarities of this Alternative to the proposed project, land use impacts associated with Alternative 2 would be less than significant.

## VISUAL QUALITY AND AESTHETICS

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development on the subject property, or alternatively, could result in five single-family units, one per legal lot. If no development occurred on the site the existing views would be unchanged. Though the view would change if five single-family units were constructed, the view would be similar to the surrounding view. While adjacent neighbors may perceive development of the site negatively, this development would not substantially alter the existing views by introducing an incompatible or visually intrusive use.

### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

This alternative would develop the proposed project but avoid the primary natural resources on the property. Avoidance measures would be required to protect the natural resources during project construction and operation, but as they would be considered part of the approved project design no significant and unavoidable impacts to natural resources would occur. Impacts to visual resources would be substantially the same as those discussed for the preferred project and the commercial alternative.

## WATER SUPPLY

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development on the subject property, or alternatively, could result in five single-family units, one per legal lot. Water supply was determined to be adequate to serve the proposed project. Accordingly, since Alternative 1 would result in substantially fewer residences, if any, and no commercial uses, impacts on water supply would be less than significant.

*ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would result in fewer residences than the proposed project, and would not change the commercial component. Since water supply was deemed adequate for the proposed project, and Alternative 2 proposes lower water demand, water supply would likewise be adequate. Accordingly, impacts on water supply from Alternative 2 would be less than significant.

## SEWER SYSTEM (INCLUDING WASTEWATER TREATMENT FACILITIES)

*ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development on the subject property, or alternatively, could result in five single-family units, one per legal lot. Sewer system capacity was determined to be adequate to serve the proposed project. Accordingly, since Alternative 1 would result in substantially fewer residences, if any, and no commercial uses, impacts on the sewer system would be less than significant.

*ALTERNATIVE 2*

Alternative 2 would result in fewer residences than the proposed project, and would not change the proposed commercial retail or service uses. Since the sewer system capacity was deemed adequate for the proposed project, and Alternative 2 proposes lower demand, sewer system capacity would likewise be adequate. Accordingly, impacts on the sewer system from Alternative 2 would be less than significant.

## PUBLIC SERVICES (LANDFILL CAPACITY, STORM WATER DRAINAGE FACILITIES, UTILITIES, EMERGENCY SERVICES, PUBLIC SCHOOLS AND PARK/RECREATION FACILITIES)

*ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development on the subject property, or alternatively, could result in five single-family units, one per legal lot. Public services were determined to be adequate to serve the proposed project, with no new off-site facilities required. If the five existing lots were developed with individual single-family residences, each building permit would be assessed proportionate school fees. Accordingly, since Alternative 1 would result in substantially fewer residences, if any, and no commercial uses, impacts on public services would be less than significant.

*ALTERNATIVE 2*

Alternative 2 would result in fewer residences than the proposed project, and would not change the proposed commercial retail or service uses. Since public services were deemed adequate for the proposed project, with no new off-site facilities required, and Alternative 2 proposes lower overall demand, public services capacity would likewise be adequate to serve Alternative 2. Accordingly, impacts on public services from Alternative 2 would be less than significant.

## TRAFFIC AND CIRCULATION

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development on the subject property, or alternatively, could result in five single-family units under the current zoning designations, one per legal lot. Five single-family units would generate approximately 45 vehicle trips per day, of unknown miles.<sup>1</sup> Alternative 1 would not substantially affect the current transportation network; however, without development of the subject property, the internal street network would not be developed, Titan Drive and Poker Lane would not be connected, and various intersections would not be improved. Various project objectives regarding transportation would not be accomplished: Objective 3, creating interconnected street network, Objective 8, providing new linkages to the areas existing trail and bicycle network, and Objective 11, contributing to the area's infrastructure deficit through building fees and tax revenues.

### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would result in approximately 16 fewer single-family units than the proposed project, reducing total daily trips by approximately 144 trips (see footnote 1 above). The supplemental traffic study did not evaluate this alternative, but impacts can be estimated by comparing it to the impacts shown for the proposed project and for the commercial alternative. The commercial alternative resulted in 3,281 fewer total daily trips than the proposed project, including 120 fewer AM total trips and 257 PM total trips. The commercial alternative still resulted in significant and unavoidable impacts. Considering that Alternative 2 would minimally lower trip generation compared to the commercial alternative. Mitigation measure CTC-1 would reduce impacts at the Walerga Road and Elverta Road intersection to less than significant; however, the road segment at Antelope Road between Don Julio Boulevard and Roseville Road would still operate at an unacceptable LOS F even with mitigation measure CTC-2. Therefore, transportation impacts for this alternative would also be significant and unavoidable.

## AIR QUALITY

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would not result in substantial construction or operational emissions, either because nothing would be constructed on the project site, or because under existing zoning and lot boundaries, only five single-family residences could be constructed. Accordingly, air quality impacts would be expected to be less than significant, either with no development of the property, or with a small number of single-family units.

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<sup>1</sup> Kimley-Horn, *Memorandum to George Carpenter from Matt Weir re: Supplemental Traffic Impact Analysis (Land Use Alternate)*, December 7, 2015, p. 1. The traffic impact analysis prepared for the project estimates that 495 single-family units would generate 356 total daily trips, or 9.15 trips per unit.

*ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 is also substantially similar to the proposed project with respect to traffic impacts, since it would develop only 16 fewer residential units. Accordingly, construction impacts would be less than significant with mitigation measures incorporated, but operational emission of ROG are expected to exceed thresholds. Mitigation measure AQ-1 would be applicable to this alternative, but this mitigation will not reduce impacts to less than significant; therefore, impacts would remain significant and unavoidable.

## NOISE AND VIBRATION (CONSTRUCTION AND OPERATIONAL NOISE)

*ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would not result in substantial construction or operational noise, either because nothing would be constructed on the project site, or because under existing zoning and lot boundaries, only five single-family residences could be constructed. As a category, single-family residences do not generate substantial noise or vibration; rather, they are considered sensitive receptors. Accordingly, Alternative 1's noise or vibration impacts would be expected to be less than significant, either with no development of the property, or with a small number of single-family units.

*ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would follow a similar development plan as the proposed project, but would avoid the vernal pool areas along the subject property's western boundary by removing some residential lots. With 16 fewer single-family units than the proposed project, this alternative would also be expected to generate fewer vehicle trips, and thus slightly less traffic noise than the proposed project. Therefore, project-generated traffic noise would be less than significant.

Removing some residences from the area along the property's western boundary would provide more than 100' of additional setback from the Antelope High School sports field. Because this alternative would expose fewer receptors, noise impacts overall would be slightly less than those generated by the proposed project.<sup>2</sup> The remaining portions of the project would continue to be subject to the noise sources described previously. Mitigation measures would be required as for the proposed project, which would result in less-than-significant noise impacts.

## HYDROLOGY AND DRAINAGE

*ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development or construction of five single-family residences, one per legal lot. No extensive grading would be required; therefore, this

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<sup>2</sup> Id. p. 8 (referring to noise attenuation with distance from the noise source to the receptor).

alternative would not likely affect site drainage or hydrologic processes because all or most of the 128 acres would remain undeveloped. Impacts would be less than significant.

#### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would redesign the subdivision to accommodate the primary natural resources on the project site, including the vernal pools along the west boundary and the seasonal wetland-drainage on the eastern portion of the property. Impacts related to hydrology and drainage would be substantially the same as those discussed for the preferred project and the commercial alternative.

The proposed project's storm water drainage infrastructure, combined with existing storm water drainage capacity, would accommodate runoff from the project; and compliance with the County Stormwater Ordinance and implementation of Low Impact Development Standards would ensure that development would not alter the course of local waterways resulting in substantial erosion or siltation, cause violation of a water quality standard or waste discharge requirement, or result in substantial increases to polluted runoff. Accordingly, impacts would be less than significant.

### BIOLOGICAL RESOURCES

#### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

The No Project/No Development would not eliminate the vernal pools on the property, nor would require the removal of any trees. The Biological Resources section of this document indicates that the vernal pools have been greatly disturbed over time by disking, vehicle travel during the dry season, and past grazing, and do not exhibit great biological value. However, preserving vernal pools, as well as the existing mature oak and willow trees, on the project site is biologically superior to replacing them with suburban development. Development of one residence per existing lot would also likely preserve these resources, since there is sufficient acreage to avoid them on all five lots. Impacts to biological resources would be less than significant.

#### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would preserve biological resources on site to a greater degree than the proposed project, since the vernal pool areas would be avoided and preserved in place. No mitigation for wetland compensation or preservation would be required as the retention of wetlands on the site would be incorporated into the project approval. Furthermore, no impacts to vernal pool associated plant or animal species would occur. Mitigation measures BR-6 through BR-9 would be applicable in order to protect nesting bird habitat and to compensate for the loss of Swainson's hawk foraging habitat. Mitigation for native tree removal would also be expected though, the loss of trees would be reduced given that many of the trees would be located in the preserved areas. With these mitigation measures, impacts to biological resources would be less than significant.

## CLIMATE CHANGE

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development or construction of five single-family residences, one per legal lot. SMAQMD has established an Operational Screening Levels table, which shows the size of development, by land use type, that SMAQMD has determined would not exceed the operational GHG emissions thresholds. Projects that are smaller than those listed in the table are considered to have a less than significant impact related to Climate Change. According to SMAQMD's Operational Screening Levels table, Single Family Housing projects with less than 57 dwelling units are assumed to have GHG emissions that do not exceed thresholds. This alternative would result in the construction of five single-family residences, which is below the 57 unit screening level; therefore, impacts would be less than significant.

### *ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would redesign the subdivision to accommodate the primary natural resources on the project site, including the vernal pools along the west boundary and the seasonal wetland-drainage on the eastern portion of the property. Impacts related to climate change would be substantially the same as those discussed for the preferred project and the commercial alternative. As discussed for the preferred project and the commercial alternative, GHG emissions from the proposed project would not exceed the County's thresholds for energy and mobile source GHG emissions. Therefore, the project would not generate GHG emissions that would have a significant effect on the environment.

## CULTURAL RESOURCES

### *ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development or construction of five single-family residences, one per legal lot. The Cultural Resources Report prepared for the project indicated that there were no known pre-historic or historic resources present on the property, but that hidden resources might emerge with vegetation removal and grading (e.g. artifacts, exotic rock, unusual amounts of shell or bone, or human remains).<sup>3</sup> Alternative 1 would not require a substantial amount of grading, either for "no development" or for the construction of five single-family residences. Therefore, this alternative would not likely affect hidden cultural resources. Because there is a potential to encounter buried or as yet undiscovered resources during any land clearing or construction work, mitigation would be required. Mitigation measure CR-1 would ensure that impacts to historical and archaeological resources are less than significant.

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<sup>3</sup> Peak & Associates, Inc., *Determination of Eligibility and Effect for the Barrett Ranch East Project*, Sacramento County, California, November 2014, pp. 16-17.

*ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

Alternative 2 would redesign the subdivision to accommodate the primary natural resources on the project site, including the vernal pools along the west boundary and the seasonal wetland-drainage on the eastern portion of the property. Like the proposed project, Alternative 2 would still re-grade much of the site to accommodate building pads and street infrastructure. Impacts to unknown/hidden cultural resources would essentially be the same as the proposed project. Mitigation measure CR-1, set forth in the Cultural Resources section of this document, would apply to Alternative 2, including stopping work upon discovery of artifacts or other resources, and notification of the County Coroner if human remains are found. With this mitigation measures in place, impacts to cultural resources from Alternative 2 would be less than significant.

## TOXICS AND HAZARDOUS MATERIALS

*ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT/EXISTING ZONING*

Alternative 1 would result in either no development or construction of five single-family residences, one per legal lot. No routine use, transport or spilling of substantial quantities of hazardous materials would be expected. Moreover, the property is not listed in current hazardous materials sites; additionally, the property would likely remain fenced, restricting vehicle access and consequent illegal dumping. Accordingly, Alternative 1 would not result in impacts associated with hazardous materials.

*ALTERNATIVE 2 – NATURAL RESOURCE PROTECTION*

As with the proposed project, Alternative 2 would not be expected to routinely transport, use, or dispose of hazardous materials. Use of hazardous materials during site preparation and construction would be controlled by existing regulations. Construction emissions would be short-term, and cease once the project is developed. Accordingly, impacts associated with hazardous materials from Alternative 2 are anticipated to be less than significant.

## ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project alternative would be the environmentally superior alternative because it reduces all impacts to less than significant levels. However, since this alternative meets none of the Project Objectives, CEQA requires that another alternative be identified as environmentally superior.

Alternative 2, Natural Resource Preservation, is the environmentally superior alternative because it lessens impacts to the vernal pools on the site. The Natural Resource Preservation alternative would preserve the vernal pools in place with mitigation measures to ensure their sustainability over time. Alternative 2 meets most of the project objectives, while not significantly reducing the number of residential units, nor changing the commercial components of the project.



Although Alternative 2 does not reduce operational air quality impacts or traffic impacts to less than significant, it is likely that any development of the subject property consistent with General Plan and Community Plan land use goals and policies would result in unavoidable operational air quality and transportation impacts, given the constraints of the local and regional road network and existing right-of-ways.