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## 6. ALTERNATIVES ANALYSIS

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### INTRODUCTION

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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 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.” Further, the Guidelines state that “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 15126.6[b]). The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6[f][1]).

CEQA provides the following guidelines 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 §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 §15126.6(b)).
- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. 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 §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 §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 decisionmakers 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 §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 §15126.6(e)(2)).

In addition, Section 15126.6 (d) of the CEQA Guidelines states that “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.”

### **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, the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the Public Resources Code and the CEQA Guidelines direct that the EIR need “set forth only those alternatives necessary to permit a reasoned choice.” The CEQA Guidelines provide 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 (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.

Further, the following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control.<sup>1</sup> 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.<sup>2</sup>

## **ALTERNATIVES CONSIDERED IN PREVIOUS RELATED EIRS**

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### **Clover Valley Lakes Annexation EIR**

The 1995 Clover Valley Lakes Annexation EIR defined a reasonable range of project alternatives and provided a comparative analysis of the merits of each. The alternatives considered in the 1995 Annexation EIR are provided below.

#### Rural Estates

This alternative would provide approximately 139 single-family lots, averaging 3.5 acres in size. The lot size was specifically chosen to encourage residents to retain wooded areas in their natural state. Additionally, the large lot size would greatly reduce the environmental impacts of grading, as the reduction in the number of homes would allow for development in less constrained areas. An eight-acre school site would remain; however, due to the lack of an on-site market, no commercial development would be provided. Although not contained in open space, this alternative would protect the oak woodland and steep slope areas by establishing building sites on flatlands. The riparian open space corridor would remain unchanged, maintaining elements of the visual beauty of Clover Valley. Finally, this alternative would utilize rural subdivision standards including domestic water, septic systems, rural road standards, minimal street drains, no public parks, and roadside ditches/culverts.<sup>3</sup>

#### Estate Subdivision

This alternative would yield approximately 550 single-family lots averaging 30,000 square feet in size. Multi-family housing would not be included in development plans; however, a two-acre site would be developed for commercial use providing for the needs of the 550 residences alone. The eight-acre school site would remain, as well as park and riparian open space. In addition, approximately 90 percent of the wooded hillside habitat would be protected within commonly held open space, precluding development impacts to such habitat.<sup>4</sup>

#### Mixed Residential

This alternative was developed to meet the City of Rocklin's General Plan target for a 75 percent single-family/25 percent multi-family housing mix. The alternative has the same number of dwelling units as proposed under the original plan for the entire annexation area, but contains the following split:

- 244 multi-family units on approximately 17 acres; and
- 730 single-family lots approximately ½ acre in size (on average).

An eight-acre school site would be a part of this alternative, as well as a four-acre commercial site, which would be sized to reflect the market generated by this alternative alone. The riparian corridor and park sites would be held as open space along with approximately 93 percent of the oak-wooded hillsides.<sup>5</sup>

### Findings

The 1995 Clover Valley Lakes Annexation EIR found the environmentally superior alternative was the rural estates design. The rural estates design provided the greatest reduction in the level of environmental impacts to aesthetics, air quality, geology, and transportation. An overall reduction in dwelling units triggers a general decrease in grading, traffic, and air pollution, thus making the rural estates design the environmentally superior alternative.

### **Clover Valley Lakes Large Lot Tentative Map EIR**

The 2002 Clover Valley Lakes Large Lot Tentative Map EIR, which was not certified, defined project alternatives and provided a comparative analysis of the merits of each. In addition to the required No Project Alternative, the 2002 Large Lot Tentative Map EIR included the following alternatives.

#### Clustered Development Alternative

Buildout of the site under this alternative would allow for more open space and less development by creating higher density areas of residential units and structures on predominately flatland area. Development would be carefully planned to avoid steep hillsides and areas with large quantities of trees, which would result in fewer roadways, less grading, and less overall disturbance to the valley.

#### Reduced Density Alternative

Under the Reduced Density Alternative, the project site would be developed with approximately 70 fewer residences than the proposed project. To achieve the reduction of units, some medium density residential properties would be changed to a lower density. All other acreage and buildout assumptions would be the same as the proposed project. This alternative meets the overall project objectives, but under this alternative, 70 fewer units would be developed.

### Findings

Of the alternatives analyzed, the Clustered Development Alternative was determined to provide the greatest reduction in the level of environmental impacts while meeting the overall objectives of the project. Without reducing the number of dwelling units, the Clustered Development Alternative would create more open space by constructing houses in areas of higher densities. By carefully planning development to avoid steep hillsides, oak woodlands, and wetlands, the environmental impacts would decrease due to the

reduction in grading, fewer internal roadways, and habitat destruction. Although impacts to aesthetics and air quality would not alter significantly under the Clustered Development Alternative, the reduction of impacts to geology, biological resources, transportation and circulation made Clustered Development the environmentally superior alternative.

## **ALTERNATIVES CONSIDERED BUT DISMISSED**

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### **Buildout Pursuant to General Plan Alternative**

An alternative resulting in buildout of the site pursuant to the General Plan could result in the development of up to 933 residential units on the project site, thus resulting in increased impacts as compared to the proposed project. A General Plan alternative would not reduce impacts compared to the proposed project and would therefore be an infeasible alternative. The General Plan alternative is therefore dismissed from further consideration in this DEIR.

### **Off-Site Alternative**

An off-site alternative does not exist that would be suitable for the proposed project. One piece of property designated Low Density Residential exists in the Northwest Rocklin Annexation area, but this parcel is not owned or controlled by the applicant. Additionally, the existing owner has expressed interest in pursuing development on the property, resulting in its unavailability for development by the current applicant.

### **Open Space With Some Public/Quasi-Public Uses**

Under this alternative, the project site would remain as open space with some public/quasi-public uses. The site could potentially be used as a preserve, sanctuary, interpretive center, or museum under this alternative. However, this alternative was rejected from further consideration primarily because it does not achieve the vast majority of the stated project objectives. As noted previously, according to the CEQA Guidelines (Section 15126.6[f]), “the EIR need examine in detail only the [alternatives] that the lead agency determined could feasibly attain most of the basic objectives of the project.” Additionally, this alternative would not achieve the objectives of the City’s General Plan, which includes development of the project area.

## **ALTERNATIVES CONSIDERED IN THIS EIR**

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For this EIR, the alternatives considered include the following:

- No Development Alternative;
- Maximum of 180 Units Alternative;
- Elimination of Valley View Parkway Alternative; and
- Elimination of Creekside Development Alternative.

A matrix of the impacts of these alternatives relative to the alternatives of the proposed project is presented in Table 6-1.

### **No Development Alternative**

The No Development Alternative would result in the continued undeveloped condition of the project site. The off-site sewer line extension would not be built under this alternative, and the City of Rocklin would not approve development for the project site. This non-development alternative is characterized primarily by the benefits of continued undeveloped lands in the existing Clover Valley project area. The No Development Alternative would not meet most of the project objectives, with the exception of Project Objective 3, to “preserve Clover Valley Creek and minimize impacts on other significant on-site natural resources [ . . . ].” Under this alternative, impacts would be negligible for most issue areas.

#### Land Use

The Rocklin General Plan designates portions of the project site as Low Density Residential (LDR). The No Development Alternative would not result in the development of LDR housing on the project site, and would thus be inconsistent with the development proposed for the area under General Plan buildout. Additionally, the No Development Alternative would be inconsistent with the General Plan Land Use Element goal of ensuring “sufficient residential development to meet community needs.” The No Development Alternative would also not help to provide “a safe and efficient system of streets,” as stated under the Circulation Element, because the Valley View Parkway extension needed from Park Drive to Sierra College Boulevard would not be built under the No Development Alternative as it would under the proposed project. Therefore, the No Development Alternative would be less consistent with the General Plan than the proposed project. However, because the project site would remain in its existing undeveloped state, compatibility issues with surrounding land uses would not occur, and the type and intensity of uses anticipated under the proposed project would exceed those under the No Development Alternative. Additionally, because the off-site sewer line extension would not be built under this alternative, construction-related land use compatibility impacts would not occur with the No Development Alternative. Overall, land use impacts would thus be roughly balanced under the proposed project as under the No Development Alternative.

#### Aesthetics

At present, the Clover Valley site is an undisturbed and visually natural and attractive area that would remain unchanged under the No Development Alternative. The off-site sewer extension would not be built under this alternative and therefore impacts related to degradation of the visual character of the off-site sewer location (which, although it primarily traverses the existing roadway, would also be constructed near the banks of Antelope Creek) would not occur. Therefore, impacts related to aesthetics would not occur on the No Development Alternative.

### Transportation and Circulation

This alternative would increase impacts related to reduction of emergency access and the loss of the construction of Valley View Parkway as an east-west connector. Exhibit A of the North Rocklin Circulation Element Amendment (GPA-93-03) includes "Improvement 9," which is a State Route 65 to Sierra College Boulevard connection. This connection is described and shown in Figure 13 of the Rocklin General Plan (p. 73) as traversing through the Clover Valley property. The No Development Alternative would not provide this connection. While the proposed project would generate 5,022 daily trips, the No Development Alternative would not generate any vehicle trips and would eliminate the need for construction of roadways within the project site and expansion of surrounding roadways to accommodate new and increased traffic resulting from buildout of the project site. In addition, this alternative would not cause traffic disturbances that could result from the construction of the off-site sewer line, which would run under existing roadways. Therefore, the No Development Alternative would result in fewer impacts to transportation and circulation as a result of fewer trips generated than the proposed Clover Valley project.

### Air Quality

Under the No Development Alternative existing air quality conditions would remain because the project site would not experience increased levels of emissions from construction, residential uses, and motor vehicles, and the off-site sewer location would not experience construction-related emissions. Therefore, the No Development Alternative would not result in impacts to air quality.

### Noise

The No Development Alternative would eliminate potential noise impacts to nearby sensitive receptors that would occur with the construction of the proposed project and the off-site sewer line extension. Therefore, the No Development Alternative would not result in impacts related to noise.

### Cultural and Paleontological Resources

Under the No Development Alternative, the cultural resources on the project site would not have a protection plan as would be required under the proposed project. However, the Clover Valley area is private property, and public compliance with the law must be assumed. This alternative would allow cultural and paleontological resources to remain in their existing state on the project site and at the off-site sewer line locations. Additionally, the No Development Alternative would not result in construction impacts to cultural or paleontological resources on the project site or at the off-site sewer line locations. Therefore, the No Development Alternative would not result in impacts to cultural and paleontological resources.



### Biological Resources

The No Development Alternative would not impact the on-site or off-site natural communities and wildlife habitat, including grasslands, wetlands, and woodlands. The No Development Alternative would therefore not result in impacts to biological resources.

### Geology

The No Development Alternative would eliminate grading and construction impacts associated with construction of the proposed Clover Valley project, and the project site and off-site sewer line locations would remain in their current state. Therefore, no impacts would occur related to geology under this alternative.

### Hazards

The Phase I performed for the proposed project identified hazards such as miscellaneous debris, wells, mines, and a septic system. Unlike the proposed project, the No Development Alternative does not include development of uses that would be occupied by sensitive receptors, such as residents. Therefore, under this alternative, sensitive uses would not be exposed to these hazards.

### Hydrology and Water Quality

Under the No Development Alternative, the current stormflow and water quality characteristics of the Clover Valley Creek watershed would remain unchanged, and no impacts would occur due to grading and erosion, construction, the addition of impervious surfaces to the site, and creek flows downstream of the proposed creek crossings, as under the proposed project. This alternative would not result in water quality impacts due to the off-site sewer line extension. Therefore, the No Development Alternative would not result in impacts to hydrology and water quality.

### Public Services and Utilities

The No Development Alternative would not result in added demands to public services and utilities such as water supply, wastewater, stormwater, schools, libraries, gas and electric energy, and fire and police protection services. Additionally, the reconstruction of the sewer line, which would be necessary to accommodate the proposed project, would not be necessary under the No Development Alternative. Therefore, public services and utilities impacts would not occur with the No Development Alternative.

### **Maximum of 180 Units Alternative**

The Maximum of 180 Units Alternative would result in the buildout of up to 180 units on the project site. This alternative was developed in order to reduce the impacts associated with the construction of an off-site sewer line, which would be required to provide adequate capacity should the project be built with more than 180 units. Current collection

capacity for the sewer line allows up to 180 more units without improvements to the line; more than 180 units would require an increase in the size of the sewer pipe. The specific units that would be eliminated under this alternative could be selected to avoid riparian habitat along the creek, to preserve more cultural resources, and to avoid other environmental impacts identified in specific areas of the project site. However, for the purposes of this alternatives analysis, the specific units that would be eliminated have not been chosen, in an effort to maintain future flexibility of elimination options.

This alternative would meet most of the objectives of the project, but would not be as economically viable for the project proponent due to the reduced number of units.

### Land Use

The Maximum of 180 Units Alternative would include development within the project area, but would allow only 180 units maximum to be built out, rather than the 558 units proposed by the applicant. The Maximum of 180 Units Alternative would presumably support the Open Space, Conservation and Recreation Element goal of protecting and conserving “natural resources [and] open space” to a greater extent than the proposed project if the lot sizes remained the same under this alternative (General Plan, p. 8). This alternative would not develop the project site according to the General Plan or zoning designations for the site. Under the Maximum of 180 Units Alternative, the number of residences, and thus intensity of land uses, would decrease. Additionally, because the off-site sewer line extension would not be built under this alternative, construction-related land use compatibility impacts would not occur with the No Development Alternative. Therefore, the Maximum of 180 Units Alternative would have fewer land use impacts as the proposed project.

### Aesthetics

The Maximum of 180 Units Alternative would alter the visual resource of Clover Valley from an area featuring grasslands, wetlands, and wooded hillsides, to a residential development characterized by homes and roadway infrastructures. However, the elimination of 378 homes from the project site would result in reduced adverse visual impacts due to the lesser amount of area developed. The off-site sewer extension would not be built under this alternative and therefore impacts related to degradation of the visual character of the off-site sewer location would not occur. Therefore, this alternative would result in fewer aesthetic impacts than the proposed project. Cumulative impacts, however, would remain significant and unavoidable due to the conversion of much of the site, in addition to other project sites in the area, to urban uses.

### Transportation and Circulation

With 378 fewer residential units, the Maximum of 180 Units Alternative would reduce the number of projected daily trips, thereby reducing the transportation and circulation impacts. Therefore, although development of major roadway infrastructure would not be modified, the trip generation impacts created by the Maximum of 180 Units Alternative

would be fewer compared to the proposed project. In addition, this alternative would not cause traffic disturbances that could result from the construction of the off-site sewer line. In combination with other projects in the area, however, the alternative would result in cumulative impacts approximately equivalent to the proposed project.

### Air Quality

The overall impact to air quality would be substantially reduced under the Maximum of 180 Units Alternative. Pollutants generated by construction and grading would decrease as fewer residential units would be added to the project site, and emissions from mobile sources and project operations would also decrease. Because the off-site sewer line would not be built under this alternative, construction-related emissions due to the off-site sewer line would not occur. Therefore, the Maximum of 180 Units Alternative would result in fewer air quality impacts than the proposed project. Cumulative impacts, however, would remain significant and unavoidable.

### Noise

The Maximum of 180 Units Alternative would result in the construction of 378 fewer residences. Because of reduced grading and construction under this alternative, including elimination of noise impacts resulting from the construction of off-site sewer line, noise impacts would be reduced. Further noise reduction would occur as a result of the fewer vehicle trips generated by residents and construction workers traveling to and from the project site and off-site sewer line locations. Similar to the air quality analysis above, impacts to noise would be reduced both from operational and construction sources under this alternative as compared to the proposed project, but cumulative impacts would remain significant and unavoidable.

### Cultural and Paleontological Resources

The Maximum of 180 Units Alternative would eliminate construction of the off-site sewer line as well as grading of at least 378 lots compared to the proposed project, and, as noted previously, lots could be selected for elimination based on their impacts to cultural resources. Additionally, the smaller number of residents introduced to the Clover Valley area would reduce impacts associated with incidental discovery of cultural and paleontological resources. Therefore, this alternative would result in fewer impacts to cultural and paleontological resources than the proposed project. However, in combination with other projects in the area, the alternative would result in similar cumulative impacts as the proposed project.

### Biological Resources

The Maximum of 180 Units Alternative would reduce the total amount of residential units on the project site, as well as the off-site sewer extension. This alternative would reduce the area graded for development because of the elimination of 378 residential units and the off-site sewer extension, resulting in the preservation of the 378 residential

lots as open space. The lots to be eliminated could be selected based on their impacts to biological resources. For example, lots that are closer to Clover Valley Creek that would impact riparian habitat could be eliminated, and lots that would impact more oak trees than others lots could be eliminated. Therefore, the Maximum of 180 Units Alternative would reduce biological impacts as compared to the proposed project. However, this alternative would still result in significant and unavoidable cumulative impacts to biological resources as a result of the substantial residential development and conversion of some undeveloped areas to urban uses. Construction impacts would also be reduced, but would still include the potential loss of wildlife and vegetation. The Maximum of 180 Units Alternative would thus result in fewer impacts to biological resources than the proposed project.

### Geology

The Maximum of 180 Units Alternative would reduce impacts to the geology of the project site, as development would require less surface grading, cuts, and fills associated with buildout of the proposed project. This alternative would not result in the installation of the off-site sewer, thus avoiding potential impacts related to grading and slope stability, blasting, soil erosion, and seepage. Cumulative impacts would remain similar to the proposed project due to the introduction of people and structures to possible exposure to seismic hazards.

### Hazards

The Phase I performed for the proposed project identified hazards such as miscellaneous debris, wells, mines, and a septic system. Like the proposed project, the Maximum of 180 Units Alternative includes construction of residential uses. Construction of residential uses on the project site could potentially expose residents to the aforementioned hazards. However, fewer residents would be exposed to these hazards under this alternative. Off-site sewer hazard impacts are not expected to occur with the proposed project, so this alternative would not reduce hazard impacts in this regard. Overall, the Maximum of 180 Units Alternative would result in fewer project-specific impacts associated with hazards and hazardous materials compared to the proposed project, but similar cumulative impacts when the alternative is considered in combination with other projects in the area.

### Hydrology and Water Quality

Under the Maximum of 180 Units Alternative, the project site would be developed with 378 fewer residences, and would therefore be characterized by fewer impervious surfaces (roofs and paved areas). As a result, the amount of stormwater runoff attributed to these surfaces would be reduced as well, consequently reducing the need for the level of drainage provisions set forth by the proposed project. This alternative would also not result in water quality impacts due to the off-site sewer line extension. However, in combination with other projects in the area, the alternative would result in similar cumulative impacts to hydrology and water quality.

### Public Services and Utilities

Because the project site currently consists of undeveloped land, the Maximum of 180 Units Alternative would require services where none are currently needed. These services would include but not be limited to, water, wastewater, and stormwater infrastructure as well as fire and police protection services. However, due to the reduced number of housing units, the Maximum of 180 Units Alternative would require a reduced amount of public services compared to the proposed project. Additionally, the reconstruction of the sewer line in order to accommodate the proposed project would not be necessary under the Maximum of 180 Units Alternative. Therefore, the development of the Maximum of 180 Units Alternative would reduce the public services and utilities impacts as compared to the impacts that would be generated from the development of the proposed project, and cumulative impacts would also be reduced.

### **Elimination of Valley View Parkway Alternative**

Under this alternative, a portion of Valley View Parkway would be eliminated in order to reduce traffic, grading, erosion, and biological impacts. For this alternative, the minimum range of Valley View Parkway that could be eliminated would be the portion of Valley View Parkway crossing the creek. The longest amount of Valley View Parkway that could be eliminated under this alternative would include the elimination of Valley View at its northern end immediately west of Lot 142 to its southern end immediately east of Lot 314. In any iteration, this alternative would eliminate the proposed Valley View Parkway's crossing over Clover Valley Creek. This alternative was designed to eliminate cut-through traffic from Sierra College Boulevard, reduce cut and fill impacts, increase the conservation of trees, and reduce impacts to wildlife and hydrological issues due to the resultant elimination of the Valley View Parkway creek crossing.

### Land Use

The Elimination of Valley View Parkway Alternative would include development of the same type and intensity as the proposed project, with the exception of an unspecified segment of Valley View Parkway, including where Valley View Parkway is proposed to cross the creek. The Elimination of Valley View Parkway Alternative would support the Open Space, Conservation and Recreation Element goal of protecting and conserving "natural resources [and] open space" insofar as this alternative would protect any alteration of Clover Valley Creek. However, the Elimination of Valley View Parkway Alternative would result in less connectivity between neighborhoods in the project area, and would thus not support the Circulation Element Goal #21 of "encourag[ing] the design of streets that connect neighborhoods for vehicular and pedestrian use and for the efficient movement of service and emergency vehicles" (General Plan, p. 12). Additionally, because vehicles would be unable to travel across Clover Valley Creek, residential units on the eastern side of Clover Valley Creek would have only one point of access; therefore, the project would not adhere to the Community Safety goal "to require projects to be designed with at least two points of access for emergency" (p. 14). Because this alternative includes the off-site sewer line extension, it would result in the same land

use compatibility impacts from the sewer extension as the proposed project. The Elimination of Valley View Parkway Alternative would therefore have slightly greater land use impacts than the proposed project.

### Aesthetics

The Elimination of Valley View Parkway Alternative, similar to the proposed project, would alter the visual resources of much of the proposed project site from an area featuring grassland, oak woodland, riparian wetland, and seasonal wetland, to a residential development characterized by homes and roadway infrastructure. The Elimination of Valley View Parkway Alternative would include development of the same type and intensity as the proposed project, with the exception of the creek crossing and an unspecified segment of Valley View Parkway. Because the crossing could adversely impact the aesthetic quality of the natural environment, and because grading and tree removal would be reduced under this alternative, the Elimination of Valley View Parkway Alternative would result in fewer aesthetic impacts than the proposed project. Aesthetics impacts as a result of the off-site sewer line would remain the same, however. Project-specific impacts related to aesthetic resources would thus be fewer under this alternative than under the proposed project, although the overall cumulative impacts of this alternative in addition to other projects in the area would remain significant and unavoidable.

### Transportation and Circulation

The Elimination of Valley View Parkway Alternative would include the same roadways and infrastructure as the proposed project, with the exception of a segment of unspecified length of Valley View Parkway. With the loss of the east-west connection through the northern end of the project site, the Elimination of Valley View Parkway Alternative would decrease the amount of cut-through traffic through Clover Valley and possibly the number of projected daily trips and traffic in the project area, as well as have a reduced effect on adjacent intersections compared to the proposed project. However, the loss of connection could potentially result in increased traffic on roadways west of the project site, as well as result in decreased emergency vehicle access. This alternative would include the off-site sewer line extension and would thus result in the same traffic-related impacts from the sewer extension as the proposed project. Therefore, overall project-specific and cumulative impacts to transportation and circulation would remain roughly equivalent under this alternative as under the proposed project.

### Air Quality

The Elimination of Valley View Parkway Alternative would result in the development of the proposed project, with the exception of portions of Valley View Parkway, including the crossing over Clover Valley Creek. Because construction of the crossing and segments of Valley View Parkway could have short-term air quality impacts, the Elimination of Valley View Parkway Alternative would have fewer air quality impacts than the proposed project. Pollutants generated by construction of the Elimination of

Valley View Parkway Alternative would decrease given the smaller amount of land and reduced roadway and bridge under construction. Emissions from mobile sources and project operations could potentially decrease due to the likely reduction of cut-through traffic. However, this potential decrease could be offset by longer vehicle trips because of a lack of a connection from Park Drive to Sierra College Boulevard. Air quality impacts from construction of the off-site sewer would remain the same. Cumulative air quality impacts would remain significant and unavoidable under the Elimination of Valley View Parkway Alternative compared to the proposed project.

### Noise

Short-term noise impacts associated with construction of the creek crossing and segments of Valley View Parkway under the proposed project would not occur under the Elimination of Valley View Parkway Alternative. Therefore, the Elimination of Valley View Parkway Alternative would result in slightly decreased temporary construction noise. The Elimination of Valley View Parkway Alternative would also result in fewer operational impacts as a result of vehicle noise due to potential decrease in cut-through traffic using Valley View Parkway. The noise impacts expected under this alternative would thus be fewer than those created by the proposed project, except noise impacts from construction of the off-site sewer, which would remain the same. However, the cumulative noise impacts are anticipated to be roughly the same, remaining significant and unavoidable.

### Cultural and Paleontological Resources

Cultural resources are often found in streambeds and flood plains as the water flow carries and deposits the resources. Therefore, the elimination of the construction of the bridge under this alternative could reduce impacts to cultural resources. The Elimination of Valley View Parkway Alternative would also result in development of less acreage for roadways, which would therefore decrease the potential for impacts to historical and cultural resources. However, this alternative would still result in potential impacts to cultural resources because such resources are known to occur on the project site, and potential construction impacts to previously undiscovered paleontological resources would still occur under this alternative. In addition, impacts to cultural and paleontological resources from the off-site sewer extension would remain the same as under the proposed project. The project-specific impacts expected under this alternative are therefore anticipated to be less than those created by the proposed project, but the overall cumulative impacts would remain the same under the alternative.

### Biological Resources

The Elimination of Valley View Parkway Alternative would result in the development of the proposed project, with the exception of the bridge and an unspecified portion of Valley View Parkway. Because the bridge would likely cause impacts to biological resources – including wetland habitat over Clover Valley Creek – water quality impacts during construction, as well as operational impacts to water levels during flood events,

the Elimination of Valley View Parkway Alternative would have fewer impacts to biological resources than the proposed project. The loss of native oak trees, and potential impacts to special-status species and wildlife habitat would be reduced with the Elimination of Valley View Parkway Alternative because this alternative would reduce the amount of roadway construction which requires tree removal; therefore, fewer impacts to oak woodlands and other wildlife habitat would occur with this alternative. However, impacts to biological resources from the off-site sewer extension would remain the same under this alternative. Project-specific impacts would thus be reduced under this alternative as opposed to the proposed project, but overall cumulative impacts would likely be similar due to the same type and intensity of residential development, and the similar construction of other roadways and infrastructure in the project area.

### Geology

Because the creek crossing would not be constructed under the Elimination of Valley View Parkway Alternative, geological impacts which could result from construction of the bridge would not occur. This alternative would not include the bridge and a segment of Valley View Parkway. In addition, although development under this alternative would require surface grading, cuts, and fills associated with the buildout of homes and related infrastructure (aside from the bridge and segment of Valley View Parkway mentioned above), this alternative would require less grading due to the reduction of roadway construction for Valley View Parkway. This alternative would include the off-site sewer extension and would thus result in the same geological impacts as a result of the construction of the sewer line as the proposed project. Overall, the Elimination of Valley View Parkway Alternative would result in fewer impacts related to geologic features than the proposed project, although cumulative impacts would remain similar due to the addition of residents exposed to geological impacts in conjunction with other projects in the area.

### Hazards

Impacts to hazards as a result of the off-site sewer line would remain the same under this alternative as under the proposed project. The Phase I performed for the proposed project identified hazards such as miscellaneous debris, on-site wells, mines, and a septic system. The Elimination of Valley View Parkway Alternative includes construction of residential uses of the same type and intensity as the proposed project. Construction of residential uses on the project site could potentially expose residents to the aforementioned hazards. Therefore, the Elimination of Valley View Parkway Alternative would result in similar project-specific and cumulative impacts associated with hazards and hazardous materials compared to the proposed project.

### Hydrology and Water Quality

Because this alternative would include the off-site sewer line extension, hydrological impacts resulting from the sewer line would remain the same under this alternative as under the proposed project. The Elimination of Valley View Parkway Alternative would



not include a bridge over Clover Valley Creek. Because the bridge could affect water quality as well as water levels downstream of the bridge during a storm event, the Elimination of Valley View Parkway Alternative would have fewer impacts associated with hydrology and water quality than the proposed project. Under the Elimination of Valley View Parkway Alternative, the project site would be developed with less roadway infrastructure. Therefore, this Alternative would result in fewer impervious surfaces such as pavement. As a result, the amount of stormwater runoff attributed to these surfaces would be less than the proposed project and require a lesser need for the level of drainage provisions set forth by the proposed project. Therefore, the Elimination of Valley View Parkway Alternative would result in fewer project-specific and cumulative impacts to hydrology and water quality compared to the proposed project.

### Public Services and Utilities

This alternative would include over 180 housing units, necessitating the off-site sewer line extension. Because the project site currently consists of undeveloped land, the Elimination of Valley View Parkway Alternative would require services where none are currently needed. These services would include but not be limited to, water, wastewater, and stormwater infrastructure as well as fire and police protection services. Due to the loss of a connection between Sierra College Boulevard and Park Drive via Valley View Parkway, the Elimination of Valley View Parkway Alternative would result in reduced emergency access and therefore inadequate fire and police protection. Therefore, the development of the Elimination of Valley View Parkway Alternative would increase the project-specific and cumulative public services and utilities impacts as compared to the impacts that would be generated from the development of the proposed project.

### **Elimination of Creekside Development Alternative**

Under this alternative, development adjacent to Clover Valley Creek would be eliminated, with a buffer zone of 75 feet as recommended by National Oceanic & Atmospheric Administration (NOAA) Fisheries. This alternative was developed as a result of a Biological Opinion received from NOAA Fisheries. Eliminating creekside development, which currently is proposed in most locations at a minimum distance of 50 feet away from the creek would reduce impacts to plant and wildlife which typically occur in close proximity to watercourses, and reduce risk of flooding and erosion impacts which lead to degradation of water quality. This alternative would result in the elimination of approximately 60 lots.

### Land Use

The Elimination of Creekside Development Alternative would eliminate residential development adjacent to Clover Valley Creek. The Elimination of Creekside Development Alternative would support the Open Space, Conservation and Recreation Element goal of protecting and conserving “natural resources [and] open space” insofar as this alternative would protect natural plant and wildlife habitat adjacent to Clover

Valley Creek. This alternative would also support the following Open Space, Conservation and Recreation Element policies (General Plan, pp. 9-10):

- #1: To encourage the protection of natural resource areas, scenic areas, hilltops, open space areas and parks from encroachment or destruction by incompatible development through the use of conservation easements, buffers, set-backs or other measures.
- #2: To encourage the protection of wetlands, vernal pools, and rare, threatened and endangered species of both plants and animals through either avoidance of these resources or implementation of appropriate mitigation measures [ . . . ].
- #4: To encourage the protection of oak trees, including heritage oaks, and other significant vegetation from destruction.
- #15: To provide adequate yard areas and building setbacks from creeks, riparian habitat, hilltops, and other natural resources.
- #18: To promote, where appropriate, the joint use of streams for flood control, open space, conservation of natural resources, and limited recreation.
- #19: To minimize the degradation of water quality through requiring implementation of techniques such as, but not limited to, the prohibition of grading, placement of fill or trash or alteration to vegetation within designated stream setback buffer areas, and requiring the installation of measures which minimize runoff waters containing pollutants and sediments from entering surface waters.

On the other hand, this alternative would not result in the level of development anticipated by the General Plan. In addition, because this alternative includes the off-site sewer line extension, it would result in the same land use compatibility impacts from the sewer extension as the proposed project. The Elimination of Creekside Development Alternative would therefore have some impacts related to consistency with the General Plan, but land use impacts would be reduced with this alternative due to the reduction of the intensity of uses.

### Aesthetics

The Elimination of Creekside Development Alternative, similar to the proposed project, would alter the visual resources of much of the proposed project site from an area featuring grasslands, wetlands, and woodlands to a residential development characterized by homes and roadway infrastructure. However, the alternative would do this to a lesser extent than the proposed project. Because the creekside residences could adversely impact the viewshed along the creek, and because grading and tree removal would be reduced under this alternative, the Elimination of Creekside Development Alternative would result in fewer aesthetic impacts than the proposed project. Aesthetics impacts as a result of the off-site sewer line would remain the same, however. Project-specific impacts related to aesthetic resources would thus be fewer under this alternative than under the proposed project, although the overall cumulative impacts of this alternative with other projects in the area would remain significant and unavoidable.

### Transportation and Circulation

The Elimination of Creekside Development Alternative would include the same roadways and infrastructure as the proposed project. The Elimination of Creekside Development Alternative would decrease the number of trips generated compared to the

proposed project due to the reduced number of homes that would be constructed under this alternative. This alternative would include the off-site sewer line extension and would thus result in the same traffic-related impacts from the sewer extension as the proposed project. Overall, project-specific impacts to transportation and circulation would be reduced under this alternative as compared to the proposed project, although cumulative impacts would remain roughly the same.

### Air Quality

The Elimination of Creekside Development Alternative would result in the development of the proposed project, with the exception of any development adjacent to Clover Valley Creek. Because construction of urban development adjacent to Clover Valley Creek could have short-term air quality impacts, the Elimination of Creekside Development Alternative would have fewer air quality impacts than the proposed project. Construction pollutants generated by the Elimination of Creekside Development Alternative would decrease given the smaller amount of land under construction. Emissions from mobile sources and project operations would also decrease due to the reduction of trips from the reduced number of introduced residents. Air quality impacts from construction of the off-site sewer would remain the same. Cumulative air quality impacts would, however, remain significant and unavoidable under the Elimination of Creekside Development Alternative compared to the proposed project.

### Noise

Short-term noise impacts associated with construction contiguous to Clover Valley Creek under the proposed project would not occur under the Elimination of Creekside Development Alternative. Therefore, this alternative would result in decreased temporary construction noise. The Elimination of Creekside Development Alternative would also result in fewer operational impacts as a result of vehicle noise due to the reduced number of vehicles on the roadways resulting from the fewer number of introduced residents to the project site. Noise impacts from construction of the off-site sewer would remain the same. The project-specific noise impacts expected under this alternative would thus be fewer than those created by the proposed project, but the cumulative noise impacts in combination with other projects in the area would be similar.

### Cultural and Paleontological Resources

Cultural resources are often found in streambeds and flood plains as the water flow carries and deposits the resources. Therefore, the elimination of construction adjacent to the creek under this alternative could reduce impacts to cultural resources. The Elimination of Creekside Development Alternative would also result in development of less acreage for roadways, which would therefore decrease the potential for impacts to historical and cultural resources. However, this alternative could still result in potential impacts to cultural resources because such resources are known to occur on the project site. Construction-related impacts to paleontological resources could also potentially occur this alternative. In addition, impacts to cultural and paleontological resources from

the off-site sewer extension would remain the same as under the proposed project. The project-specific impacts expected under this alternative are anticipated to be less than those created by the proposed project, but the overall cumulative impacts would remain similar under the alternative.

### Biological Resources

The Elimination of Creekside Development Alternative would result in the elimination of development adjacent to Clover Valley Creek. Because creekside development would likely cause impacts to biological resources including riparian habitat, water quality impacts during construction, as well as operational impacts to water levels during flood events, the Elimination of Creekside Development Alternative would have fewer impacts to biological resources than the proposed project. The loss of native oak trees, and potential impacts to special-status species and wildlife habitat would be reduced with this alternative because it would reduce the amount of pad construction which requires tree removal; therefore, fewer impacts to oak woodlands and other wildlife habitat would occur with this alternative. However, impacts to biological resources from the off-site sewer extension would remain the same under this alternative. Project-specific impacts would thus be reduced under this alternative as opposed to the proposed project, but overall cumulative impacts would likely be similar due to the same type and intensity of residential development and the similar construction of other roadways and infrastructure in the project area.

### Geology

This alternative would include the off-site sewer extension and would thus result in the same geological impacts as a result of the construction of the sewer line as the proposed project. Although development under this alternative would require surface grading, cuts, and fills associated with the buildout of homes and related infrastructure, this alternative would require less grading due to the reduction of pad construction. Therefore, the Elimination of Creekside Development Alternative would result in fewer impacts related to geologic features than the proposed project, although cumulative impacts would remain similar due to the addition of residents exposed to geological impacts in conjunction with other projects in the area.

### Hazards

Impacts to hazards as a result of the off-site sewer line would remain the same under this alternative as under the proposed project. This alternative would not include the construction of homes adjacent to the creek where the greatest potential of flooding exists. In addition, the Phase I performed for the proposed project identified hazards such as miscellaneous debris, on-site wells, and a septic system. The Elimination of Creekside Development Alternative includes construction of residential uses of the same type and intensity as the proposed project. Construction of residential uses on the project site could potentially expose residents to the aforementioned hazards. However, because fewer residents would be exposed to these hazards, the impacts would be reduced. The

Elimination of Valley Creekside Development Alternative would result in fewer project-specific impacts associated with hazards and hazardous materials compared to the proposed project, but similar cumulative impacts in conjunction with the buildout of other projects in the area.

### Hydrology and Water Quality

Because the Elimination of Creekside Development Alternative would include the off-site sewer line extension, hydrological impacts resulting from the sewer line would remain the same under this alternative as under the proposed project. This alternative would eliminate development adjacent to Clover Valley Creek. Because development adjacent to the creek could affect water quality as well as water levels downstream of the bridge during a storm event, the Elimination of Creekside Development Alternative would have fewer impacts associated with hydrology and water quality than the proposed project. Under the Elimination of Creekside Development Alternative, the project site would be developed with fewer residences; therefore, this Alternative would result in fewer impervious surfaces such as pavement and roofing. As a result, the amount of stormwater runoff attributed to these surfaces would be less than the proposed project and require a lesser need for the level of drainage provisions set forth by the proposed project. The Elimination of Creekside Development Alternative would thus result in fewer project-specific and cumulative impacts to hydrology and water quality compared to the proposed project.

### Public Services and Utilities

This alternative would include over 180 housing units, necessitating the off-site sewer line extension. Because the project site currently consists of undeveloped land, the Elimination of Creekside Development Alternative would require services where none are currently needed. These services would include but not be limited to, water, wastewater, and stormwater infrastructure as well as fire and police protection services. However, the reduction in the number of residential units resulting from this alternative would also reduce infrastructure needs, including a reduction in the amount of water supply, wastewater collection and treatment, fire and police protection services, and school and library services needed. Therefore, the development of the Elimination of Creekside Development Alternative would decrease the project-specific public services and utilities impacts as compared to the impacts that would be generated from the development of the proposed project. However, in conjunction with other development in the area, the alternative would result in similar cumulative impacts to public services and facilities.

**Table 6-1  
 Environmental Impacts of Proposed Project and Project Alternatives**

	<b>Proposed Project</b>	<b>No Development Alternative</b>	<b>Maximum of 180 Units Alternative</b>	<b>Elimination of Valley View Parkway Alternative</b>	<b>Elimination of Creekside Development Alternative</b>
<b>Land Use</b>	Less-Than-Significant	Equal	Fewer	More	Fewer
<b>Aesthetics</b>	Significant and Unavoidable	None	Fewer	Fewer	Fewer
<b>Transportation and Circulation</b>	Significant and Unavoidable	Equal	Fewer	Equal	Fewer
<b>Air Quality</b>	Significant and Unavoidable	None	Fewer	Equal	Fewer
<b>Noise</b>	Significant and Unavoidable	None	Fewer	Fewer	Fewer
<b>Cultural Resources</b>	Less-Than-Significant with Mitigation	None	Fewer	Fewer	Fewer
<b>Biological Resources</b>	Significant and Unavoidable	None	Fewer	Fewer	Fewer
<b>Geology</b>	Significant and Unavoidable	None	Fewer	Fewer	Fewer
<b>Hazards</b>	Less-Than-Significant with Mitigation	None	Fewer	Equal	Fewer
<b>Hydrology and Water Quality</b>	Less-Than-Significant with Mitigation	None	Fewer	Fewer	Fewer
<b>Public Services and Utilities</b>	Less-Than-Significant with Mitigation	None	Fewer	More	Fewer
None = No impacts Fewer = Fewer than proposed project Equal = Equal to proposed project More = More than proposed project					

## **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

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In addition to the discussion and comparison of impacts of the alternatives to the proposed project, CEQA requires that an “environmentally superior” alternative be selected and the reasons for such selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least adverse impacts. CEQA requires that if the No Project Alternative is the environmentally superior alternative, an additional alternative that is environmentally superior must be identified.

Finally, it should be noted that environmental considerations are one portion of the factors that must be considered by the public and the decision makers in deliberations on the proposed project and the alternatives. Other factors of importance include urban design, economics, social factors, and fiscal considerations.

The environmentally superior alternative must reduce the overall impact of the proposed project on the project site. The No Development alternative would eliminate all projected impacts to aesthetics, air quality, noise, biological resources, geology, hazards, hydrology and water quality, and public services and utilities, and would reduce impacts associated with cultural resources; however, CEQA does not allow this alternative to be identified as the environmentally superior alternative.

Of the alternatives analyzed, the Maximum of 180 Units Alternative provides the greatest reduction in the level of environmental impacts while meeting the overall objectives of the project, such as being compatible with existing nearby neighborhoods, preserving Clover Valley Creek, minimizing impacts to cultural resources and other on-site natural resources through appropriate project design, creating a place to live that enhances neighborhoods by providing natural areas through the development and access to the natural areas through visual and pedestrian links, and constructing the General Plan roadways approved as part of the 1995 Clover Valley Annexation EIR project.

The off-site sewer line extension would not be constructed and fewer housing units would be constructed under this alternative, generating fewer impacts to land use, aesthetics, transportation, air quality, noise, cultural and paleontological resources, biological resources, geology, hazards, hydrology and water quality, and public services and utilities. The Maximum of 180 Units Alternative meets most of the project objectives, albeit with a reduced number of dwelling units which may not be as economically viable for the project applicant, while reducing nearly all environmental impacts. In addition, the Maximum of 180 Units Alternative supports General Plan goals, such as the Land Use Element goal to “protect, and provide land to ensure sufficient residential development to meet community need”; the Open Space, Conservation and Recreation Element goal to “protect, and conserve natural resources, open space, and recreation lands in the City; and provide opportunities for recreational activities to meet citizen needs”; the Circulation Element goal to “provide and maintain a safe and efficient system of streets, highways, and public transportation to meet community needs and promote sound land use”; the Community Safety Element goal to “minimize the danger of natural and man-made hazards and to protect residents and visitors from the dangers of

earthquake, fire, flood, other natural disasters, and man-made dangers”; and the Public Services and Facilities goal to “ensure that adequate public services and facilities are provided to meet the needs of residents of the City.” Therefore, the Maximum of 180 Units Alternative is the environmentally superior alternative.

## **Endnotes**

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<sup>1</sup> State of California, CEQA Guidelines, Section 15126.6(f)(1)

<sup>2</sup> State of California, CEQA Guidelines, Section 15126.6(f)(3)

<sup>3</sup> 1995 Clover Valley Lakes Annexation EIR, Chapter DD Alternatives, p. DD-7

<sup>4</sup> 1995 Annexation EIR, p. DD-10

<sup>5</sup> 1995 Annexation EIR, p. DD-14