Chapter 4
Alternatives Analysis

4.1 Alternatives Overview

The California Environmental Policy Act (CEQA) requires that an environmental impact report (EIR) contain a reasonable range of feasible alternatives that meet most or all project objectives while reducing or avoiding one or more significant impacts of the project. According to State CEQA Guidelines Section 15126.6(f), the range of alternatives required in an EIR is governed by a "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice.

The discussion of alternatives must "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." Where a potential alternative was examined but not chosen as one of the range of alternatives, the State CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed. In addition to a range of alternatives, the EIR must discuss the "No-Project Alternative," which describes the reasonably foreseeable probable future conditions if the project is not approved (State CEQA Guidelines, Section 15126.6).

The lead agency must consider the alternatives discussed in an EIR before acting on a project. The agency is not required to adopt an alternative that may have environmental advantages over the project if specific economic, social, or other conditions make the alternative infeasible (Public Resources Code [PRC] Section 21002).

This chapter describes the alternatives to the proposed project and compares the anticipated environmental impacts of the alternatives to those of the proposed project, analyzed in Chapter 3, *Impact Analysis*, Sections 3.1 through 3.14.

4.2 Alternatives Development

4.2.1 Methods and Screening Criteria

Alternative screening criteria included the following.

- **Adherence to project objectives.** The extent to which an alternative fulfills the project's objectives.
- **Impact avoidance.** The extent to which an alternative substantially avoids, minimizes, reduces or eliminates an impact.
- **Feasibility.** The extent to which an alternative is potentially capable of being accomplished given economic, environmental, legal, social, and technological factors.

Through this screening process, alternatives were considered and included for further analysis in the Draft EIR or removed from further consideration. Those alternatives that meet the project objectives, that appear feasible, and that would reduce one or more project impacts are discussed in

greater detail in Section 4.3, *Alternatives Analysis*. Those alternatives that were considered but removed from further consideration are described below under Section 4.5, *Alternatives Considered but Dismissed from Further Analysis in the EIR*.

Ability to Meet Project Objectives

El Dorado County's (County's) objective for the proposed project, as described in Chapter 2, *Project Description*, is to create development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community. Additional objectives of the proposed project, as identified by the project applicant, are as follows.

- **Curtail suburban sprawl.** Curtail suburban sprawl (El Dorado County General Plan [County General Plan] Goal 2.1) by utilizing undeveloped infill sites and promoting development patterns that accommodate the County's future population growth and support economic expansion. Development already exists north and east of the project site, and is proposed to the west.
- **Broaden the housing stock in the El Dorado Hills and Cameron Park communities.** Maximize opportunities for housing by offering opportunities for varying single-family detached dwelling types and sizes. Offer land uses to accommodate various lot sizes, densities, and product types to satisfy the market demands of existing and future household types, sizes, and income levels (County General Plan Goal HO-1).
- **Provide a strong community identity and quality built environment.** Establish a community setting with an identifiable character and a visually attractive design theme that is compatible with the surrounding area and contributes to the quality of life and economic health (County General Plan Goal 2.4). Carefully plan and incorporate visual elements that enhance and promote a sense of community (County General Plan Goal 2.5) and provide quality residential environments for all income levels (County General Plan Goal HO-2).
- **Utilize existing infrastructure and public services.** Promote compact land use patterns in Community Regions to maximize existing public services, such as water, wastewater, parks, schools, solid waste, fire protection, law enforcement, and libraries, thus accommodating new growth in an efficient manner (County General Plan Goal 5.1).
- **Create a new non-motorized transportation system.** Create a new non-motorized transportation system (County General Plan Goal TC-4) linking new development to existing and proposed new retail services. Incorporate Class I bike paths, "complete streets" with Class II bike lanes, and sidewalks in new development to promote alternative transportation modes and reduce vehicle miles traveled.
- **Create opportunities to expand the regional trail system.** Design a trail network for pedestrian and cyclist enjoyment in a manner that coordinates trail connectivity with adjoining undeveloped properties, with a linkage to the El Dorado Trail (County General Plan Goal 9.1).
- **Provide opportunities for recreational facilities in El Dorado Hills.** Provide recreational facilities for the health and welfare of residents and visitors by providing park land and fees (County General Plan Goal 9.1).
- **Maintain characteristics of natural landscape.** Maintain natural landscape features, including ridgelines (GP Goal 2.3), conserve existing natural resources for ecological value (County

General Plan Goal 7.4), and conserve open space to provide for the enjoyment of scenic beauty (County General Plan Goal 7.6).

- **Minimize impacts on oak woodlands.** Minimize impacts on the oak woodlands by directing new development to areas with minimal or little oak canopy.
- **Preserve natural habitats and set aside wildlife corridors.** Enhance the natural environment by preserving and protecting habitat within open space areas, including corridors for wildlife movement (County General Plan Goal 7.4). Incorporate the project site's natural features as an amenity for the community to enjoy, and provide opportunities for recreational activities.
- **Protect important cultural resources.** Protect the County's important cultural resources (County General Plan Goal 7.5), including significant archaeological and Native American resources and unique historical features.
- **Foster sustainable communities.** Foster sustainable communities (County General Plan Goal 2.1) by utilizing sustainable design practices to reduce greenhouse gas emissions, and increase the efficiency of energy and water use in new development (County General Plan Goal HO-5).

Impact Avoidance

Alternatives should provide a means of avoiding altogether or reducing the level of impacts that would otherwise result from implementation of the project. For comparison purposes, the following significant and unavoidable and less-than-significant impacts with mitigation would result from the proposed project. These impacts are analyzed in Chapter 3, *Impact Analysis*, Sections 3.1 through 3.14.

Significant and Unavoidable Impacts

Aesthetics

- Impact AES-1: Temporary visual impacts caused by construction activities
- Impact AES-4: Substantially degrade the existing visual character or quality of the site and its surroundings
- Impact AES-5: Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area

Air Quality

- Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan
- Impact AQ-3a: Expose sensitive receptors to substantial toxic air contaminant concentrations and health risks during construction

Greenhouse Gas Emissions

- Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
- Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases

Noise

- Impact NOI-1a: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance as a result of construction activities
- Impact NOI-1b: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance from project-generated traffic within the LRVSP in excess of standards established in the County General Plan
- Impact NOI-4: Result in noise impacts due to activities associated with project offsite improvements

Population and Housing

- Impact POP-1: Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)

Transportation and Circulation

- Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

Less than Significant with Mitigation

Air Quality

- Impact AQ-2a: Result in a cumulatively considerable net increase of any criteria pollutant during construction for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard
- Impact AQ-2c: Result in a cumulatively considerable net increase of any criteria pollutant during combined construction and operation for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard
- Impact AQ-3c: Expose sensitive receptors to substantial criteria pollutant concentrations during construction and operation
- Impact AQ-3d: Expose sensitive receptors to naturally occurring asbestos and associated health risks during construction
- Impact AQ-5: Result in a cumulatively considerable net increase of any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or generate odors as a result of construction and operations of offsite improvements
- Impact AQ-6: Result in a cumulatively considerable net increase of any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or generate odors as a result of implementation of General Plan Policy TC-Xf improvements

Biological Resources

- Impact BIO-1: Loss of oak woodland
- Impact BIO-2: Loss of riparian woodland

- Impact BIO-3: Loss of jurisdictional wetlands, including seasonal wetland, seasonal wetland seep, and seasonal wetland pond
- Impact BIO-4: Loss of other waters of the United States, including perennial creek, intermittent stream, ephemeral stream, and stock pond
- Impact BIO-5: Potential loss of special-status plants
- Impact BIO-7: Potential mortality or disturbance of California red-legged frog in the project area
- Impact BIO-8: Potential mortality or disturbance of foothill yellow-legged frog in the project area
- Impact BIO-9: Potential mortality or disturbance of northwestern pond turtle in the project area
- Impact BIO-10: Potential mortality or disturbance of Blainville's horned lizard in the project area
- Impact BIO-11: Potential mortality or disturbance of nesting special-status and non–special-status birds in the project area
- Impact BIO-12: Potential injury, mortality, or disturbance of tree-roosting bats and removal of roosting habitat in the project area
- Impact BIO-13: Potential mortality or disturbance of American badger in the project area
- Impact BIO-14: Potential mortality or disturbance of ringtail in project area
- Impact BIO-15: Interfere with the movement of resident or migratory wildlife
- Impact BIO-16: Conflict with the County General Plan oak protection policies
- Impact BIO-17: Potential introduction and spread of invasive plant species
- Impact BIO-18: Potential loss of sensitive natural communities in the offsite improvement areas
- Impact BIO-19: Potential loss of waters of the United States within the offsite improvement areas
- Impact BIO-20: Potential impacts on special-status plant species in the offsite improvement areas
- Impact BIO-21: Potential mortality or disturbance of listed vernal pool branchiopods and their habitat in the offsite improvement areas
- Impact BIO-23: Potential mortality or disturbance of California red-legged frog in the offsite improvement areas
- Impact BIO-24: Potential mortality or disturbance of foothill yellow-legged frog in the offsite improvement areas
- Impact BIO-25: Potential mortality or disturbance of Northwestern pond turtle in the offsite improvement areas
- Impact BIO-26: Potential mortality or disturbance of Blainville's horned lizard in the offsite improvement areas
- Impact BIO-27: Potential mortality or disturbance of nesting special-status and non–special-status birds in the offsite improvement areas

- Impact BIO-28: Potential mortality or disturbance of tree-roosting bats and removal of roosting habitat in the offsite improvement areas
- Impact BIO-29: Potential mortality or disturbance of American badger in the offsite improvement areas
- Impact BIO-30: Potential mortality or disturbance of ringtail in the offsite improvement areas

Cultural Resources

- Impact CUL-1: Cause a substantial adverse change in the significance of a historic period district that is a historical resource as defined in Section 15064.5
- Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource that is a historic resource pursuant to Section 15064.5
- Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries
- Impact CUL-4: Result in disturbance to or destruction of cultural resources as a result of offsite infrastructure and General Plan Policy TC-Xf improvements

Geology, Soils, Minerals, and Paleontological Resources

- Impact GEO-3: Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse
- Impact GEO-4: Result in fracturing and/or erosion from special construction methods, increasing the potential for additional development constraints beyond those that currently exist
- Impact GEO-9: Directly or indirectly destroy a unique paleontological resource
- Impact GEO-10: Impacts on geological, mineral and paleontological resources resulting from offsite improvements, and General Plan Policy TC-Xf improvements

Greenhouse Gas Emissions

- Impact GHG-3: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment as a result of offsite improvements
- Impact GHG-4: Impacts on GHG emissions resulting from implementation of County General Plan Policy TC-Xf traffic improvements

Hazards and Hazardous Materials

- Impact HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Impact HAZ-8: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires; substantially impair an adopted emergency response plan or emergency evacuation plan; due to slope, prevailing winds, and other factors, exacerbate wildfire risks; require the installation or maintenance of associated infrastructure that may exacerbate fire

risk; or expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

- Impact HAZ-9: Create a significant hazard to the public or the environment as a result of offsite infrastructure and General Plan Policy TC-Xf traffic improvements

Hydrology, Water Quality, and Water Resources

- Impact WQ-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality
- Impact WQ-6: Impacts on hydrology and water quality resulting from offsite improvements, including General Plan Policy TC-Xf traffic improvements

Noise and Vibration

- Impact NOI-1c: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance for stationary or non-transportation noise sources during project operation
- Impact NOI-2: Generation of excessive groundborne vibration or groundborne noise levels

Public Services and Utilities

- Impact PSU-2: Require or result in the relocation or construction of new or expanded wastewater treatment or storm water drainage facilities, the construction or relocation of which could cause significant environmental effects
- Impact PSU-3: Require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects

Recreation

- Impact REC-1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated
- Impact REC-2: Require the construction or expansion of offsite recreational facilities that might have an adverse physical effect on the environment

Transportation and Circulation

- Impact TRA-4: Result in inadequate emergency access

Feasibility

CEQA requires that alternatives considered in an EIR be feasible. State CEQA Guidelines Section 15364 defines *feasible* 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." CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be probably feasible. Factors considered in determining an alternative's feasibility included site suitability, infrastructure availability, general plan consistency, consistency with other plans and regulatory limitations, jurisdictional boundaries, economic viability, and whether an alternate site could reasonably be acquired.

4.3 Alternatives Analysis

After the screening process, three alternatives—a reduced-density alternative, a 50% reduced-density alternative, and a wetlands avoidance and historic resources protection alternative—were determined to meet most of the project objectives, as required by State CEQA Guidelines Section 15126.6, as well as the CEQA requirements for feasibility, and reduce or eliminate project impacts. In addition, a no-project alternative must be considered in an EIR. The following alternatives are, therefore, evaluated in comparison with the proposed project in this EIR (Table 4-1).

- Alternative 1—No Project
- Alternative 2—Reduced Density (0.2 Dwelling Units per Acre)
- Alternative 3—50% Reduced Density
- Alternative 4—Wetlands Avoidance and Historic Resources Protection

Table 4-1. Alternatives Analyzed

Land Use	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Density	Alternative 3 – 50% Density	Alternative 4 – Wetlands Avoidance and Historic Resources Protection
Developed Acres	405	611	523	405	376
Open Space Acres	335	129	217	335	364
Total SFR dus	800	56	148	400	800
du/ac	1.08	0.08	0.20	0.54	1.08
Offsite Improvements					
Road through VMVSP area	X	X	X	X	X
Utilities through VMVSP area	X		X	X	X
Dry utilities tie in	X	X	X	X	X
Potable water line along Bass Lake Road	X		X	X	X
Water and utilities in Shingle Lime Mine Road	X		X	X	X
Interim Phase I potable water improvements	X		X	X	X
County General Plan Policy TC-Xf Improvements					
Improve the Country Club Drive/Cambridge Road intersection	X		X	X	X

Land Use	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Density	Alternative 3 – 50% Density	Alternative 4 – Wetlands Avoidance and Historic Resources Protection
Improve the Cambridge Road/ Knollwood Drive intersection	X		X	X	X

SFR = single-family residence.
dus = dwelling units.
du/ac = dwelling unit/acre.

4.3.1 Alternative 1—No Project

State CEQA Guidelines Section 15126.6(e)(2) of the requires every EIR to include an analysis of the No-Project Alternative. Evaluation of the No-Project Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. As provided by State CEQA Guidelines Section 15126(e)(3)(A), a discussion of the No-Project Alternative usually proceeds along one of two lines: a "plan-to-plan" comparison when the project is the revision of an existing land use plan, such as the proposed project; or—if the project is other than a land use plan (e.g., a development project on identifiable property)—a comparison of the environmental effects of the property remaining in its existing state against the environmental effects if the proposed project is approved. Under the plan-to-plan comparison, the analysis examines "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (State CEQA Guidelines Section 15126.6 [e][2]).

According to the County General Plan, the project area currently consists of eight parcels with a land use designation of RR (Rural Residential) and one parcel (109-020-04) with a land use designation of OS (Open Space). Two of the four remaining parcels (109-020-04 and -020) are zoned Open Space and the last two parcels (109-020-05 and -06) are zoned Rural Lands (RL). Table 4-2 summarizes the development potential under existing designations and zoning. The development intensity of the No-Project Alternative (0.08 du/ac) would be similar to developing 1 residence on every 13 acres of the 740-acre project area, on average. Figure 4-1 depicts likely development of the LRVSP area under the No-Project Alternative. Based on current land use designations, residential units would generally be located in areas proposed for residential land uses under the proposed project. However, some locations (e.g., northwest and southwest) would have only a few units. Most of the units would be in the northeast part of the project area, where the density would be approximately 1 unit for every 10 acres.

Table 4-2. Existing Land Use Designations and Zoning

Assessor's Parcel No.	Area (acres)	Land Use	Zoning	Max No. Units	Du/ac
109-010-09	10.00	RR	RE-10 PD	1	0.1
109-010-10	10.00	RR	RE-10 PD	1	0.1
109-010-13	40.00	RR	RE-10 PD	4	0.1
109-010-14	80.00	RR	RE-10 PD	8	0.1
109-020-01	391.47	RR	RE-10 PD	39	0.1
109-020-04	120.00	OS	OS	0	
109-020-05	40.00	RR	RL	1	0.025

Assessor's Parcel No.	Area (acres)	Land Use	Zoning	Max No. Units	Du/ac
109-020-06	39.94	RR	RL	2	0.05
109-020-20	9.00	RR	OS	0	
Total	740.41			56	0.08

General Plan Land Use
RR = Rural Residential.
OS = Open Space.
Zoning
RE-10 = Estate Residential 10 Ac. (Min. Lot Area).
RL = Rural Lands.
OS = Open Space.
PD = Planned Development Overlay Zone.

The No-Project Alternative would require a roadway connection and an internal roadway network similar to the proposed project. Offsite infrastructure for the No-Project Alternative may not be required as it would be for the proposed project. Under the No-Project Alternative, residents on 10-acre minimum parcels could rely on wells and septic systems rather than connecting to El Dorado Irrigation District (EID) facilities. The No-Project Alternative does not include amendments to the County General Plan land use designations. Development would instead be guided by the existing land use plans, policies, and regulations, including the County General Plan. Development of one, two, or four units would be ministerial in nature and tentative maps would not be required (Figure 4-1). Tentative maps would be required for development of parcels where eight or 39 units are proposed and separate CEQA review would be required.

Aesthetics

Proposed development in the project area would be reduced under the No-Project Alternative compared with the proposed project. Similar to the proposed project, the same areas proposed for development would be developed under this alternative, but the entire project area would only have 56 dwellings compared to 800. The No-Project Alternative may or may not incorporate sensitive design techniques that are similar to the LRVSP guiding policies for design. However, construction of the No-Project Alternative would require less grading and earthwork and the removal of fewer oak trees and less vegetation associated with manzanita chaparral and grasslands that are an onsite visual amenity. Both the proposed project and No-Project Alternative would result in new sources of nighttime light in an area that is not well lit. However, the No-Project Alternative would result in less lighting, because there would be fewer residences compared with the proposed project. Lighting impacts would still be significant and unavoidable under the No-Project Alternative due to the increase in lighting on the project site that is currently unlit and within an area where the surrounding developed areas are low lit. As described above, offsite infrastructure for the No-Project Alternative may not be required because residents could rely on wells and septic systems rather than connecting to EID facilities. Well and septic systems would continue to be constructed underground, and disturbed ground would be restored during construction so that the systems would not be visible or degrade the existing visual environment. Similar to the proposed project, the No-Project Alternative would require a roadway connection and an internal roadway network. The roadway connection would be dependent on whether the VMVSP is constructed prior to the LRVSP, but visual impacts resulting from the construction of a roadway connection would be similar to those described for the proposed project. Mitigation measures similar to those established for the proposed project would reduce visual impacts under the No-Project Alternative, where a separate

environmental review would be required (for the two parcels with more dwelling units). All of these factors would reduce the No-Project Alternative's impact on scenic vistas and visual resources because the site would appear less developed compared with the proposed project; however, the No-Project Alternative would still result in significant and unavoidable visual impacts due to the conversion of open space to developed land uses. The No-Project Alternative, like the proposed project, would not result in visual impacts on scenic resources along scenic highways because the project area is not along a scenic highway.

Air Quality

The types of air quality impacts under the No-Project Alternative would be similar to those under the proposed project, but of a lesser magnitude. Development would be consistent with the existing County General Plan and would be limited to 56 rural residential dwelling units. As with the proposed project, construction and combined construction and operation of these features would generate criteria pollutant emissions that could exceed the El Dorado County Air Quality Management District's (EDCAQMD) significance thresholds. However, because the extent of construction and operational activities are less under the No-Project Alternative than under the proposed project, criteria pollutant emissions generated by the No-Project Alternative would likely be lower than those estimated for the proposed project. While fewer emissions are expected under the No-Project Alternative, the No-Project Alternative would still exceed EDCAQMD's thresholds and result in a significant air quality impact. The No-Project Alternative would be required to comply with all state and local rules and regulations to control criteria pollutants. Mitigation measures established for the proposed project would also reduce emissions.

Implementation of the No-Project Alternative could expose new and existing sensitive receptors in adjacent residential developments to significant health risks from criteria pollutants and toxic air contaminants (TAC), including diesel particulate matter (DPM), generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the No-Project Alternative would be less than that of the proposed project because there would be less construction and fewer operational emission sources. Criteria pollutants and TAC would also be reduced through best available control technologies identified in mitigation measures in the certified EIR, which required the use of low-emissions construction equipment, as feasible. However, like the proposed project, there may be instances where specific conditions preclude the reduction of health risks below adopted thresholds, resulting in a significant impact.

Similar to the proposed project, receptors could also be exposed to significant naturally occurring asbestos (NOA). The requirements identified in Mitigation Measure AQ-3, discussed in Section 3.2, *Air Quality*, would reduce any significant NOA impacts to a less-than-significant level.

Like the proposed project, the No-Project Alternative would not result in new or worsened odors that would affect a substantial number of people, and odor impacts would be less than significant. Similarly, carbon monoxide (CO) modeling for the No-Project Alternative showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur.

Biological Resources

Under the No-Project Alternative, 129 acres would be designated for Open Space. This amount is less than the 335 acres of designated Open Space under the proposed project. The development footprint would likely be less than under the proposed project, however, because the No-Project

Alternative would be mostly very low-density residential. Because of this reduced construction footprint, the impacts of the No-Project Alternative on chaparral habitat, annual grassland, and waters of the United States would be less under the No-Project Alternative than under the proposed project. Due to the reduced area of Open Space, however, impacts of the No-Project Alternative on oak woodlands and riparian habitat could be slightly greater than impacts of the proposed project, depending on the location of residences and other development on each parcel. Although there would be fewer residences constructed under the No-Project Alternative, more land would be private property that is not subject to protection after initial construction. However, with 744 fewer residences, it is likely that even with potential outbuildings and swimming pools, less acreage would be disturbed; therefore, the impact on habitats in the project area would be less than under the proposed project.

Impacts on special-status plant and wildlife species would generally be less substantial under the No-Project Alternative because less overall habitat would be disturbed, as described above. However, for those terrestrial species that use oak woodland and riparian habitats, impacts on wildlife movement would be greater under the No-Project Alternative. Construction and development would be more dispersed under the No-Project Alternative than under the proposed project, and there would be no designated open space corridors through the area. Although there may be less overall disturbance, it is expected that individual property owners would install fences and build structures that would likely impede wildlife movements through the project area.

Mitigation Measures BIO-1 through BIO-21, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Chapter 3, Section 3.3, *Biological Resources*), would still be needed under this alternative to reduce impacts on biological resources, although no mitigation is available under this alternative to reduce impacts on wildlife movement to a less-than-significant level.

Cultural Resources

The No-Project Alternative would have a lesser impact on cultural resources than the proposed project. Under the No-Project Alternative, approximately 120 acres would be zoned as Open Space compared to 335 acres under the proposed project. However, the extent of development would be less because fewer residential units would be constructed under the No-Project Alternative. General Plan Policies 7.5.1.3 and 7.5.1.6, would still apply and, therefore, cultural resources would be considered and treated appropriately. Under the No-Project Alternative, mitigation measures similar to those described in Chapter 4, Section 3.4, *Cultural Resources*, would be necessary to reduce impacts on cultural resources to a less-than-significant level.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The No-Project Alternative would result in no change in existing designated land uses, including residences, designated Open Space, and roadways. The number of residential units and total footprint acreage that would be developed under the No-Project Alternative would be less than that developed under the proposed project. As a result, less construction activity would be required under the No-Project Alternative, which would lead to less overall construction impacts compared to the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, and earthquake safety. Although the No-Project Alternative would be

in the same area as the proposed project, the proposed project specifically delineates a mine setback line and applies use restrictions at the location where mining operations took place. Development of fewer residences in the area would result in less of an impact related to potential subsidence or collapse because fewer people and structures would be exposed to this potential impact. Development of the area under the No-Project Alternative would require consideration of this potential hazard and mitigation similar to that developed for the proposed project to monitor subsidence would likely be required. The proposed project would require grading for approximately 56 acres, whereas the No-Project Alternative would likely result in localized grading at individual properties.

Minerals Resources

The impacts on mineral resources under the No-Project Alternative would be similar to those of the proposed project. Because this alternative is located on the same parcels, mineral resource zones (MRZs) identified within the footprint of the No-Project Alternative are the same as those for the proposed project. Under the No-Project Alternative, construction would occur primarily under General Plan low density Rural Residential and the extent of construction it expected to be less. As with the proposed project, there would be a less-than-significant impact on known important mineral resources and no impact on the availability of important mineral resource sites.

Paleontological Resources

The impacts on paleontological resources under the No-Project Alternative would be similar to those under the proposed project but of a lesser magnitude. Under the No-Project Alternative, construction would occur during development of very low density Rural Residential dwellings. As with the proposed project, this construction could occur in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium and, therefore, result in impacts on paleontological resources. However, because the extent of construction would be much less under the No-Project Alternative than under the proposed project, the impact would be of a lesser magnitude. The overall development footprint associated with the No-Project Alternative would be less, as would be the construction-related impacts associated with the No-Project Alternative. Implementation of Mitigation Measures GEO-9a, GEO-9b, and GEO-9c, which require training of personnel to recognize fossil material and stop work if fossils or caves are encountered, would reduce this impact to a less-than-significant level.

Greenhouse Gas Emissions

Similar to criteria air pollutant emissions, construction, and operational GHG emissions associated with the No-Project Alternative would likely be lower than those estimated for the proposed project. However, because the LRVSP would not be adopted under the No-Project Alternative, policies outlined in the LRVSP Sustainability Element intended to reduce GHG emissions would not be incorporated into the project design. Therefore, although operational emissions associated with the No-Project Alternative may be less than the proposed project, development under the No-Project Alternative would generate new vehicle trips and consume fossil fuels, which could conflict with the state's goal to reduce regional per-capita VMT and achieve carbon neutrality. Construction would result in annual GHG emissions from equipment and vehicles and permanent losses of natural lands. Mitigation measures established for the proposed project would reduce GHG emissions generated by the No-Project Alternative. However, similar to the proposed project, the No-Project Alternative's cumulative contribution of GHG emissions would be significant and unavoidable, and the No-Project

Alternative could conflict with the 2017 Scoping Plan and the state's long-time climate change goals in Assembly Bill (AB) 1279 and the 2022 Scoping Plan.

Hazards and Hazardous Materials

The impacts related to hazards and hazardous materials under the No-Project Alternative would be similar to those under the proposed project but of a lesser magnitude. The number of residential units that would be developed under the No-Project Alternative would be less than the number of units developed under the proposed project. As a result, less construction activity would be required under the No-Project Alternative, which would lead to fewer overall construction hazardous materials use impacts compared with the proposed project. Fewer units would also result in less generation of household hazardous waste.

The Phase I Environmental Site Assessment identified hazardous materials in the project site and recommends further investigation. As with the proposed project, Alternative 1 would require a Phase II Environmental Assessment to assess implementing the recommendations identified in the Phase I Environmental Site Assessment Report (Youngdahl Consulting Group 2009) before issuance of a grading permit.

The County has not identified specific roads as emergency evacuation routes but encourages residents to learn their local roads in preparation for an emergency (Cathey pers. comm.); therefore, development under this alternative would not be expected to result in significant impacts on emergency response or evacuation plans. This impact would be similar under the No-Project Alternative because there would be less development and fewer residences; however, this impact would have a lesser magnitude under the No-Project Alternative than under the proposed project.

Although development under this alternative would introduce new fire hazards or risk to people and structures in the project area, existing County policies related to fire hazards and fire minimization would be enforced, and subdivision plans would need to be approved by the El Dorado County Fire Protection District and the California Department of Forestry and Fire Protection. As under the proposed project, this impact would be less than significant. Because there would be less development, fewer residences, and fewer residents, the risk of people and structures being exposed to fire would be less under the No-Project Alternative than under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the No-Project Alternative would be similar to those of the proposed project but of a much lesser magnitude because the No-Project Alternative would develop substantially fewer residential units, and some of the units would be on 10-acre parcels. As with the proposed project, such impacts would be minimized and would be less than significant through compliance with the latest National Pollutant Discharge Elimination System (NPDES) permit and other water quality requirements (i.e., Construction General Permit, Small Phase I Municipal Separate Storm Sewer System [MS4] Permit, waste discharge requirements [WDRs] for dewatering, other federal and state regulations, County General Plan standards, and County and other local ordinances). In addition, Mitigation Measures BIO-1a through BIO-1c, BIO-3a, and BIO-3b, as recommended for the proposed project, would be required to reduce potential water quality impacts where wetlands or other waters may be affected by construction.

Regarding post-development impacts, proper measures to maintain water quality after construction would be required as under the proposed project, which would require preparation of a drainage

study and identification of postconstruction drainage system features and water quality protection measures. Source and treatment control measures contained in the State Water Resources Control Board MS4 Permit Order No. 2013-0001-DWQ, the El Dorado County Stormwater Management Program (SWMP) (El Dorado County 2004) and the County Drainage Manual (El Dorado County 2020), and/or U.S. Environmental Protection Agency (USEPA) guidance and other related guidance documents would be implemented. General site housekeeping and design control measures incorporated into the project design can include conserving natural areas, protecting slopes and channels, and minimizing impervious areas. Treatment control measures may include use of vegetated swales and buffers, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other low impact development (LID) technology measures. These measures can also help comply with the Central Valley Regional Water Quality Control Board (Central Valley Water Board) Basin Plan, which specifies water quality objectives and beneficial use requirements.

The overall development footprint associated with the No-Project Alternative would be smaller, and there would be fewer postconstruction impacts associated with the No-Project Alternative than under the proposed project.

Land Use Planning and Agricultural Resources

Unlike the proposed project, the No-Project Alternative does not include amendments to the County General Plan land use designations. Development would instead be guided by the existing land use plans, policies, and regulations, including the County General Plan. Therefore, because the No-Project Alternative would be consistent with the County General Plan and zoning, environmental impacts related to land use compatibility would not result.

As with the proposed project, the No-Project Alternative would not physically divide an existing community.

There would be no impacts associated with conversion of agricultural land—including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance—or conversion of forest land to non-agricultural or non-forest use under either the No-Project Alternative or the proposed project because no agricultural or forest lands are present on or adjacent to the site.

No other land use or agricultural resources impacts of the proposed project would be reduced by implementation of the No-Project Alternative as shown in Table 4-7. The No-Project Alternative would not result in any significant impacts related to agriculture or land use. Therefore, impacts under the No-Project Alternative would be similar to the proposed project.

Noise and Vibration

The No-Project Alternative would result in the development of residential units, roadways, and some utility infrastructure, and in the designation of open space. The number of residential units that would be developed under the No-Project Alternative would be considerably less than the number of units developed under the proposed project. As a result, less construction activity and a shorter construction period would be required under the No-Project Alternative; therefore, impacts from construction noise would be less than under the proposed project. However, it is possible that the same construction equipment assumed to operate simultaneously for the proposed project analysis could operate simultaneously during construction of this alternative, resulting in comparable construction noise levels. Therefore, both the proposed project and the No-Project Alternative would result in construction noise near existing residences, although these impacts

would affect different areas of the project site, and the No-Project Alternative would affect fewer people and for a shorter duration. Mitigation Measure NOI-1a, as discussed in Chapter 3, Section 3.10, *Noise and Vibration*, would be implemented to reduce construction impacts on existing residences to a less-than-significant level. Impacts would be less than under the proposed project.

Because there would be less development under the No-Project Alternative than under the proposed project, impacts would be less than under the proposed project. However, Mitigation Measure NOI-1b to prepare and implement a noise control plan for a specific residence could be necessary to avoid an exceedance of the County's compatibility standard. Even with this plan, noise at the residence at 2080 Marble Valley Road could exceed this standard, as under the proposed project, and result in a significant and unavoidable impact.

Traffic noise impacts on the residence at 2080 Marble Valley Road would be less severe than under the proposed project, because the No-Project Alternative would generate less vehicle traffic and, therefore, would result in less operational noise. However, because of the proximity of the residence to the roadway, the traffic noise increase at this residence could be substantial. Impacts would be less severe than under the proposed project but could still be significant and unavoidable under the No-Project Alternative.

As with the proposed project, implementation of the No-Project Alternative would not likely require impact equipment that could generate substantial ground vibrational impacts. However, similar to the proposed project, implementation of the No-Project Alternative could involve some blasting that would generate vibration. Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Impacts would be the same as under the proposed project, because blasting activities could be similar even though overall construction would be less.

Because the project site would be the same for the No-Project Alternative as it would be for the proposed project, development under the No-Project Alternative would also not be located within noise contours of any public or private airports and would not change airport operations such that there would be changes in airport noise contours that would expose people to substantial noise.

Population and Housing

Development under the No-Project Alternative would follow the current and anticipated trend of continuing growth in unincorporated El Dorado County. Development under this alternative would occur as currently entitled or allowed under existing land use designations, with up to 56 low-density residential units. Using El Dorado County's average household size of 3.06 people per unit for single-family low-density residential, occupancy of 56 new housing units would be expected to increase the County's population by approximately 171 people, which represents 7% of the anticipated 2,336 residents projected for the proposed project. As under the LRVSP, the 56 housing units allowed under the No-Project Alternative would increase population; however, the No-Project Alternative would induce less population growth than the proposed project and would not result in a significant and unavoidable impact related to growth, as would the proposed project.

The project area currently contains 6 residences. Therefore, as with the proposed project, development under the No-Project Alternative has the potential to displace these 6 existing housing units. However, this alternative, like the proposed project, would result in the creation of additional housing units in excess of the 6 existing units. Therefore, impacts of the No-Project Alternative on the displacement of people and necessity of constructing replacement housing elsewhere would be the same as those of the proposed project.

Public Services and Utilities

Fewer dwelling units and, therefore, fewer residents are expected under the No-Project Alternative, causing less demand on fire and police services. The No-Project Alternative would result in 38 school-age children rather than 542 as under the proposed project, resulting in less demand on schools.[1] Therefore, overall, the No-Project Alternative would result in reduced impacts on public services compared to the proposed project.

The No-Project Alternative would also result in less demand on potable water, recycled water, solid waste services, dry utilities, electricity, natural gas, and other energy demands compared with the proposed project. There would be no additional wastewater demands under the No-Project Alternative because they have already been calculated in EID's planning. The proposed project, in contrast, would result in additional wastewater demands on EID. It is anticipated that development under the No-Project Alternative would use wells and septic systems rather than connecting to the EID system, which would result in no impacts related to the construction of connections to the existing system described for the proposed project. As such, no mitigation measures related to the construction of connections to the existing system would be necessary. As described in Chapter 3, Section 3.12, *Public Services and Utilities*, Impact PSU-8, the same energy- and resource-conserving effects that would occur under the proposed project would occur under this alternative. The No-Project Alternative would result in 56 residences as opposed to 800 under the proposed project. The reduced number of residences would result in less the energy required for construction, and operation. Operational energy requirements associated with heating, air conditioning, appliances, electricity, and other utilities would be substantially reduced, as would traffic trips. Because the overall development footprint associated with the No-Project Alternative would be smaller than that of the proposed project, with substantially fewer residents, the construction- and operation-related effects would be of a lesser magnitude, causing less demand for public services, utilities, and energy compared to the proposed project.

Recreation

Development under the No-Project Alternative would increase the population in an area currently deemed deficient in recreational resources. Using the County's park-planning household size of 3.3 people per single-family residential unit, the No-Project Alternative would be expected to introduce approximately 185 park users into the area, compared with 2,640 new park users under the proposed project. These 185 new park users represent 7% of the park users anticipated under the LRVSP. Unlike the proposed project, the No-Project Alternative would not provide any public parkland. However, because the 185 new park users expected under the No-Project Alternative would require less parkland (0.9 acre) than the unserved population expected under the proposed project (5.2 acres, as described in Chapter 3, Section 3.13, *Recreation*), the No-Project Alternative is expected to add fewer users to existing park facilities. Effects of the No-Project Alternative on the deterioration of existing neighborhood parks would, therefore, be significant but less than those of the proposed project. Development under the No-Project Alternative would require parkland dedication or payment of in-lieu fees to the El Dorado Hills Community Services District (CSD), which would mitigate any impact of the No-Project Alternative.

The No-Project Alternative would not involve construction of any new parks and, therefore, could result in the need to expand existing facilities or construct new facilities offsite to accommodate

[1] Using student generation rates as stated in Section 3.12, *Public Services and Utilities*, Table 3.12-9.

increased population. As described in Chapter 3, Section 3.13, *Recreation*, the proposed project would result in a deficiency of 5.2 acres of parkland. Using the same parkland dedication standards, the No-Project Alternative would result in a parkland deficiency of 0.9 acre. Development under the No-Project Alternative for offsite parkland would require parkland dedication or payment of in-lieu fees to the CSD, which would mitigate any impact of the No-Project Alternative. Because the location of any such offsite recreational facilities has not been determined, and no plan identifies actual facilities or locations for future projects, precise environmental impacts associated with them would be speculative to address at this time. Project-specific environmental review would be required to identify actual impacts of new park facilities based on the precise type and location of those facilities.

Transportation and Circulation

The No-Project Alternative would allow the project to develop consistent with the current zoning, which could allow for the construction of up to 56 single-family dwelling units at the project site. The No-Project Alternative would not include any bicycle or pedestrian trails (Table 4-3).

Table 4-3. Trip Generation under the No-Project Alternative and the Proposed Project

		Trips		
Alternative	Single-Family Dwelling Units	Daily	A.M.	P.M.
No-Project Alternative	56	533	42	57
Proposed Project	800	7,616	600	801
Difference (No-Project Alternative – Proposed Project)	-744	-7,083	-558	-744

The impacts on transportation under the No-Project Alternative would be similar to the proposed project (additional traffic volumes associated with residential development). As summarized in Table 4-3, the No-Project Alternative provides for the development of 56 single-family units on the project site instead of the 800 units proposed, a reduction of 744 single-family units (or about 93%), resulting in about 7,100 fewer trips per day added to area roadways compared with the proposed project. This would result in less total VMT than the proposed project. The VMT efficiency of the No-Project Alternative, measured in terms of VMT per capita, would be similar to the proposed project because the location is the same but less efficient than the proposed project since the residential development would be lower density.

The No-Project Alternative would not include bicycle and pedestrian trails; therefore, impacts related to these resources would be greater than under the proposed project, but would be less than significant, as under the proposed project. Park-and-ride facilities that would mitigate impacts under the proposed project would likely not be necessary under the No-Project Alternative based on the reduced residents.

The impact of the No Project Alternative would be significant and unavoidable as under the proposed project.

Application of Screening Criteria

Ability to Meet Project Objectives

The County's primary objective for the proposed project is to create development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community. The No-Project Alternative would make efficient and feasible use of existing infrastructure (e.g., roadways), but it might not necessarily promote a sense of community to the same degree as the proposed project because no plan is proposed for the parcels and development would likely be piecemeal. It would also not meet other objectives identified by the project proponents, including preserving and recognizing the unique historical character of the site, incorporating the site's natural features and preserving large amounts of undeveloped areas through Open Space designation.

Impact Avoidance

The No-Project Alternative would result in development of substantially fewer dwelling units and less acreage in designated Open Space. Therefore, the No-Project Alternative would result in a reduction of impacts related to population growth, such as air quality, GHG emissions, noise, and demand for services and utilities. Impacts on geology, hydrology, and paleontology would be reduced because less construction would take place. Impacts on biological resources would be reduced on some species and increased on others, but, because fewer acres would be preserved in designated Open Space and because the No-Project Alternative would not establish a preserved corridor through the development area, impacts on wildlife movement would be greater. Because policies and ordinances to protect and preserve cultural resources exist in the County General Plan and County Code, and the number of dwelling units would be less than under the proposed project, impacts on cultural resources are anticipated to be less with the No-Project Alternative.

Feasibility

Implementation of the No-Project Alternative would be possible as described. However, this alternative would result in substantially fewer residential units within the same acreage but may be more economically difficult to develop for the applicant (e.g., infrastructure costs per residential unit would be higher than the proposed project).

4.3.2 Alternative 2—Reduced Density (0.2 Dwelling Unit per Acre)

Compared with the proposed project, the Reduced-Density Alternative would reduce the total number of dwelling units from 800 to 148, but would increase the development footprint by 116 acres. Alternative 2 would provide for development of Lime Rock Valley with 148 lots at a density of 0.2 dwelling unit per acre. This would be similar to developing the entire 740 acres with 5-acre lots. To avoid the most sensitive resources, some lots would be clustered. The lots would average about 3.5 acres in size. Development of the Reduced-Density Alternative would divide the 740-acre project site into approximately 217 acres of open space and about 523 acres of development. No public or private parks are proposed under this alternative. All the offsite improvements associated with the proposed project would also be required for Alternative 2. Figure 4-2 shows the development that would occur under Alternative 2.

Aesthetics

Compared with the proposed project, residential development in the project site would occur over a larger area due to larger parcels sizes but there would be fewer residences constructed. Therefore, construction of the Reduced-Density Alternative would require the removal of fewer oak trees and vegetation associated with manzanita chaparral and grasslands, which are an onsite visual amenity. Though more acreage would be in private property, with 652 fewer residences, it is likely that, even with potential outbuildings and swimming pools, less acreage would be disturbed, and more oak trees and vegetation would remain. Because the overall extent of construction is reduced, this alternative would have a lesser impact on chaparral, oak woodland, and annual grassland habitats as further addressed in *Biological Resources* below. Thus, the overall impact on visual resources and visual quality would be reduced compared to the proposed project. Mitigation Measures BIO-1a, BIO-1d, BIO-1e, AES-4a, and AES-4b established for the proposed project would reduce visual impacts under the Reduced-Density Alternative, yet impacts on the visual character would still be significant and unavoidable due to the conversion of open space to developed land uses. Both the proposed project and Reduced-Density Alternative would result in new sources of nighttime light in an area that is not well lit. However, the Reduced-Density Alternative would result in less lighting, because there would be fewer residences than under the proposed project. Lighting impacts would still be significant and unavoidable under this alternative, though, due to the increase in lighting in a low-lit area. The Reduced-Density Alternative, like the proposed project, would not result in visual impacts on scenic resources along scenic highways.

Air Quality

The types of air quality impacts under the Reduced-Density Alternative would be similar to those under the proposed project, but of a lesser magnitude. As with the proposed project, construction and combined construction and operation of new buildings would generate criteria pollutant emissions that could exceed the EDCAQMD's significance thresholds. Because the extent of construction and operational activities are less under the Reduced-Density Alternative than under the proposed project, criteria pollutant emissions generated by the Reduced-Density Alternative would likely be lower than those estimated for the proposed project. Mitigation Measures AQ-2a through AQ-2e, identified in Section 3.2, *Air Quality*, Mitigation Measures GHG-1 and GHG-2, identified in Section 3.6, *Greenhouse Gas Emissions,* and Mitigation Measure TRA-2, identified in Chapter 3.14, *Transportation and Circulation*, could be implemented to reduce emissions, but the potential to exceed EDCAQMD's thresholds and conflict with applicable air quality attainment plans would remain.

Implementation of the Reduced-Density Alternative could expose new residents and adjacent sensitive receptors to significant health risks from criteria pollutants and TACs, including DPM, generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the Reduced-Density Alternative would be less than that of the proposed project because there would be less construction and fewer operational emission sources. Construction TAC emissions would be reduced through Mitigation Measures AQ-2b, AQ-2c, and GHG-1. However, like the proposed project, there may be instances where specific conditions preclude the reduction of health risks from exposure to project-generated TACs during construction to below adopted thresholds, resulting in a significant impact.

Similar to the proposed project, receptors could be exposed to significant NOA impacts. The requirements identified in Mitigation Measure AQ-3, discussed in Section 3.2, *Air Quality*, would reduce any significant NOA impacts to a less-than-significant level.

Like the proposed project, the Reduced-Density Alternative would not result in new or worsened odors that would affect a substantial number of people, and odor impacts would be less than significant. Similarly, CO modeling for the proposed project showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur, and the same conclusion would be expected for the Reduced-Density Alternative, which would result in fewer vehicle trips and congestion.

Biological Resources

The impacts on biological resources under the Reduced-Density Alternative as compared with the proposed project would be similar for riparian habitat, but could be greater for chaparral, oak woodland, annual grassland, and waters of the United States, depending on the location of residences and other development on each parcel. Although there would be fewer residences constructed, more land would be private property and not subject to protection after initial construction. However, with 652 fewer residences, it is likely that, even with potential outbuildings and swimming pools, less acreage would be disturbed and, therefore, the impact on habitats in the project area would be less than under the proposed project.

Impacts on Layne's ragwort, a special-status plant species, could be greater than those under the proposed project, due to the lack of protection after construction. However, impacts on Bisbee Peak rush-rose would be similar, because the known populations are partially in proposed open space and would remain protected.

Impacts on special-status wildlife species would vary depending on the species and locations of buildings on the parcels. Under the Reduced-Density Alternative, parcels would be large enough to avoid the most sensitive resources, which are assumed to include vernal pool branchiopod habitat. The overall development footprint would be larger than that of the proposed project and that acreage would be private property and not subject to protection after initial construction. There would be more than 650 fewer residences constructed and it is likely that, even with potential outbuildings, swimming pools, and other improvements, less acreage would be disturbed. Impacts on species that use aquatic and wetland habitat (vernal pool branchiopods, California red-legged frog, and western pond turtle) could be greater than those of the proposed project because the habitat is discrete and could be in private property and not protected after initial construction from direct or indirect impacts. Impacts on species that use riparian and grassland habitat (white-tailed kite, bats, burrowing owl) would likely be less than the proposed project because the acreage of direct disturbance is expected to be less due to far fewer residences being constructed and fewer trees being removed. Further, fewer residences would result in less population and less human activity, which would be expected to reduce impacts on species of birds and raptors that avoid heavily populated areas. Impacts on Blainville's horned lizard would likely be less than the proposed project because the reduced density would result in less acreage of direct impact on grassland and chaparral habitat and fewer residents, which would result in less human activity in the area. Impacts on terrestrial wildlife movement would be greater than under the proposed project, due to the reduction of open space on the east side of the project area. Although there may be less overall direct disturbance of habitat, it is expected that individual property owners would install fences and build structures that would likely impede wildlife movements through the project area.

Mitigation measures BIO-1 through BIO-21, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Chapter 3, Section 3.3, *Biological Resources*), would still be needed under this alternative to ensure that impacts on biological resources are reduced to a less-than-significant level. Because overall, the areal extent of actual construction would be smaller under the Reduced-Density Alternative than under the proposed project, the impact on most biological resources identified in the project area would be of a lesser magnitude.

Cultural Resources

Impacts on built resources under the Reduced-Density Alternative would be the same as those of the proposed project. Mitigation Measure CUL-1 identified in Chapter 3, Section 3.4, *Cultural Resources*, would be necessary to keep impacts on built environment resources to a less-than-significant level.

The Reduced-Density Alternative as illustrated in Figure 4-2 would have a greater impact on known archaeological resources and potentially a lesser impact on unknown archaeological resources than would the proposed project. Though it would avoid many historical resources, the Reduced-Density Alternative could result in more impacts on the archaeological components of the LRVHD due to the location of development and depending on the location of residences and other development on each parcel. Although there would be less construction because fewer residences would be constructed, more land would be private property and not subject to preservation of archaeological resources after initial construction. With 652 fewer residences it is likely that, even with potential outbuildings and swimming pools, less acreage would be disturbed. Therefore, the impact on unknown cultural resources in the project area would likely be less than under the proposed project. To reduce impacts on archaeological resources to a less-than-significant level, Mitigation Measures CUL-1, CUL-2a, CUL-2b, CUL-2c, CUL-2d, CUL-3, CUL-4a, and CUL-4b as proposed for the project, would need to be implemented.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The impacts on geology and soils under the Reduced-Density Alternative would be less than those under the proposed project. The Reduced-Density Alternative would result in the development of residential land uses, open space, and roadways. The number of residential units that would be developed under this alternative would be less than that developed under the proposed project but with a different density mixture covering a larger area. As a result, less earth-moving activity would be required under the Reduced-Density Alternative, which would lead to less overall geology and soils impacts than under the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils and earthquake safety. However, the overall types of potential impacts would not be different under the Reduced-Density Alternative than under the proposed project, and Mitigation Measure GEO-4, identified in Section 3.5, *Geology, Soils, Minerals, and Paleontological Resources*, would be effective.

Impacts related to the potential for mine collapse would be similar to those under the proposed project. A mine setback would be established as with the proposed project, and Mitigation Measures GEO-3a, GEO-3b, and GEO-3c or similar mitigation would be required to reduce this impact to a less-than-significant level.

Minerals Resources

The impacts on mineral resources under the Reduced-Density Alternative would be similar to those of the proposed project. Construction under the Reduced-Density Alternative would occur on the same parcels and, therefore, within the same MRZs as the proposed project. Because there would be less construction associated with fewer residences, the impacts on mineral resources under this alternative would be less than those under the proposed project. As with the proposed project, there would be a less-than-significant impact on known important mineral resources and no impact on the availability of important mineral resource sites.

Paleontological Resources

The impacts on paleontological resources under the Reduced-Density Alternative would be similar to those under the proposed project but of a lesser magnitude. Under the Reduced-Density Alternative, the acreage zoned for development would increase but the density of development would be substantially less. As a result, though the acreage would be greater, the extent of earth-moving would be less. As with the proposed project, this construction could occur in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium and, therefore, could result in impacts on paleontological resources. Because the extent of construction is less under the Reduced-Density Alternative than under the proposed project, the impact would be of a lesser magnitude.

Greenhouse Gas Emissions

GHG impacts under the Reduced-Density Alternative would be similar to those under the proposed project, but of a lesser magnitude. Similar to criteria air pollutant emissions, construction and operational GHG emissions associated with the Reduced-Density Alternative would likely be lower than those estimated for the proposed project because of the reduced level of development. Compliance with LRVSP Sustainability Element policies would reduce construction and operational GHG emissions consistent with the relative reductions estimated for the proposed project.

Although GHGs resulting from buildout of the Reduced-Density Alternative may be less than the proposed project, development would generate new vehicle trips and consume fossil fuels, which could conflict with the state's decarbonization and carbon neutrality goal. The requirements listed in Mitigation Measures GHG-1, GHG-2, AQ-2b, and AQ-2c, as proposed for the project in Section 3.6, *Greenhouse Gas Emissions*, or similarly effective measures would still be needed under the Reduced-Density Alternative. However, even with mitigation, the Reduced-Density Alternative's cumulative contribution of GHG emissions would be significant and unavoidable, and the alternative could conflict with the 2017 Scoping Plan and the state's long-time climate change goals in AB 1279 and the 2022 Scoping Plan.

Hazards and Hazardous Materials

The impacts related to hazards and hazardous materials under the Reduced-Density Alternative would be similar to those under the proposed project but of a lesser magnitude. This alternative would allow development of 148 dwelling units on the 740-acre property at a reduced density, whereas the proposed project would allow up to 800 residential units. As a result of developing fewer residential units, less construction activity would be required under the Reduced-Density Alternative, which would lead to fewer overall construction impacts than under the proposed

project. Operation-related impacts would also be reduced compared with the proposed project. There would be no business-related wastes or hazard risks because there would be no civic-limited commercial development. Residential impacts, such as generation of household hazardous waste, would be expected to be reduced, as there would be one-fifth fewer residential units.

The County has not identified specific roads as emergency evacuation routes but encourages residents to learn their local roads in preparation for an emergency (Cathey pers. comm.); therefore, development under this alternative would not be expected to cause significant impacts on emergency response or evacuation plans. Though this impact would be similar under the Reduced-Density Alternative because there would be less development and fewer residences, this impact would of lesser magnitude than under the proposed project.

Although development under this alternative would introduce new fire hazards or fire risk to people and structures in the project area, existing County policies related to fire hazards and fire minimization would be enforced and subdivision plans would need to be approved by the El Dorado County Fire District. Because there would be less development, fewer residences, and fewer residents, the risk of fire to people and structures would be less under the Reduced-Density Alternative than under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the Reduced-Density Alternative would be similar to those of the proposed project but of a lesser magnitude. Under the Reduced-Density Alternative, residential acreage could increase to 523 acres and open space acreage could decrease to approximately 217 acres (the proposed project has 360 acres of residential use and 335 acres of open space); however, the amount of dwelling units would be reduced to 148. As with the proposed project, such impacts would be minimized and would be less than significant through compliance with the latest NPDES and other water quality requirements (i.e., Construction General Permit, Small MS4 Permit, WDRs for dewatering, other federal and state regulations, County plan standards, and County and other local ordinances). In addition, Mitigation Measures BIO-1a through BIO-1c, BIO-3a, and BIO-3b, as recommended for the proposed project, would be required to reduce potential water quality impacts where wetlands or other waters may be affected by construction.

Regarding post-development impacts, proper measures to maintain water quality after construction would be required as under the proposed project. Source and treatment control measures contained in the State Water Board MS4 Permit Order 2013-0001-DWQ, the County SWMP (El Dorado County 2004) and the County Drainage Manual (El Dorado County 2020), and/or USEPA guidance and other related guidance documents would be implemented. General site housekeeping and design control measures incorporated into the project design can include conserving natural areas, protecting slopes and channels, and minimizing impervious areas. Treatment control measures may include use of vegetated swales and buffers, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other LID technology measures. These measures can also help comply with the Central Valley Water Board Basin Plan, which specifies water quality objectives and beneficial use requirements.

The overall development footprint associated with the Reduced-Density Alternative would be larger, but there would be fewer post-construction related impacts associated with the Reduced-Density Alternative than under the proposed project.

Land Use Planning and Agricultural Resources

Development under the Reduced-Density Alternative, like the proposed project, would result in the conversion of currently undeveloped land that is designated for rural residential uses to low density residential uses. Like the proposed project, the Reduced-Density Alternative would require amendments to the County General Plan land use designations in order to increase the density of the project site in specified areas. Implementation of the Reduced-Density Alternative would, similar to the proposed project, result in a less-than-significant impact related to inconsistency with agricultural zoning because the area is zoned Rural Lands, which is intended primarily for residential uses. The Reduced-Density Alternative would not result in any other significant impacts related to agriculture or land use. Therefore, impacts under the Reduced-Density Alternative would be the same as those under the proposed project.

As with the proposed project, the Reduced-Density Alternative would not physically divide an existing community.

Noise and Vibration

The Reduced-Density Alternative would construct fewer lots than would the proposed project. Thus, this alternative would require less construction activity that could occur over a shorter construction period than what would be required for the proposed project, because fewer buildings would be constructed. Therefore construction-related noise impacts could be less under the Reduced-Density Alternative than under the proposed project. However, it is possible that construction could occur over a longer period of time depending on construction phasing. It is also possible the same construction equipment assumed to operate simultaneously for the proposed project analysis could operate simultaneously during construction of this alternative, resulting in comparable construction noise levels. In addition, the land use pattern of this alternative does not differ substantially from the land use pattern of the proposed project. Mitigation Measure NOI-1a, as discussed in Chapter 3, Section 3.10, *Noise and Vibration*, would be implemented to reduce construction impacts on existing residences to a less-than-significant level. Impacts would be similar to the proposed project, but of a lesser magnitude because fewer people would be exposed to construction noise and for a shorter duration.

Because there would be less development under the Reduced-Density Alternative than under the proposed project, impacts related to traffic and operational noise would be less than under the proposed project. Mitigation Measure NOI-1b could be necessary, as with the proposed project, to avoid an exceedance of the County's compatibility standard. Similar to the proposed project, operational impacts would be significant and unavoidable even with implementation of Mitigation Measure NOI-1b, but impacts for the Reduced-Density Alternative would be less severe than under the proposed project.

Traffic noise impacts on the residence at 2080 Marble Valley Road would be less severe than under the proposed project, because less vehicle traffic would result in less operational noise. However, because of the proximity of the residence to the roadway, the traffic noise increase at this residence could be substantial. Impacts would be less severe than under the proposed project, but could still be significant and unavoidable under the Reduced-Density Alternative.

As under the proposed project, development under the Reduced-Density Alternative would not likely require impact equipment that could generate substantial ground vibrational impacts, because the type of land uses and the resulting construction activity would not differ substantially from the

proposed project. However, similar to the proposed project, implementation of the Reduced-Density Alternative could involve some blasting that would generate vibration. The amount of blasting and areas where blasting would be required is not known at this time for the proposed project or the Reduced-Density Alternative. Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Impacts would be the same as the proposed project, because blasting activities could be similar even though overall construction would be less.

Because the project site would be the same for the Reduced-Density Alternative as it would be for the proposed project, development under the Reduced-Density Alternative would also not be located within the noise contours of any public or private airports and would not change airport operations such that there would be changes in the airport noise contours that would expose people to substantial noise.

Population and Housing

Compared with the proposed project, development of the Reduced-Density Alternative would reduce the total number of dwelling units from 800 to 148. Using unincorporated El Dorado County's average household size of 3.06 people per unit, occupancy of 148 new dwelling units associated with this alternative would be expected to increase the county's population by approximately 453 people, which represents 19% of the anticipated 2,336 residents projected for the proposed project. This alternative would induce less population growth than the proposed project would induce.

The project area currently contains 6 housing units. Therefore, as with the proposed project, development under the Reduced-Density Alternative has the potential to displace these existing housing units. Like the proposed project, this alternative would provide housing units in excess of those displaced and would not necessitate the construction of replacement housing elsewhere. Impacts would be the same as those of the proposed project.

Public Services and Utilities

The impacts related to public services and utilities under the Reduced-Density Alternative would be similar to those under the proposed project but of a lesser magnitude. Fewer dwelling units and, therefore, fewer residents are expected under this alternative, resulting in less demand on fire and police services. This alternative would result in 101 school-age children rather than 542 as under the proposed project, resulting in less demand on schools.[2] The El Dorado Union High School District and the Buckeye Union School District collect taxes via the El Dorado Schools Financing Authority Community Facilities District that provides funds for capital facilities to serve students generated from new development (SchoolWorks, Inc. 2018). Increased school enrollment would not cause significant environmental effects; rather, it would cause only social effects. Similarly, impacts on libraries are of a social nature and would not have environmental effects.

The Reduced-Density Alternative would result in nearly a quarter of the demand on wastewater conveyance and treatment as the proposed project. Whereas the proposed project would result in a demand of 0.19 million gallons per day (mgd), the Reduced-Density Alternative would result in 0.04 mgd.[3] Therefore the Reduced-Density Alternative would result in 0.15 mgd less demand for

[2] Using student generation rates as stated in Chapter 3, Section 3.12, *Public Services and Utilities,* Table 3.12-9-5.

[3] 148 low and medium density residential units * 240 gpd/EDU = 35,520 gpd average dry weather flow, or 0.04 mgd.

wastewater services than the proposed project. The Deer Creek Wastewater Treatment Plant (WWTP) is permitted for 3.6 mgd average dry weather flow and currently treats an average of 2.64 mgd. The addition of 0.04 mgd of demand from the Reduced-Density Alternative would result in a total of 2.68 mgd, which would not exceed the permitted capacity of 3.6 mgd.

The projected potable water demand of the Reduced-Density Alternative would be approximately one-third of the proposed project's demand for potable water. Whereas the proposed project would result in a residential demand of 475 acre-feet per year (AFY) in 2035, the projected potable water demand for the Reduced-Density Alternative's residential uses in 2035 would be 154 AFY.[4] Therefore, the Reduced-Density Alternative would result in a potable water demand of 321 AFY less than needed for the proposed project.

With a total of 148 residential units, the Reduced-Density Alternative would result in less demand for solid waste services than needed for the proposed project. The proposed project would generate 1,565 tons of solid waste per year, whereas the Reduced-Density Alternative's population of 453 would generate 303 tons of solid waste per year.[5] Like the proposed project, the impact would be less than significant.

The Reduced-Density Alternative would also result in a decreased demand on recycled water, dry utilities, electricity, natural gas, and other energy demands. The same energy- and resource-conserving effects described under Impact PSU-8 in Chapter 3, Section 3.12, *Public Services and Utilities*, for the proposed project would result under this alternative. Because the number of residential units and overall development square footage associated with the Reduced-Density Alternative would be less than under the proposed project, the construction- and operation-related effects would also be of a lesser magnitude, causing less demand for public services, utilities, and energy.

Recreation

Development under the Reduced-Density Alternative would increase the population in an area currently deemed deficient in recreational resources. Using the County's park-planning household size of 3.3 people per single-family residential unit, this alternative would be expected to introduce up to 488 new park users into the area, compared with the 2,640 new park users anticipated for the proposed project. New park users under the Reduced-Density Alternative represent 18% of the new users associated with the proposed project. The Reduced-Density Alternative includes 217 acres of open space but no new developed public parkland, thereby not meeting the parkland requirement of approximately 2.4 acres for 488 residents. As described in Chapter 3, Section 3.13, *Recreation*, the proposed project would be deficient in parkland by 5.2 acres. Using the same standards, the Reduced-Density Alternative would result in a deficiency of 2.4 acres of parkland. Because the Reduced-Density Alternative would introduce fewer residents to the area per acre of existing parkland, compared with the proposed project, fewer new residents would be expected to use existing park facilities under the Reduced-Density Alternative. Effects of the Reduced-Density Alternative on the deterioration of existing neighborhood parks would be significant, though less than those associated with the proposed project. However, implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Section 3.13, requiring parkland dedication of 2.4

[4] 148 residential units at a density of 0.2 du/ac * 1.04 demand factor = 154 AFY in 2035.

[5] 453 people * 0.67 ton of solid waste per person per year.

acres or payment of in-lieu fees to the El Dorado Hills CSD, would mitigate this impact of the Reduced-Density Alternative to less than significant.

The Reduced-Density Alternative would not involve construction of any new parks and, therefore, could result in the need to expand existing facilities or construct new facilities offsite to accommodate increased population. As described in Chapter 3, Section 3.13, *Recreation*, the proposed project would result in a deficiency of 5.2 acres of parkland. Using the same parkland dedication standards, the Reduced-Density Alternative would result in a parkland deficiency of 2.4 acres. Compared with the proposed project, this alternative could, therefore, have fewer adverse physical effects on the environment associated with construction of recreational facilities because it would require fewer offsite acres to be developed. Development under the Reduced-Density Alternative for offsite parkland would require parkland dedication or payment of in-lieu fees to the CSD, which would mitigate any impact of the Reduced-Density Alternative. Implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Chapter 3, Section 3.13, *Recreation*, requiring parkland dedication or payment of in-lieu fees to the CSD, would mitigate this impact of the Reduced-Density Alternative to less than significant. Because the location of any such offsite recreational facilities has not been determined, and no plan identifies actual facilities or locations for future projects, precise environmental impacts associated with them would be speculative to address at this time. Project-specific environmental review would be required to determine the actual impacts of new park facilities, depending on the precise type and location of those facilities.

Transportation and Circulation

The Reduced-Density Alternative would provide for a density of about 0.2 dwelling units per acre, which would result in the development of up to 148 single-family dwelling units at the project site (Table 4-4).

Table 4-4. Trip Generation under the Reduced-Density Alternative and the Proposed Project

		Trips		
Land Use	Single-Family Dwelling Units	Daily	A.M.	P.M.
Reduced-Density Alternative	148	1,409	111	149
Proposed Project	800	7,616	600	801
Difference (Reduced-Density Alternative – Proposed Project)	-652	-6,207	-489	-652

The overall impacts on transportation under the Reduced-Density Alternative would be similar to the proposed project (additional traffic volumes associated with residential development). As summarized in Table 4-43, the Reduced-Density Alternative provides for the development of 148 single-family units on the project site, instead of the 800 units proposed, a reduction of 652 single-family units (or about 82%), resulting in about 6,200 fewer trips per day added to area roadways compared with the proposed project. The VMT efficiency of the Reduced-Density Alternative, measured in terms of VMT per capita, would be similar to the proposed project because the location is the same but less efficient than the proposed project since the residential development would be lower density. The impact of the Reduced Density Alternative would be significant and unavoidable as under the proposed project.

. Demand for transit services and facilities associated with this alternative would be anticipated to be approximately 1/4 of that estimated for the proposed project. Because demand exceeds capacity at existing park-and-ride facilities, however, this could result in a significant impact, requiring mitigation similar to that proposed under Mitigation Measure CUM-1.

Consideration of Screening Criteria

Ability to Meet Project Objectives

The County's primary objective for the proposed project is to create development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community. The Reduced-Density Alternative would make efficient and feasible use of existing infrastructure, but it would not necessarily promote a sense of community. It would preserve 116 acres less of open space, which would not meet objectives to preserve large amounts of open space or to incorporate the site's natural features identified by the project applicant, as well as the proposed project. Additionally, the low density development would not help to create a pedestrian-friendly, walkable community as there would be no trails or pedestrian paths and no parks within walking distance.

Impact Avoidance

The Reduced-Density Alternative would result in development of approximately 82% fewer dwelling units and would, therefore, result in a reduction of impacts related to population growth such as air quality, GHG emissions, noise, and services/utilities demand. Impacts on air quality, noise, population and housing, and public services would be reduced. Impacts on geology, hydrology, and paleontology would be reduced because less construction would take place. Impacts on biological resources would be less because even though more acreage would be in residential use, fewer residences would be constructed. However, because fewer acres would be preserved in open space, impacts on wildlife movement would be greater. Because the development footprint would affect more of the LRVHD, impacts on that particular cultural resource would be greater, though impacts on unknown cultural resources would likely be less because there would be fewer residences constructed.

Feasibility

Implementation of the Reduced-Density Alternative would be possible as described because County requirements for construction and oak preservation have been considered. This alternative would result in approximately 82% fewer residential units than under the proposed project; therefore, the Reduced-Density Alternative may not be economically feasible for the project applicant.

4.3.3 Alternative 3—50% Reduced Density

Compared with the proposed project, the 50%-Reduced-Density Alternative would reduce the total number of dwelling units from 800 to 400 within the same 407-acre residential development footprint as the proposed project. Alternative 3, the 50%-Reduced-Density Alternative, is intended to reduce impacts related to population, air quality, and noise and, secondarily, impacts on oaks. Figure 4-3 illustrates the land use plan and zoning. The perimeter lots shown at 5-acre lots under

the proposed project would remain at 5 acres under this alternative, but the development density for all other development areas would be reduced by about half. The open space and development acreage would be the same as the proposed project, but no parks are proposed under this alternative. The same offsite improvements required for the proposed project would be required for the 50%-Reduced-Density Alternative.

Aesthetics

Proposed development in the project area would be reduced under the 50%-Reduced-Density Alternative. Similar to the proposed project, the same areas proposed for development would be developed under this alternative, but the entire project area would only have 400 dwellings compared with 800. Residential homes under the 50%-Reduced-Density Alternative could have footprints that are the same size as footprints as the proposed project or the footprints could be slightly larger. Therefore, construction of the 50%-Reduced-Density Alternative would require the removal of fewer oak trees and less vegetation associated with manzanita chaparral and grasslands, which are an onsite visual amenity, because less area would need to be cleared to build homes under this alternative. Both the proposed project and 50%-Reduced-Density Alternative would result in new sources of nighttime light in an area that is not well lit. However, the 50%-Reduced-Density Alternative would result in less lighting, because there would be fewer residences than under the proposed project. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e, AES-2, and AES-4 established for the proposed project would reduce visual impacts under the 50%-Reduced-Density Alternative. All of these factors would reduce the 50%-Reduced-Density Alternative's impact on scenic vistas and visual resources because the site would appear less developed than under the proposed project. The 50%-Reduced-Density Alternative, like the proposed project, would not result in visual impacts on scenic resources along scenic highways.

Air Quality

The types of air quality impacts under the 50%-Reduced-Density Alternative would be similar to those under the proposed project, but of a lesser magnitude. As with the proposed project, construction and combined construction and operation of new buildings would generate criteria pollutant emissions that could exceed the EDCAQMD's significance thresholds. Because the extent of construction and operational activities are less under the 50%-Reduced-Density Alternative than under the proposed project, criteria pollutant emissions generated by the 50%-Reduced-Density Alternative would likely be lower than those estimated for the proposed project. Mitigation Measures AQ-2a through AQ-2e, identified in Section 3.2, *Air Quality*, Mitigation Measures GHG-1 and GHG-2, identified in Section 3.6, *Greenhouse Gas Emissions,* and Mitigation Measure TRA-2, identified in Chapter 3.14, *Transportation and Circulation*, could be implemented to reduce emissions, but the potential to exceed EDCAQMD's thresholds and conflict with applicable air quality attainment plans would remain.

Implementation of the 50%-Reduced-Density Alternative could expose new residents and adjacent sensitive receptors to significant health risks from criteria pollutants and TACs, including DPM, generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the 50%-Reduced-Density Alternative would be less than that of the proposed project because there would be less construction and fewer operational emission sources. Construction TAC emissions would be reduced through Mitigation Measures AQ-2b, AQ-2c, and GHG-1. However, like the proposed project, there may be instances where specific conditions preclude the reduction of

health risks from exposure to project-generated TACs during construction to below adopted thresholds, resulting in a significant impact.

Similar to the proposed project, receptors could be exposed to significant NOA impacts. The requirements identified in Mitigation Measure AQ-3, discussed in Section 3.2, *Air Quality*, would reduce any significant NOA impacts to a less-than-significant level.

Like the proposed project, the 50%-Reduced-Density Alternative would not result in new or worsened odors that would affect a substantial number of people, and odor impacts would be less than significant. Similarly, CO modeling for the proposed project showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur, and the same conclusion would be expected for the 50%-Reduced-Density Alternative, which would result in fewer vehicle trips and congestion.

Biological Resources

The impacts on biological resources under the 50%-Reduced-Density Alternative as compared with the proposed project would be similar for riparian habitat and slightly less for oak woodland, chaparral, annual grassland habitats, and waters of the United States. The amount of open space under this alternative would be the same as that for the proposed project, but there would be less impacts within each area of development due to the reduced density. Impacts under this alternative compared with the proposed project would be slightly smaller for oak woodland because more oak canopy would be retained within the developed areas.

Impacts on special-status plant species would be similar to those under the proposed project, as the same general areas would be developed. Therefore, Layne's ragwort would be avoided as it would under the proposed project, and there would be potential impacts on Bisbee Peak rush-rose that could be reduced with the implementation of measures similar to Mitigation Measures BIO-5a and BIO-5b. Impacts on special-status wildlife species would generally be similar to slightly less than those of the proposed project, except for those species that use oak woodland, (including white-tailed kite, burrowing owl, Blainville's horned lizard, and special-status bats), for which the impacts could be smaller. However, the increased retention of oak woodland would be within developed parcels and would be more fragmented than the oak woodland in open space. Impacts on wildlife movement would be similar to the proposed project.

Mitigation measures BIO-1 through BIO-21, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Chapter 3, Section 3.3, *Biological Resources*), would still be needed under this alternative to ensure that impacts on biological resources are reduced to a less-than-significant level. Because overall the extent of development under the 50%-Reduced-Density Alternative would be less than under the proposed project, the impact on most biological resources identified in the project area would be of a smaller magnitude.

Cultural Resources

Impacts on built resources under the 50%-Reduced-Density Alternative would be the same as those of the proposed project. Mitigation Measure CUL-1 identified in Section 3.4, *Cultural Resources*, would be necessary to keep impacts on built environment resources to a less-than-significant level.

The impacts on archaeological resources under the 50%-Reduced-Density Alternative would be similar to those under the proposed project because the project footprint would be the same.

Because of the reduced density, there is the potential that the construction of fewer residences would have less potential to affect unknown buried resources; however, it is likely that much of the parcels that are not used for actual house construction would be otherwise affected, through installation of pools, outbuildings, and landscaping.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The 50%-Reduced-Density Alternative would result in the development of residential land uses, open space, and roadways. The number of residential units that would be developed under this alternative would be less than that developed under the proposed project but would cover the same area. As a result, less construction activity would be required under the 50%-Reduced-Density Alternative, which would lead to less overall construction impacts than the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, and earthquake safety. However, the overall types of potential impacts would not be different under the 50%-Reduced-Density Alternative than under the proposed project, and Mitigation Measures GEO-3a, GEO-3b, GEO-3c, and GEO-4 identified in Section 3.5, *Geology, Soils, Minerals, and Paleontological Resources*, would be effective.

Minerals Resources

The impacts on mineral resources under the 50%-Reduced-Density Alternative would be similar to those of the proposed project. Construction under the 50%-Reduced-Density Alternative would occur on the same parcels as the proposed project and, therefore, within the same MRZs. Because there would be less construction associated with fewer residences, the impacts on mineral resources under this alternative would be less than those under the proposed project. As with the proposed project, there would be a less-than-significant impact on known important mineral resources and no impact on the availability of important mineral resource sites.

Paleontological Resources

The impacts on paleontological resources under the 50%-Reduced-Density Alternative would be similar to those under the proposed project but of a lesser magnitude. Under the 50%-Reduced-Density Alternative, the construction footprint would be the same as the proposed project but less construction would occur because fewer residences would be constructed. As with the proposed project, construction could occur in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium, and, therefore, could result in impacts on paleontological resources. Because the extent of construction is less under the 50%-Reduced-Density Alternative than under the proposed project, the impact would be of a lesser magnitude.

Greenhouse Gas Emissions

GHG impacts under the 50%-Reduced-Density Alternative would be similar to those under the proposed project, but of a lesser magnitude. Similar to criteria air pollutant emissions, construction and operational GHG emissions associated with the 50%-Reduced-Density Alternative would likely be lower than those estimated for the proposed project because of the reduced level of development. Compliance with LRVSP Sustainability Element policies would reduce construction and operational GHG emissions consistent with the relative reductions estimated for the proposed project.

Although GHGs resulting from buildout of the 50%-Reduced-Density Alternative may be less than the proposed project, development would generate new vehicle trips and consume fossil fuels, which could conflict with the state's decarbonization and carbon neutrality goal. The requirements listed in Mitigation Measures GHG-1, GHG-2, AQ-2b, and AQ-2c, as proposed for the project in Section 3.6, *Greenhouse Gas Emissions*, or similarly effective measures would still be needed under the 50%-Reduced-Density Alternative. However, even with mitigation, the 50%-Reduced-Density Alternative's cumulative contribution of GHG emissions would be significant and unavoidable, and the alternative could conflict with the 2017 Scoping Plan and the state's long-time climate change goals in AB 1279 and the 2022 Scoping Plan.

Hazards and Hazardous Materials

The impacts related to hazards and hazardous materials under the 50%-Reduced-Density Alternative would be similar to those under the proposed project but of a lesser magnitude. As a result of developing fewer residential units, less construction activity would be required under the 50%-Reduced-Density Alternative, which would lead to fewer overall construction impacts associated with hazardous materials use compared with the proposed project. Operation-related impacts would also be reduced by half compared with the proposed project. There would also be 50% less residential impacts, such as generation of household hazardous waste. However, as compared with the proposed project, impacts related to significant hazards to the public or environment, such accidents or spills involving the release of hazardous materials into the environment or significant hazards through the routine use or disposal of hazardous materials, would be similar under this alternative.

The County has not identified specific roads as emergency evacuation routes but encourages residents to learn their local roads in preparation for an emergency (Cathey pers. comm.); therefore, like the proposed project, this alternative would not be expected to result in significant impacts on emergency response or evacuation plans. Though this impact would be similar under the 50%-Reduced-Density Alternative because there would be less development and fewer residences, this impact would of lesser magnitude than under the proposed project.

Although development under this alternative would introduce new fire hazards or risk for people and structures in the project area, existing County policies related to fire hazards and fire minimization would be enforced, and subdivision plans would need to be approved by the El Dorado Hills Fire Department. Because there would be less development, fewer residences, and fewer residents, the risk of fire to people and structures would be slightly less under the 50%-Reduced-Density Alternative than under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the 50%-Reduced-Density Alterative would be similar to those of the proposed project but of a slightly lesser magnitude. Under the 50%-Reduced-Density Alternative, the open space and development acreage would be the same as the proposed project, but the development density would be reduced by about half. As with the proposed project, such impacts would be minimized and would be less than significant through compliance with the latest NPDES permit and other water quality requirements (i.e., Construction General Permit, Small MS4 Permit, WDRs for dewatering, other federal and state regulations, County plan standards, and County and other local ordinances). In addition, Mitigation Measures BIO-1a through BIO-1c, BIO-3a, and BIO-3b, as recommended for the proposed project, would be required

to reduce potential water quality impacts where wetlands or other waters may be affected by construction.

Regarding post-development impacts, this alternative would be expected to result in less stormwater runoff from rooftops, hardscaping, and driveways at residential units compared with the proposed project. However, runoff from roadways would be the same as under the proposed project because the circulation network would be the same. Proper measures to maintain water quality after construction would be required as they are under the proposed project. Source and treatment control measures contained in the State Water Board MS4 Permit Order 2013-0001-DWQ, the County SWMP (El Dorado County 2004) and the County Drainage Manual (El Dorado County 2020), and/or USEPA guidance and other related guidance documents would be implemented. General site housekeeping and design control measures incorporated into the project design can include conserving natural areas, protecting slopes and channels, and minimizing impervious areas. Treatment control measures may include use of vegetated swales and buffers, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other LID technology measures. These measures can also help comply with the Central Valley Water Board Basin Plan, which specifies water quality objectives and beneficial use requirements.

Land Use Planning and Agricultural Resources

Development under the 50%-Reduced-Density Alternative, like the proposed project, would result in the conversion of currently undeveloped land that is designated for rural residential uses to low density residential uses. Like the proposed project, the 50%-Reduced-Density Alternative would likely require amendments to the County General Plan land use designations to increase the density of the project site in specified areas. Implementation of the 50%-Reduced-Density Alternative would have the same footprint as the proposed project and, therefore, result in the same less than significant impact related to inconsistency with agricultural zoning, as the area is zoned Rural Lands, which is intended primarily for residential uses. The impacts under this alternative would be the same as under the proposed project. As with the proposed project, the 50%-Reduced-Density Alternative would not physically divide an existing community. Impacts related to County General Plan consistency and conflict with agricultural zoning under the 50%-Reduced-Density Alternative would be less than significant, as they are under the proposed project.

Noise and Vibration

The 50%-Reduced-Density Alternative would construct half the number of units as the proposed project; thus, this alternative would require less construction activity that could occur over a shorter construction period than what would be required for the proposed project, because fewer buildings would be constructed, and, therefore, impacts from construction noise could be less than under the proposed project. However, it is possible that construction could occur over a longer period of time depending on construction phasing. It is also possible that the same construction equipment assumed to operate simultaneously for the proposed project analysis could operate simultaneously during construction of this alternative, resulting in comparable construction noise levels. In addition, the land use pattern under this alternative is similar to the land use pattern of the proposed project. Therefore, both the proposed project and the 50%-Reduced-Density Alternative would result in construction noise near existing residences, but the 50%-Reduced-Density Alternative would expose fewer new residents, as fewer residences would be constructed, to construction noise and for a shorter duration. Mitigation Measure NOI-1a, as discussed in Chapter 3, Section 3.10, *Noise and Vibration*, would be implemented to reduce construction impacts on existing

residences to a less-than-significant level. Impacts would be similar to the proposed project, but of a lesser magnitude.

Because there would be less development under the 50%-Reduced-Density Alternative than under the proposed project, impacts related to traffic and operational noise would be less than under the proposed project. Mitigation Measure NOI-1b could be necessary as it is for the proposed project to avoid an exceedance of the County's compatibility standard.

Traffic noise impacts on the residence at 2080 Marble Valley Road would be less severe than under the proposed project, because less vehicle traffic would result in less operational noise. However, as with the proposed project, because of the proximity of the residence to the roadway, the traffic noise increase at this residence could be substantial. Impacts would be less severe than under the proposed project, but could still be significant and unavoidable under the 50%-Reduced-Density Alternative.

Development under the 50%-Reduced-Density Alternative would not likely require impact equipment that could generate substantial ground vibrational impacts. However, similar to the proposed project, implementation of the 50%-Reduced-Density Alternative could involve some blasting that would generate vibration. The amount of blasting and areas where blasting would be required is not known at this time for the proposed project or the 50%-Reduced-Density Alternative. Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Impacts would be the same as the proposed project, because blasting activities could be similar even though overall construction would be less.

Because the project site would be the same for the 520%-Reduced-Density Alternative as it would be for the proposed project, development under this alternative would also not be located within noise contours of any public or private airports and would not change airport operations such that there would be changes in airport noise contours that would expose people to substantial noise.

Population and Housing

The 50%-Reduced-Density Alternative would result in development of up to 400 dwelling units. Using unincorporated El Dorado County's average household size of 3.06 people per unit, occupancy of the 400 dwelling units associated with this alternative would be expected to increase the County's population by approximately 1,224 people, which represents approximately 50% of the anticipated 2,336 residents associated with the proposed project. This alternative would induce less population growth than the proposed project would induce but would still result in a significant and unavoidable impact.

The project area currently contains 6 housing units. Therefore, as with the proposed project, development under this alternative has the potential to displace these existing housing units. Like the proposed project, this alternative would provide housing units in excess of those displaced and would not necessitate the construction of replacement housing elsewhere. Impacts would be the same as those of the proposed project.

Public Services and Utilities

Impacts on public services and utilities under the 50%-Reduced-Density Alternative would be similar but less than those of the proposed project. With 50% fewer dwelling units, fewer residents and structures would result in less demand on fire and police services. It would result in 271 school-

age children rather than 542 under the proposed project, which would result in a reduced demand on schools.[6] The El Dorado Union High School District and the Buckeye Union School District collect taxes via the El Dorado Schools Financing Authority Community Facilities District, which provides funds for capital facilities to serve students generated from the new development (SchoolWorks, Inc. 2018). Increased school enrollment would not cause significant environmental effects; rather, it would cause only social effects. Similarly, impacts on libraries are of a social nature and would not have environmental effects.

The 50%-Reduced-Density Alternative would result in half the demand on wastewater. Whereas the proposed project would result in a demand of 0.19 mgd, the 50%-Reduced-Density Alternative would result in 0.09 mgd.[7] Therefore the 50%-Reduced-Density Alternative would result in 0.09 mgd less (or approximately half) demand for wastewater services than needed for the proposed project. The Deer Creek WWTP is permitted for 3.6 mgd average dry weather flow and currently treats an average of 2.64 mgd. The addition of 0.09 mgd of demand from the 50%-Reduced-Density Alternative would result in a total of 2.73 mgd, which would not exceed the permitted capacity of 3.6 mgd.

The projected potable water demand of the 50%-Reduced-Density Alternative would be less than the proposed project's demand for potable water. Whereas the proposed project would result in a residential demand of 475 AFY in 2035, the projected potable water demand for the 50%-Reduced-Density Alternative's residential uses in 2035 would be approximately 320 AFY.[8] Therefore, the 50%-Reduced-Density Alternative would result in approximately 155 AFY less demand for potable water than needed for the proposed project.

With a total of 400 residential units, the 50%-Reduced-Density Alternative would result in less demand for solid waste services than needed for the proposed project. The proposed project would generate 1,565 tons of solid waste per year, whereas the 50%-Reduced-Density Alternative's population of 1,224 would generate 781 tons of solid waste per year.[9]

The 50%-Reduced-Density Alternative would also result in a decreased demand on recycled water, dry utilities, electricity, natural gas, and other energy demands. As described in Chapter 3, Section 3.12, *Public Services and Utilities*, Impact PSU-8, the same energy- and resource-conserving effects that would occur under the proposed project would occur under this alternative. Because the number of residential units and overall development square footage associated with the 50%-Reduced-Density Alternative would be smaller than under the proposed project, the construction- and operation-related effects would also be of a lesser magnitude, causing less demand for public services, utilities, and energy.

Recreation

Development under the 50%-Reduced-Density Alternative would increase the population in an area currently deemed deficient in recreational resources. Using the County's park-planning household size of 3.3 people per single-family residential unit, this alternative would be expected to introduce approximately 1,320 park users into the area, compared with 2,640 people, or 50% of the park

[6] Using student generation rates as stated in Chapter 3, Section 3.12, *Public Services and Utilities,* Table 3.12-9.

[7] 400 low- and medium-density residential units * 240 gpd/EDU = 96,000 gpd average dry weather flow, or 0.09 mgd.

[8] 400 low- and medium-density residential units * 0.8 demand factor = 320 AFY in 2035.

[9] 1,224 people * 0.67 ton of solid waste per person per year.

users, anticipated under the proposed project. However, this alternative would not provide any new public parkland. As described in Chapter 3, Section 3.13, *Recreation*, the proposed project would be deficient in parkland by 5.2 acres, despite the provision of an 8-acre park. Using the same standards, the 50%-Reduced-Density Alternative would result in a deficiency of 6.6 acres of parkland. Because the 50%-Reduced-Density Alternative would introduce more residents to the area per acre of existing parkland, compared with the proposed project, more new residents would be expected to use existing park facilities under the 50%-Reduced-Density Alternative. Effects of this alternative on the deterioration of existing neighborhood parks would, therefore, be expected to be greater than those associated with the proposed project. Implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Section 3.13, requiring dedication of 6.6 acres of parkland or payment of in-lieu fees to the CSD would mitigate this impact to a less than significant level.

The 50%-Reduced-Density Alternative would not involve construction of any new parks and therefore could result in the need to expand existing facilities or construct new facilities offsite to accommodate increased population. As stated above, the proposed project would be deficient in parkland by 5.2 acres, compared with a deficiency of 6.6 acres of parkland for the 50%-Reduced-Density Alternative. The 50%-Reduced-Density Alternative could require greater expansion or construction of offsite park facilities than required under the proposed project. This alternative could, therefore, have more adverse physical effects on the environment associated with construction of recreational facilities because it would require more offsite parkland acres to be developed. These effects, like those of the proposed project, would be significant; however, development under this alternative for offsite parkland would require parkland dedication or payment of in-lieu fees to the CSD, which would mitigate any impacts. Implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Chapter 3, Section 3.13, *Recreation,* requiring parkland dedication or payment of in-lieu fees to the CSD, would mitigate this impact of the 50%-Reduced-Density Alternative to less than significant. Because the location of any such offsite recreational facilities has not been determined, and no plan identifies actual facilities or locations for future projects, precise environmental impacts associated with them would be speculative to address at this time. Project-specific environmental review would be required to identify actual impacts of new park facilities depending upon the precise type and location of those facilities.

Transportation and Circulation

The 50%-Reduced-Density Alternative would provide for one-half the density as currently proposed by the LRVSP, which would result in development of up to 400 single-family dwelling units at the project site (Table 4-5).

Table 4-5. Trip Generation under the 50%-Reduced-Density Alternative and the Proposed Project

Land Use	Single-Family Dwelling Units	Trips		
		Daily	A.M.	P.M.
50%-Reduced-Density Alternative	400	3,808	300	401
Proposed Project	800	7,616	600	801
Difference (50%-Reduced-Density Alternative – Proposed Project)	-400	-3,808	-300	-400

The overall impacts on transportation under the 50%-Reduced-Density Alternative would be similar to the proposed project (additional traffic volumes associated with residential development). As summarized in Table 4-5, the 50%-Reduced-Density Alternative provides for the development of 400 single-family units on the project site, instead of the 800 units proposed, a reduction of 400 single-family units (or about 50%), resulting in about 3,800 fewer trips per day added to area roadways compared with the proposed project. The VMT efficiency of the 50% Reduced-Density Alternative, measured in terms of VMT per capita, would be similar to the proposed project because the location is the same and would have a similar residential mix to the proposed project. The impact of the 50% Reduced Density Alternative would be significant and unavoidable as under the proposed project.

Demand for transit services and facilities associated with this alternative would be half that estimated for the proposed project. However, because demand exceeds capacity at existing park-and-ride facilities, this could result in a significant impact, requiring mitigation similar to that proposed under Mitigation Measure CUM-1.

Consideration of Screening Criteria

Ability to Meet Project Objectives

The County's primary objective for the proposed project is to create development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community. The 50%-Reduced-Density Alternative would make efficient and feasible use of existing infrastructure.

Impact Avoidance

The 50%-Reduced-Density Alternative would result in development of half the dwelling units compared to the proposed project and would, therefore, result in a reduction of impacts related to population growth such as air quality, GHG emissions, noise, and services/utilities demand. Impacts on geology, hydrology, and paleontology would be reduced because less construction would take place. Impacts on biological resources and cultural resources would be less because half the number of residences would be constructed on the same acreage. Only the impacts on recreation would be greater because no parkland would be included in this alternative.

Feasibility

Implementation of the 50%-Reduced-Density Alternative would be possible as described because County requirements for construction and oak preservation would be satisfied as this alternative occupies the same footprint as the proposed project. This alternative would result in 50% fewer residential units than the proposed project and, therefore, may not be economically feasible for the project applicant.

4.3.4 Alternative 4—Wetlands Avoidance and Historic Resources Protection

Alternative 4, Wetlands Avoidance and Historic Resources Protection, (Wetlands-Avoidance Alternative) would result in the same number of dwelling units as the proposed project (800) on 31

fewer acres in roughly the same project footprint. This alternative is intended to avoid all wetlands and provide protection to the historic resources as conceptually shown in Figure 4-4. Under this alternative, bridges—14 in total—would be constructed over waterways and wetlands to avoid wetlands that would be affected under the LRVSP as proposed. Development would be restricted to areas outside the wetland setback areas, resulting in the availability of approximately 7.5 fewer acres (10 lots) of development area than under the proposed project. In addition, this alternative would incorporate the preservation of the historic resources associated with the old limestone mine into the proposed project. Approximately 23.7 fewer acres of development area, representing 37 lots, would be available due to avoidance of these historic resources. Combined, 31.2 fewer acres would be developed under this alternative because of the avoidance of wetlands and historic resources. This alternative would include an 8-acre park, identical to the proposed project.

To maintain the maximum number of developable lots at 800, the perimeter-area lots would be resized, from 5-acre lots under the proposed project (RSA-PD) to 1-acre lots under this alternative. Therefore, Alternative 4 would allow for the development of up to 800 lots. The same offsite improvements required for the proposed project would be required for this alternative.

Aesthetics

Proposed development acreage in the planning area would only be slightly reduced under this alternative by developing outside of the wetland setback areas. Bridges would not be noticeable, because they would be obscured by buildings associated with the proposed development. The configuration and land use patterns associated with this alternative would appear, visually, the same as under the proposed project, because the reduction in the amount of development along wetland corridors is not substantial enough to result in a perceptible difference between alternatives when seen in vista views or by viewers bordering the site. While historic resources associated with the old limestone mine would be preserved under this alternative and wetland corridors expanded, preserving visual amenities associated with the site, these features are currently not visible to existing viewers. Therefore, the Wetlands-Avoidance Alternative's impact on scenic vistas and visual resources would be the same as the proposed project. The Wetlands-Avoidance Alternative, like the proposed project, would not result in visual impacts on scenic resources along scenic highways.

Air Quality

The types of air quality impacts under the Wetlands-Avoidance Alternative would be comparable to those under the proposed project. As with the proposed project, construction and combined construction and operation of new buildings would generate criteria pollutant emissions that could exceed the EDCAQMD's significance thresholds. Although fugitive dust emissions from reduced site grading may be lower under this alternative, exhaust emissions may be slightly higher than under the proposed project as a result of bridge construction. Operational emissions are expected to be similar to the proposed project as the number of developable units would remain constant at 800. Mitigation Measures AQ-2a through AQ-2e, identified in Section 3.2, *Air Quality*, Mitigation Measures GHG-1 and GHG-2, identified in Section 3.6, *Greenhouse Gas Emissions,* and Mitigation Measure TRA-2, identified in Chapter 3.14, *Transportation and Circulation*, could be implemented to reduce emissions, but the potential to exceed EDCAQMD's thresholds and conflict with applicable air quality attainment plans would remain.

Implementation of the Wetlands-Avoidance Alternative could expose new residents and adjacent sensitive receptors to significant health risks from criteria pollutants and TACs, including DPM,

generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the Wetlands-Avoidance Alternative would be comparable to that of the proposed project. Construction TAC emissions would be reduced through Mitigation Measures AQ-2b, AQ-2c, and GHG-1. However, like the proposed project, there may be instances where specific conditions preclude the reduction of health risks from exposure to project-generated TACs during construction to below adopted thresholds, resulting in a significant impact.

Similar to the proposed project, receptors could be exposed to significant NOA impacts. The requirements identified in Mitigation Measure AQ-3, discussed in Section 3.2, *Air Quality*, would reduce any significant NOA impacts to a less-than-significant level.

Like the proposed project, the Wetlands-Avoidance Alternative would not result in new or worsened odors that would affect a substantial number of people, and odor impacts would be less than significant. Similarly, CO modeling for the proposed project showed that no new localized violations of the 1-hour or 8-hour ambient air quality standards would occur, and the same conclusion would be expected for the Wetlands-Avoidance Alternative, which would result in similar vehicle trips and congestion.

Biological Resources

The impacts on biological resources under the Wetlands-Avoidance Alternative as compared with the proposed project would be similar for riparian habitat, due to the location of one bridge, as well as for oak woodland, chaparral, and annual grassland habitats. All impacts on waters of the United States would be avoided by the use of clear span bridges at all road crossings and wetland setbacks within development areas. The amount of open space under this alternative would be the same as that for the proposed project.

Impacts on special-status plant species would be similar to those under the proposed project, with the avoidance of Layne's ragwort, but some loss of Bisbee Peak rush-rose. Impacts on special-status wildlife species that use wetlands or drainages would be reduced in comparison to the proposed project, due to the avoidance of wetland impacts under this alternative. Impacts on special-status wildlife species that occur in oak woodland, chaparral, and annual grassland would generally be similar to those of the proposed project. Impacts on wildlife movement would be similar to the proposed project.

Mitigation measures BIO-1 through BIO-21, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Chapter 3, Section 3.3, *Biological Resources*), would be needed under this alternative to ensure that impacts on biological resources are reduced to a less-than-significant level. Because overall the areal extent of construction is smaller under the Wetlands-Avoidance Alternative than under the proposed project, and because all impacts on wetlands would be avoided, the impact for most biological resources identified in the project area would be of a lesser magnitude.

Cultural Resources

Impacts on built resources under the Wetlands-Avoidance Alternative would be the same as under the proposed project. As with the proposed project, most of the built contributing elements to the LRVHD under this alternative are located in open space areas and would only be indirectly affected by project activities. These resources include the following 16 features: F03, F04, F07, F11, F12, F13, F14, F20, F23, F24, F25, F26, F27, F28, F29, and F30. Additionally, as with the proposed project, the

LRVHD contributing resource F48 (a culvert associated with an existing road) would only be indirectly affected. As under the proposed project, the five remaining contributing elements of the LRVHD would be directly affected. These five include feature F05, F34, F36, F37, and F44. Mitigation Measure CUL-1 identified in Section 3.4, *Cultural Resources*, would be necessary to keep impacts on built environment resources to a less-than-significant level.

Impacts on archaeological resources under this alternative would be the same as under the proposed project. The project would be designed to avoid historical resources and elements of the LRVHD would be preserved using the same mechanisms as under the proposed project. Slightly less acreage would be developed and therefore, the potential to encounter buried resources would be slightly less than under the proposed project.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils

The Wetlands-Avoidance Alternative would result in the development of residential land uses, open space, and roadways. The number of residential units that would be developed under this alternative would be the same as the proposed project but developed within 31.2 fewer acres. A total of 14 bridges would be constructed to avoid road impacts on wetlands. As a result, similar amounts of construction activity would be required under the Wetlands-Avoidance Alternative and the construction impacts would be similar to the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, and earthquake safety. There would be slightly different construction needs associated with the 14 bridges, but the site-specific investigations would address the same slope stability, expansive soils, and earthquake safety issues. The overall types and magnitude of potential impacts would not be different under the Wetland-Avoidance Alternative than under the proposed project. Mitigation Measures GEO-3a, GEO-3b, GEO-3c, and GEO-4, identified in Section 3.5, *Geology, Soils, Minerals, and Paleontological Resources*, would reduce impacts to a less-than-significant level.

Minerals Resources

The impacts on mineral resources under the Wetlands-Avoidance Alternative would be the same as those of the proposed project. Under the Wetlands-Avoidance Alternative, construction would occur on the same parcels as the proposed project and, therefore, within the same MRZs. As with the proposed project, and because the area of residential construction would be the same, there would be a less-than-significant impact on known important mineral resources, as with the proposed project, and no impact on the availability of important mineral resource sites.

Paleontological Resources

The impacts on paleontological resources under the Wetlands-Avoidance Alternative would be similar to those under the proposed project. Under the Wetlands-Avoidance Alternative, the construction footprint would decrease by 31.2 acres to avoid all wetlands and provide enhanced protection to the historic resources. As with the proposed project, this construction could occur in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium, and, therefore, could result in impacts on paleontological resources. In particular, construction of bridges would occur in drainages where Quaternary alluvium is likely to occur. Because the extent of construction is slightly less but construction in Quaternary alluvium is likely

more under the Wetlands-Avoidance Alternative than under the proposed project, the impact would be of a similar magnitude.

Greenhouse Gas Emissions

GHG impacts under the Wetlands-Avoidance Alternative would be comparable to those under the proposed project. Compliance with LRVSP Sustainability Element policies would reduce construction and operational GHG emissions consistent with the relative reductions estimated for the proposed project.

Like the proposed project, development under the Wetlands-Avoidance Alternative would generate new vehicle trips and consume fossil fuels, which could conflict with the state's decarbonization and carbon neutrality goal. The requirements listed in Mitigation Measures GHG-1, GHG-2, AQ-2b, and AQ-2c, as proposed for the project in Section 3.6, *Greenhouse Gas Emissions*, or similarly effective measures would still be needed under the Wetlands-Avoidance Alternative. However, even with mitigation, the Wetlands-Avoidance Alternative's cumulative contribution of GHG emissions would be significant and unavoidable, and the alternative could conflict with the 2017 Scoping Plan and the state's long-time climate change goals in AB 1279 and the 2022 Scoping Plan.

Hazards and Hazardous Materials

The impacts related to hazards and hazardous materials under the Wetlands-Avoidance Alternative would be similar to those under the proposed project. This alternative would allow the development of 800 residential units as in the proposed project, but with slightly higher density, as well as the construction of 14 bridges. While 31.2 fewer acres would be developed under this alternative than under the proposed project, the 14 bridges would add more construction activity than would occur under the proposed project. Construction operators would be required to follow all best management practices, as described in Impact HAZ-1 of Chapter 3, Section 3.7, *Hazards and Hazardous Materials*, which would reduce impacts to a less-than-significant level. Operation-related impacts and residential impacts, such as generation of household hazardous waste, would be the same as the proposed project because the same number of residential units would result. As compared with the proposed project, impacts related to significant hazards to the public or environment would be similar under this alternative.

El Dorado County has not identified specific roads as emergency evacuation routes but encourages residents to learn their local roads in preparation for an emergency (Cathey pers. comm.); therefore, like the proposed project, this alternative would not be expected to result in significant impacts on emergency response or evacuation plans.

Although development under this alternative would introduce new fire hazards or risk for people and structures in the project area, existing county policies related to fire hazards and fire minimization would be enforced, and subdivision plans would need to be approved by the El Dorado Hills Fire Department. Because the amount of development would be the same, the risk of fire to people and structures would be the same under the Wetland-Avoidance Alternative as under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the Wetlands-Avoidance Alterative would be similar in nature to those of the proposed project but of a slightly lesser

magnitude. Under this alternative, development would be restricted to areas outside the wetland setback areas, resulting in the availability of approximately 7.5 fewer acres. In addition, the Wetlands-Avoidance Alternative would incorporate the preservation of the historic resources associated with the old limestone mine into the project, with approximately 31.2 fewer acres of development area available. By avoiding all wetlands, impacts on hydrology, water quality, and water resources, including the discharge of dredged or fill material into waters of the United States (which could affect beneficial uses of the wetlands, such as riparian and wildlife habitat), would be minimized under this alternative. Adverse effects on water quality associated with the construction of 14 bridges would be mitigated via the compliance measures described below.

Similar to the proposed project, impacts related to hydrology, water quality, and water resources would be minimized and would be less than significant through compliance with the latest NPDES permit and other water quality requirements (i.e., Construction General Permit, Small MS4 Permit, WDRs for dewatering, other federal and state regulations, County plan standards, and County and other local ordinances). In addition, Mitigation Measures BIO-1a through BIO-1c, BIO-3a, and BIO-3b, as recommended for the proposed project, would be required to reduce potential water quality impacts where wetlands or other waters may be affected by construction.

Regarding post-development impacts, proper measures to maintain water quality after construction would be required as under the proposed project. Source and treatment control measures contained in the State Water Board MS4 Permit Order No. 2013-0001-DWQ, the County SWMP (El Dorado County 2004) and the County Drainage Manual (El Dorado County 2020), and/or EPA guidance and other related guidance documents would be implemented. General site housekeeping and design control measures incorporated into the project design can include conserving natural areas, protecting slopes and channels, and minimizing impervious areas. Treatment control measures may include use of vegetated swales and buffers, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other LID technology measures. These measures can also help comply with the Central Valley Water Board Basin Plan, which specifies water quality objectives and beneficial use requirements.

Due to the restriction in the amount of acreage allotted for development under Alternative 4 as compared with the proposed project, the impact would be of a slightly lesser magnitude. The overall development footprint associated with Alternative 4 would be slightly less, as would be the construction-related impacts associated with Alternative 4.

Land Use Planning and Agricultural Resources

Development under the Wetlands-Avoidance Alternative, like the proposed project, would result in the conversion of currently undeveloped land that is designated for rural residential uses to low-density residential uses. Like the proposed project, the Wetlands-Avoidance Alternative would likely require amendments to the County General Plan land use designations to increase the density of the project site in specified areas.

Implementation of the Wetlands-Avoidance Alternative has a very similar footprint, and like the proposed project, would result in a less than significant impact related to inconsistency with agricultural zoning, as most of the project site is zoned Rural Lands which, is intended primarily for residential uses. As with the proposed project, the Wetlands-Avoidance Alternative would not physically divide an existing community. The Wetlands-Avoidance Alternative would not result in

any other significant impacts related to agriculture or land use. Therefore, impacts under the Wetlands-Avoidance Alternative would be the same as those under the proposed project.

Noise and Vibration

The Wetlands-Avoidance Alternative would result in comparable noise impacts as the proposed project, as both would result in the development of 800 lots. It is likely that construction and operational activity would be very similar in duration and intensity relative to the proposed project. Construction and operational noise under this alternative would be dispersed similarly in the project area as it would for the proposed project. Avoiding wetlands in the project area does not substantially change the layout of land uses under this alternative; hence, there would be a similar amount and distribution of construction equipment generating short-term noise. Mitigation Measure NOI-1a, as discussed in Chapter 3, Section 3.10, *Noise*, would be implemented to reduce construction impacts on existing residences to a less-than-significant level. Impacts would be the same as the proposed project.

There would also be the same amount and distribution of residents and associated vehicle traffic generating operational noise under the Wetlands-Avoidance Alternative. Thus, the increase in traffic and operational noise generated by the Wetlands-Avoidance Alternative would also be significant and unavoidable even with implementation of Mitigation Measure NOI-1b, which would require appropriate noise-control features to reduce the impact; however, impacts would be the same as the proposed project.

Traffic noise impacts on the residence at 2080 Marble Valley Road would be the same as the proposed project. Because of the proximity of the residence to the roadway, the traffic noise increase at this residence would be substantial. Impacts under the Wetlands-Avoidance Alternative would be significant and unavoidable, the same as under the proposed project.

Development under the Wetlands-Avoidance Alternative could require the use of pile-driving equipment to construct bridges over wetland areas. Pile-driving activity would be temporary, occurring only during construction, but could disturb the residences that are near the bridge construction sites. In addition, any listed species near the bridge construction sites could also be affected by pile-driving activity. Similar to the proposed project, implementation of this alternative could involve some blasting that would generate vibration. Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. However, vibration impacts would be more severe than under the proposed project because of potential pile-driving activity required to construct bridges.

Because the project site would be the same for the Wetlands-Avoidance Alternative as it would be for the proposed project, development under this alternative would not be located within noise contours of any public or private airports and would not change airport operations such that there would be changes in airport- noise contours that would expose people to substantial noise.

Population and Housing

The Wetlands-Avoidance Alternative would allow for the development of 800 residential units and could increase the County's population by 2,336 residents, the same number of residential units and increase in population as associated with the proposed project. This alternative would have the same significant and unavoidable impact on population growth as the proposed project.

The project area currently contains 6 housing units. Therefore, as with the proposed project, development under this alternative has the potential to displace these existing housing units. Like the proposed project, this alternative would provide housing units in excess of those displaced and would not necessitate the construction of replacement housing elsewhere. Impacts would be the same as those of the proposed project.

Public Services and Utilities

Impacts on public services and utilities under the Wetlands-Avoidance Alternative would be similar to those of the proposed project. Like the proposed project, this alternative would allow the development of 800 residential units, albeit with a higher density. The identical number of residential units would create the same impacts on police and fire protection services as the proposed project. Because it would have the same number of single-family dwelling units, the Wetlands-Avoidance Alternative would result in the same amount of school-age children as under the proposed project. The El Dorado Union High School District and the Buckeye Union School District collect taxes via the El Dorado Schools Financing Authority Community Facilities District that provides funds for capital facilities to serve students generated from the new development (SchoolWorks, Inc. 2018). Increased school enrollment would not cause significant environmental effects; rather, it would cause only social effects. Similarly, impacts on libraries are of a social nature and would not have environmental effects.

Because of the same amount of residential units, the Wetlands-Avoidance Alternative would also result in the same demand on wastewater as the proposed project, 0.19 mgd that would be conveyed to the Deer Creek WWTP for treatment. The WWTP is permitted for 3.6 mgd average dry weather flow and currently treats an average of 2.64 mgd. Given the current range of wastewater generation in the Deer Creek WWTP service area of 2.64, an additional 0.19 mgd would not exceed the permitted design flow of 3.6 mgd.

The Wetlands-Avoidance Alternative would result in the same demand on potable water, recycled water, solid waste services, electricity, natural gas, and other energy demands. As described in Chapter 3, Section 3.12, *Public Services and Utilities*, Impact PSU-8, the same energy- and resource-conserving effects would occur under this alternative. Because the overall development footprint associated with the Wetlands-Avoidance Alternative would be similar to the proposed project, construction and operation of this alternative would cause similar demand for public services, utilities, and energy.

Recreation

Development under the Wetlands-Avoidance Alternative would include constructing up to 800 single-family housing units, increasing the population in an area currently deemed deficient in recreational resources. Using the County's park-planning household size of 3.3 people per single-family residential unit, this alternative would be expected to introduce approximately 2,640 people, the same number of new park users anticipated under the proposed project. Like the proposed project, this alternative would provide 8 acres of new public parkland. Effects of this alternative, as proposed, on the deterioration of existing neighborhood parks would, therefore, be expected to be the same as those associated with the proposed project. Implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Chapter 3, Section 3.13, *Recreation*, requiring parkland dedication or payment of in-lieu fees to the El Dorado Hills CSD would mitigate this impact of the Wetlands-Avoidance Alternative to less than significant.

This alternative would result in the construction of 8 acres of developed park facilities. Therefore, adverse physical effects on the environment associated with construction or expansion of recreational facilities under this alternative would be significant and the same as the proposed project. However, development under this alternative for offsite parkland would require parkland dedication or payment of in-lieu fees to the CSD, which would mitigate any impact. Implementation of a mitigation measure similar to Mitigation Measure REC-1, described in Chapter 3, Section 3.13, *Recreation*, requiring parkland dedication or payment of in-lieu fees to the El Dorado CSD, would mitigate this impact of the Wetlands-Avoidance Alternative to less than significant. Because the location of any such offsite recreational facilities has not been determined, and no plan identifies actual facilities or locations for future projects, precise environmental impacts associated with them would be speculative to address at this time. Project-specific environmental review would be required to identify the actual impacts of new park facilities, depending on the precise type and location of those facilities.

Transportation and Circulation

The Wetlands-Avoidance Alternative would provide for development consistent with the proposed LRVSP, so up to 800 single-family dwelling units could be constructed at the project site (Table 4-6).

Table 4-6. Trip Generation under the Wetlands-Avoidance Alternative and the Proposed Project

		Trips		
Land Use	Quantity	Daily	A.M.	P.M.
Wetlands-Avoidance Alternative	800	7,616	600	801
Proposed Project	800	7,616	600	801
Difference (Wetlands-Avoidance Alternative – Proposed Project)	0	0	0	0

As summarized in Table 4-6, the Wetlands-Avoidance Alternative provides for the development of 800 single-family units on the project site, the same number of units as the proposed project. The Wetlands-Avoidance Alternative would result in similar VMT efficiency compared to the proposed project. As with the proposed project, the Wetlands-Avoidance Alternative is anticipated to result in a significant and unavoidable impact even with implementation of similar mitigation.

Consideration of Screening Criteria

Ability to Meet Project Objectives

The County's primary objective for the proposed project is to create development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community. The Wetlands-Avoidance Alternative would make efficient and feasible use of existing infrastructure, and would promote a sense of community to the same extent as the proposed project. Because it is the same footprint and the same number of dwelling units, in a very similar configuration, the Wetlands-Avoidance Alternative would meet objectives to the same extent as the proposed project.

Impact Avoidance

The Wetlands-Avoidance Alternative would result in development of the same number of dwelling units and would, therefore, result in the same impacts related to population growth, such as air quality, greenhouse gas emissions, noise, traffic, and services/utility demand. Impacts on geology, hydrology, and paleontology would be the same because the same amount of construction would take place. Impacts on some biological resources (riparian, oak woodland, and annual grassland habitats and the species that occupy these habitats) would be the same because the same amount of construction would take place on the same acreage. However, impacts on wetlands and the plant and animal species that occupy wetlands would be reduced. Direct impacts on cultural resources would be the same as the proposed project, and like the proposed project, this alternative would incorporate the preservation of the historic resources associated with the old limestone mine into the project, which would reduce indirect impacts.

Feasibility

Implementation of the Wetland-Avoidance Alternative would be possible as described because County requirements for construction and oak preservation would be satisfied and because this alternative occupies the same footprint as the proposed project. This alternative would result in the same number of residential units, making it financially feasible. However, this alternative would also require the construction of 14 bridges, which may not be economically feasible for the project applicant.

4.4 Environmentally Superior Alternative

CEQA requires an EIR to examine a range of feasible alternatives to a proposed project. State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which of those alternatives is the environmentally superior alternative. The environmentally superior alternative is typically considered to be the alternative found to have the least environmental impact. If, in the course of identifying the environmentally superior alternative, the No-Project Alternative is found to be the environmentally superior alternative, then State CEQA Guidelines Section 15126.6(e)(2) further requires that an EIR identify which among the other alternatives is the environmentally superior alternative. Consequently, although the No-Project Alternative is evaluated and presented for comparison purposes, determination of the environmentally superior alternative in this chapter primarily reflects the differences in impacts among the remaining alternatives. Determination of the environmentally superior alternative uses the impact evaluations of the proposed project and of each alternative in a comparative process. The impacts of each alternative are identified and compared with those of the proposed project. The type and relative magnitude of each alternative's impacts are evaluated, and the alternative found to have the least impact, as compared with the others, is determined to be the environmentally superior alternative.

Table 4-7 provides a comparison of the level of impacts under the alternatives considered in this EIR as compared with the proposed project. In many instances, the potential effects would be similar, meaning that the overall outcome of implementing the proposed project compared with any one of the alternatives would generally result in the same type and magnitude of effects on a specific resource, even though the alternative approach differs in some way from the proposed project.

As shown in Table 4-7, the No-Project Alternative was determined to be environmentally superior. The No-Project Alternative would result in fewer impacts on most resource areas and reduce the significance of land use planning and population impacts because no amendments to the County General Plan. No rezoning would be required, and the population increase would be much less than under the proposed project or other alternatives. Without a plan to develop pedestrian and bicycle trails, the No-Project Alternative would result in greater impacts on those resources.

However, as noted, when the No-Project Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which among the other alternatives is the environmentally superior alternative. The environmentally superior alternative is the 50%-Reduced-Density Alternative. This alternative would result in half the dwelling units, which corresponds to fewer residents and, therefore, less impact on population-related resource areas such as air quality, and public services. The overall footprint would be the same as under the proposed project, but, because there would be fewer residences, construction-related impacts would likely be less.

Table 4-7. Comparison of Alternative Impacts to the Proposed Project

Resource Topic	Proposed Project	Alternative 1 – No Project		Alternative 2 – Reduced Density (0.2 du/ac)		Alternative 3 – 50% Reduced Density		Alternative 4 – Wetland Avoidance	
Aesthetics									
Light/Glare	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Construction	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Operation	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Air Quality									
Conflict with Plan	SU	SU	(=)	SU	(=)	SU	(=)	SU	(=)
Construction Emissions	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Operation Emissions	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Combined Emissions	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Construction Health	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Operation Health	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
NOA	LTS w/mit	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(=)
Odors	LTS	LTS	(=)	LTS	(=)	LTS	(=)	LTS	(=)
Biological Resources									
Oak Canopy	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Sensitive Vegetation Communities	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Wetlands	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)
Special Status Species	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Cultural Resources									
Known Archaeological Resources	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(>)	LTS w/mit	(=)	LTS w/mit	(=)
Potential Disturbance of Unknown Archaeological Resources	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)

Resource Topic	Proposed Project	Alternative 1 – No Project		Alternative 2 – Reduced Density (0.2 du/ac)		Alternative 3 – 50% Reduced Density		Alternative 4 – Wetland Avoidance	
Geology, Soils, Minerals, and Paleontological Resources									
Geology	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Mine Hazards	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(=)	LTS w/mit	(<)	LTS w/mit	(=)
Minerals	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Paleontological Resources	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Greenhouse Gas Emissions									
Generate GHG Emissions	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Conflict with Plan	SU	SU	(=)	SU	(=)	SU	(=)	SU	(=)
Hazards and Hazardous Materials									
Construction	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Operation	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Hydrology, Water Quality, and Water Resources									
Construction Site Stormwater Runoff	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(<)
Urban Stormwater Runoff	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(<)
Drainage and Flood Hazard	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(<)
Water Quality (Wetlands and Other Waters)	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)
Land Use Planning and Agricultural Resources									
Divide Community	NI	NI	(=)	NI	(=)	NI	(=)	NI	(=)
Conflict with Land Use Plan	LTS	NI	(<)	LTS	(=)	LTS	(=)	LTS	(=)
Conflict with Agricultural Zoning	NI	NI	(=)	NI	(=)	NI	(=)	NI	(=)
Noise and Vibration									
Construction	SU	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	SU	(=)
Ground Vibration	LTS w/mit	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(>)
Traffic	SU	SU	(<)	SU	(<)	SU	(<)	SU	(=)
Non-Transportation Operation	LTS w/mit	LTS w/mit	(=)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Population and Housing									
Growth	SU	LTS	(<)	LTS	(<)	SU	(<)	SU	(=)
Displacement	LTS	LTS	(=)	LTS	(=)	LTS	(=)	LTS	(=)
Public Services and Utilities									
Public Services Facilities	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Wastewater Treatment	LTS w/mit	LTS	(<)	LTS	(<)	LTS	(<)	LTS w/mit	(=)
Water Supply	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Other Utilities Demand	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Offsite Infrastructure Construction	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(=)
Energy	LTS	LTS	(<)	LTS	(<)	LTS	(<)	LTS	(=)
Recreation									
Impacts on Existing Parks	LTS w/mit	LTS w/mit	(<)	LTS w/mit	(<)	LTS w/mit	(>)	LTS w/mit	(=)

Resource Topic	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Density (0.2 du/ac)	Alternative 3 – 50% Reduced Density	Alternative 4 – Wetland Avoidance
Impacts from New Offsite Parks	LTS w/mit	LTS w/mit (<)	LTS w/mit (<)	LTS w/mit (>)	LTS w/mit (=)
Transportation and Circulation					
Emergency Access	LTS w/mit	LTS w/mit (=)	LTS w/mit (=)	LTS w/mit (=)	LTS w/mit (=)
VMT Efficiency	SU	SU (>)	SU (>)	SU (>)	SU (=)
Pedestrian/bicycle/public transit	LTS w/mit	LTS w/mit (>)	LTS w/mit (<)	LTS w/mit (<)	LTS w/mit (=)

Note: shading indicates change in significance level from proposed project.
NI = no impact.
(<) less than proposed project.
LTS = less than significant impact.
(=) equal to proposed project.
LTS w/mit = less than significant impact with mitigation incorporated.
(>) greater than proposed project.
SU = significant and unavoidable impact.

4.5 Alternatives Considered but Dismissed from Further Evaluation in this Draft EIR

The following potential alternatives were considered using the process described in Section 4.2.1, *Methods and Screening Criteria*, but were dismissed from evaluation for the individual reasons stated for each potential alternative.

4.5.1 Alternate Location Alternative

The Alternative-Location Alternative would use the same land use and density balance but in a different location. Project objectives for this alternative revolve around providing a walkable community and maximizing available infrastructure, thereby creating an economically viable plan. This alternative would require a large contiguous parcel in proximity to US 50 and existing utilities infrastructure (e.g., wastewater, water, electricity) to accommodate the residential development, as well as the recreational amenities and open space. Other parcels or areas in the vicinity of El Dorado Hills and Cameron Park are either already developed or planned for development. Large, undeveloped parcels west of the Sacramento–El Dorado County line are outside the County and lack the landscape provided at the current proposed location. Additionally, G3 Enterprises does not own other parcels in the area. For these reasons, there is no alternative site available for development of the proposed project that would result in a substantial reduction of environmental impacts while meeting the project objectives. Therefore, this alternative was removed from consideration.

4.5.2 Original 2012 Site Layout Alternative

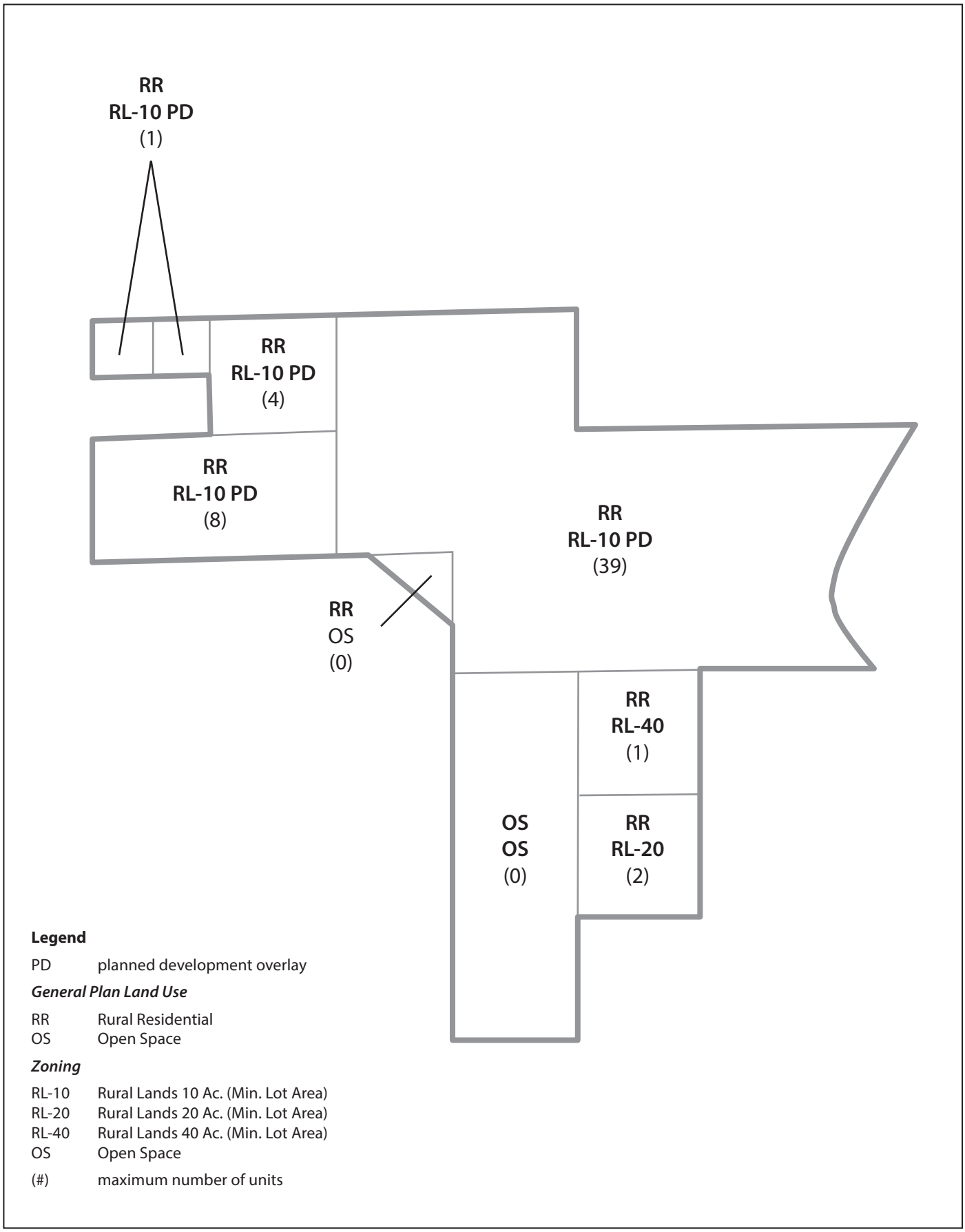
The Original-2012-Site-Layout Alternative would develop 800 residential lots in the same project area. Perimeter lots were 1-acre lots, and the alternative included 314 acres of open space and a central park. This alternative was eliminated from consideration when potential subsidence and

collapse issues related to the existing (former) underground mine were identified. This area has been designated as open space in the proposed project, and the project has been modified to address this issue and other comments received on the Notice of Preparation.

4.5.3 Buffered Alternative

The Buffered Alternative would consist of 5-acre lots surrounded by a 500-foot buffer between the proposed project and Cameron Estates on the north and Royal Equestrian estates on the east. This alternative was developed in response to comments received on the Notice of Preparation and was intended to address perceived issues of compatibility with surrounding land uses. A 500-foot buffer would constitute approximately 200 acres that would not be developed. Some portions of the project area that are currently proposed for open space are designated as such for safety reasons associated with potential subsidence and collapse of the underground mine. Where the safety risk could not be mitigated, such as within the mine-setback area (approximately 50 acres), these areas would remain in open space. Some areas were proposed for open space because of steep slopes; however, hills could be leveled. This alternative would not include a park.

Accounting for roads, approximately 450 acres of developable land would remain, allowing for a total of 90 5-acre lots. While this alternative would reduce impacts related to traffic and air quality and would leave a considerable amount of acreage in open space, the random nature of the selection of open space would not translate to fewer impacts on on-the-ground resources, such as wetlands, oak woodlands, special status-species, wildlife movement corridors, or cultural resources. It is also possible that visual impacts would be increased because of the potential for substantial changes to site terrain. This alternative was eliminated from consideration because, with the low number of dwelling units, and the additional construction necessary to make steep areas suitable for development, it would not be economically feasible and because it would result in increased environmental impacts, particularly to biological and cultural resources.



Legend

PD planned development overlay

General Plan Land Use

RR Rural Residential
OS Open Space

Zoning

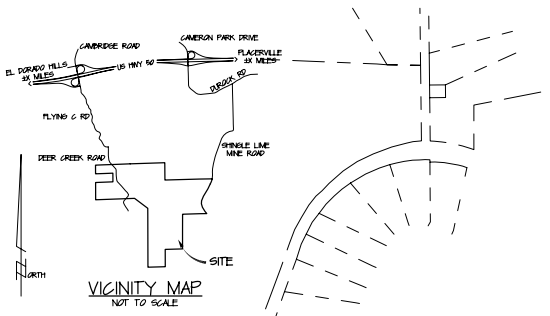
RL-10 Rural Lands 10 Ac. (Min. Lot Area)
RL-20 Rural Lands 20 Ac. (Min. Lot Area)
RL-40 Rural Lands 40 Ac. (Min. Lot Area)
OS Open Space
(#) maximum number of units

Graphics ... 00666.12 (12-20-2016)

Figure 4-1
Alternative 1
No Project Alternative

GENERAL NOTES

1. THE FIELD SURVEY PERFORMED TO PREPARE THIS TENTATIVE PARCEL MAP AND RELATED EXHIBITS WAS FOR ESTABLISHING AERIAL CONTROL ONLY. ON-SITE AND OFF-SITE IMPROVEMENTS ARE LOCATED AN



VICINITY MAP
NOT TO SCALE

OWNER OF RECORD:
GS ENTERPRISES
502 E. WHITMORE AVENUE
MODESTO, CA 95358
CONTACT: AMY WOLFE
TEL: 209-541-7006

NAME OF APPLICANT:
GENE E. THORNE & ASSOCIATES, INC.
4080 PLAZA GOLDORADO CIRCLE
CAMERON PARK, CA 95682
TEL: 530-677-1747 FAX: 530-677-4205
EMAIL: planning@thornecivil.com

MAP PREPARED BY:
GENE E. THORNE & ASSOCIATES, INC.
4080 PLAZA GOLDORADO CIRCLE
CAMERON PARK, CA 95682
TEL: 530-677-1747 FAX: 530-676-4205
EMAIL: planning@thornecivil.com

SCALE OF MAP:
1" = 400'

CONTOUR INTERVAL:
TWO (2) FEET

SOURCE OF TOPOGRAPHY:
AERIAL SURVEY

SECTION, TOWNSHIP & RANGE:
A PORTION OF SECTIONS 14, 15, 16, & 22, T. 9 N., R. 9E., M.D.M.

ASSESSOR'S PARCEL NOs:

109-010-09 (PM 12-114-A)	109-010-10 (PM 12-114-B)
109-010-13 (PRS 4-101)	109-010-14 (PRS 4-101)
109-010-01	109-010-04
109-010-05	109-010-06 (RS 15-84-1)
109-010-20	

PRESENT ZONING:

109-010-09 - RE-10	109-010-10 - RE-10
109-010-13 - RE-10	109-010-14 - RE-10
109-010-01 - RE-10	109-010-04 - OS
109-010-05 - RA-40	109-010-06 - RA-20
109-010-20 - OS	

TOTAL PARCEL AREA:
795.8± ACRES

MINIMUM PARCEL AREA:
— ACRES

TOTAL NUMBER OF PARCELS:
—

WATER SUPPLY:
INDIVIDUAL WELLS

SEWAGE DISPOSAL:
ON SITE SEWAGE DISPOSAL

PROPOSED STRUCTURAL FIRE PROTECTION:
EL DORADO COUNTY FIRE PROTECTION DISTRICT

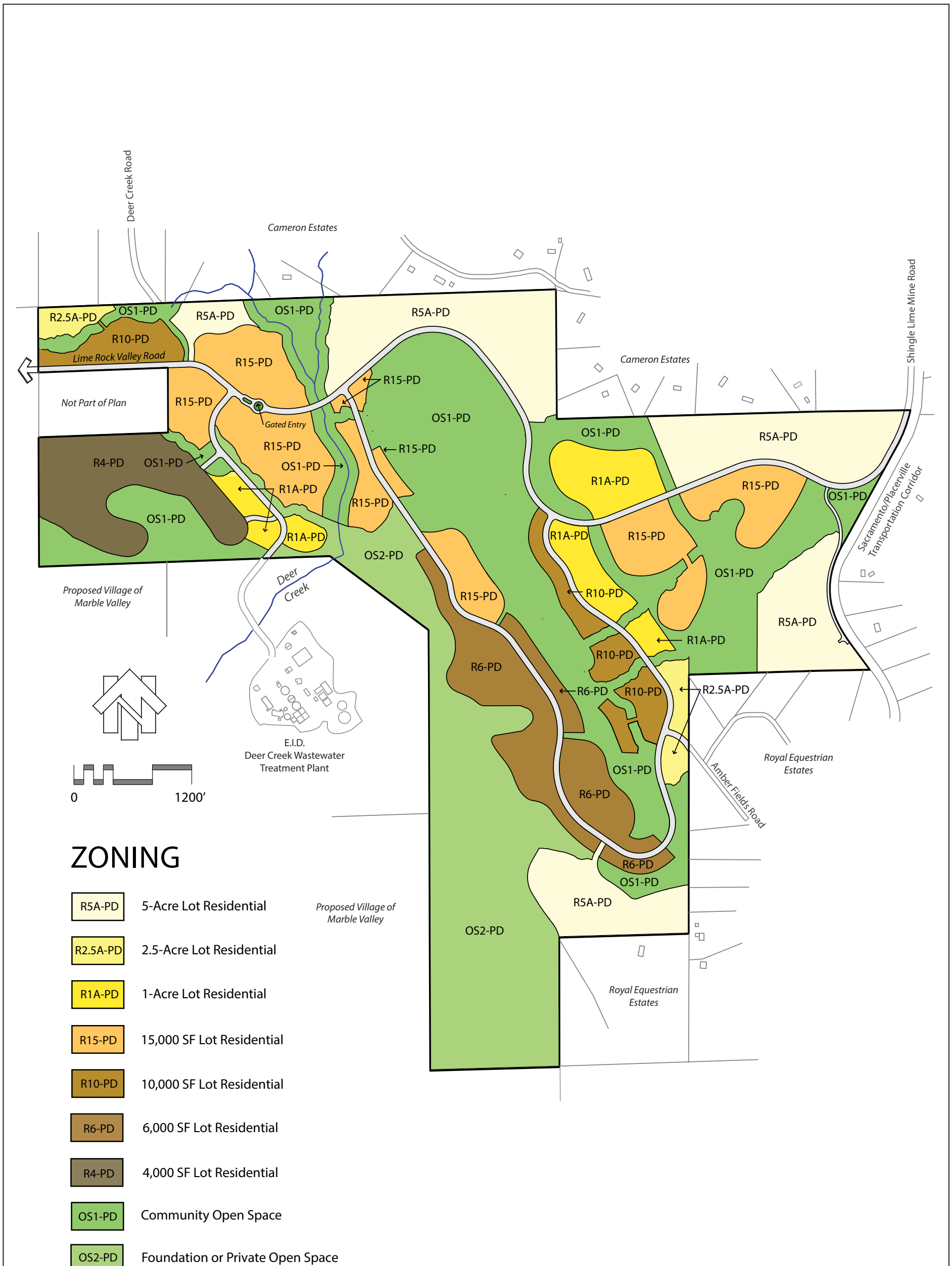
DATE:
NOVEMBER 09, 2010
PLANNING COMMISSION: _____
APPROVAL/DENIAL DATE: _____

BOARD OF SUPERVISORS: _____
APPROVAL/DENIAL DATE: _____

Graphics ... 00666.12 (7-25-2016)

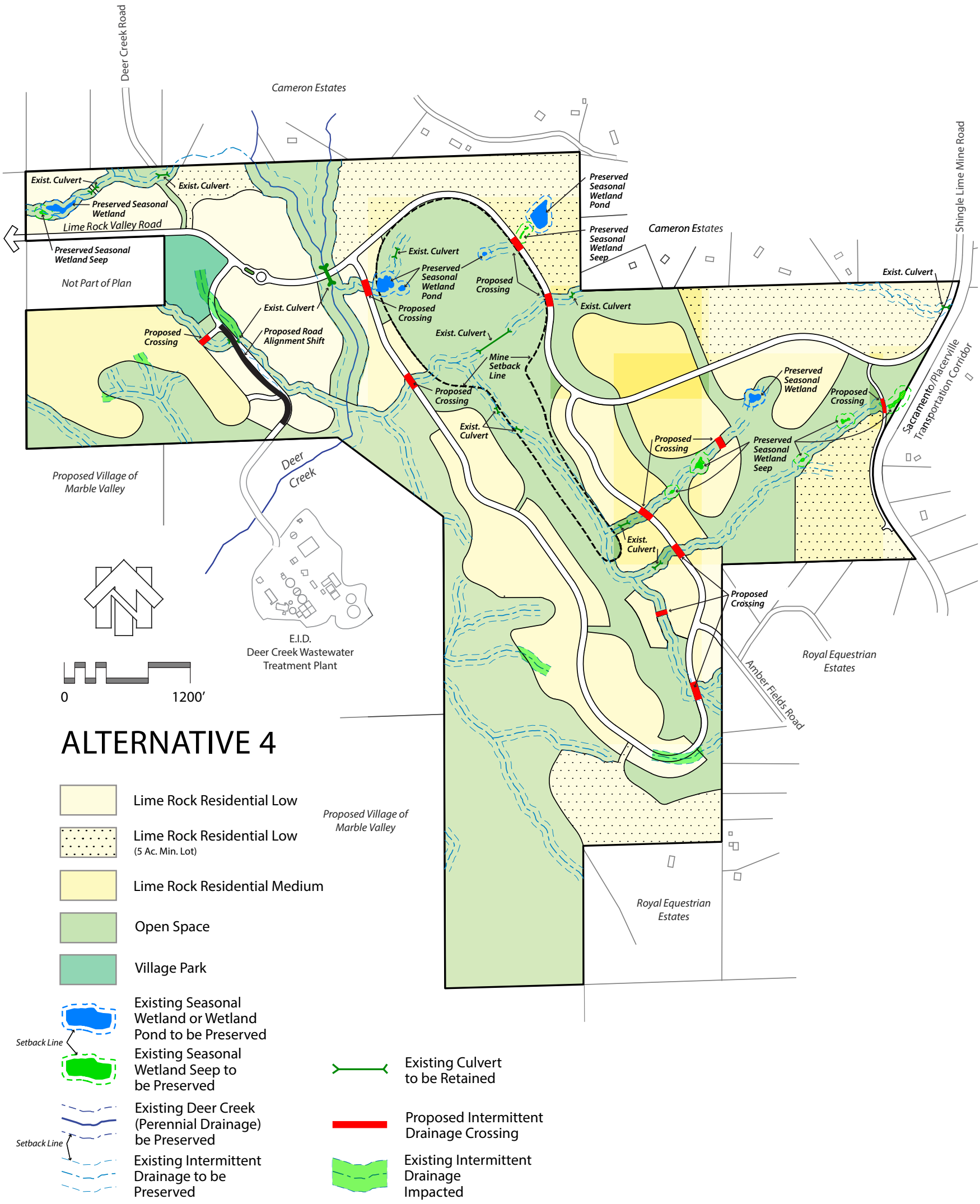
ICF

Figure 4-2
Alternative 2
Reduced Density (0.2 Lots/Acre)



Graphics 00666.12 (6/28/21) AB

Figure 4-3
Alternative 3
50 Percent Reduced Density



Graphics ... 00666.12 (7-25-2016)

Figure 4-4
Alternative 4
Wetlands Avoidance and Historic Resources Protection

This page intentionally left blank