Chapter 4
Alternatives Analysis

4.1 Alternatives Overview

The California Environmental Quality 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 an EIR briefly discuss the reasons the alternative was dismissed. In addition to a range of alternatives, an EIR must discuss the "No-Project Alternative," which describes the reasonably foreseeable probable future conditions if the project is not approved (State CEQA Guidelines 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 21002).

This chapter describes the alternatives to implementation of the Village of Marble Valley Specific Plan (VMVSP; 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, *Aesthetics*, through 3.14, *Transportation and Circulation*.

4.2 Alternatives Development

4.2.1 Methods and Screening Criteria

The alternative screening criteria are listed here and are described below in detail.

- **Ability to meet to project objectives—**The extent to which the alternative fulfills the project's objectives.
- **Impact avoidance—**The extent to which the alternative substantially avoids, minimizes, reduces or eliminates an impact.
- **Feasibility—**The extent to which the 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 would reduce one or more project impacts, and that appear feasible are discussed in greater detail in Section 4.3, *Alternatives Analysis*. Those alternatives that were considered but removed from further consideration are described under Section 4.5, *Alternatives Considered but Dismissed from Further Analysis in this Draft EIR.*

Adherence to Project Objectives

El Dorado County's (County's) primary 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 as envisioned by the *El Dorado County General Plan* (County General Plan) (El Dorado County 2004a). There are an additional 15 objectives as follows.

- Fulfill regional land use objectives by achieving Metropolitan Transportation Plan/ Sustainable Communities Strategy (MTP/SCS) Consistency. Establish new development that fulfills regional land use objectives by directing two-thirds of new growth in "…Centers and Corridors and Established Communities (i.e., existing suburbs, downtowns, commercial corridors, and the buildout of today's existing suburbs). The remaining third of new housing and 15% of job growth is expected to be in more than two-dozen new Developing Communities (i.e., greenfield areas), mostly located at the edge of established communities and in scattered rural residential areas." Thus achieving the intent of SACOG's adopted 2020 MTP/SCS.
- ***Curtail suburban sprawl.*** Curtail suburban sprawl (County General Plan Goal 2.1) by promoting mixed-use development patterns to accommodate the County's future population growth and support economic expansion.
- ***Assist in meeting future Regional Housing Needs Allocations (RHNA) needs.*** Assist in meeting the County's RHNA for the 2021–2029 Housing Element (and beyond) by introducing new lands zoned multifamily.
- ***Broaden the housing stock in El Dorado Hills and Cameron Park communities.*** Maximize opportunities for higher-density housing. 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), including the senior population (County General Plan Goal HO-4).
- ***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).
- ***Improve connectivity of the regional roadway network.*** Expand the regional roadway network by connecting Marble Valley Parkway between Bass Lake Road and Cambridge Road

interchanges, thus improving parallel capacity to U.S. Highway (US) 50 and providing a coordinated roadway system (County General Plan Goal TC-1).

- ***Encourage future transit opportunities.*** Locate higher-density development in proximity to new public roadways to improve the feasibility of future transit services, thus reducing traffic congestion and offering alternative transportation choices to a range of users (County General Plan Goal TC-2).
- ***Create a new non-motorized transportation system.*** Create a new non-motorized transportation system (County General Plan Goal TC-4) linking residential development to retail services and employment centers**.** 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 (VMT).
- ***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 possible linkage to the El Dorado Trail (County General Plan Goal 9.1).
- ***Create new recreational opportunities.*** Provide recreational facilities for the health and welfare of residents and visitors (County General Plan Goal 9.1), including a passive regional park for public enjoyment, thus promoting opportunities to capitalize on recreational uses through tourism and recreation-based businesses and industries (County General Plan Goal 9.3).
- ***Minimize impacts on oak woodlands.*** Conserve vegetative resources (County General Plan Goal 7.4) and minimize impacts on oak woodlands by preserving the area around Deer Creek as open space and 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 of the Cowell family's former quarry and kiln operations.
- ***Foster sustainable communities.*** Foster sustainable communities (County General Plan Goal 2.1) by utilizing sustainable design practices to reduce greenhouse gas (GHG) emissions, and increase the efficiency of energy and water use in new development (County General Plan Goal HO-5).
- ***Promote the El Dorado County agri-tourism industry.*** Promote El Dorado County's Wine Industry by establishing a unique and special project theme focusing on public and private vineyard landscapes, including agricultural production (General Plan Goal 8.2) and creating an "agriburbia" destination**.**

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. The following significant and

unavoidable impacts and less-than-significant impacts that can be reduced to less-than-significant levels with mitigation would result from the proposed project. These impacts are analyzed in detail in Chapter 3, *Impact Analysis*.

Significant and Unavoidable Impacts

Aesthetics

- Impact AES-1: Temporary visual impacts caused by construction activities
- Impact AES-2: Have a substantial adverse effect on a scenic vista
- Impact AES-3: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a scenic highway
- Impact AES-4: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality
- 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-2b: Result in a cumulatively considerable net increase of any criteria pollutant during operation 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-3a: Expose sensitive receptors to substantial toxic air contaminant concentrations and health risks from equipment and vehicle exhaust
- Impact AQ-3c: Expose sensitive receptors to substantial criteria pollutant concentrations during construction

Geology, Soils, Minerals, and Paleontological Resources

- Impact GEO-7: Be located on a subterranean mine that has a shaft, vent, or adit open to the surface

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 VMVSP project area
- 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)

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-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 wetlands, seasonal wetland swales, and seeps
- Impact BIO-4: Loss of other waters of the United States, including perennial creek, seasonal creek, intermittent drainage, ephemeral drainage, drainage ditch, quarry pond, and stock pond
- Impact BIO-5: Potential loss of Brandegee's clarkia or other special-status plants
- Impact BIO-7: Potential mortality or disturbance of California red-legged frog within the VMVSP project area
- Impact BIO-8: Potential mortality or disturbance of foothill yellow-legged frog within the VMVSP project area

- Impact BIO-9: Potential mortality or disturbance of northwestern pond turtle within VMVSP project area
- Impact BIO-10: Potential mortality or disturbance of Blainville's horned lizard within VMVSP project area
- Impact BIO-11: Potential mortality or disturbance of nesting special-status and non-special-status birds within the VMVSP project area
- Impact BIO-12: Potential injury, mortality, or disturbance of tree-roosting bats and removal of roosting habitat within the VMVSP project area
- Impact BIO-13: Potential mortality or disturbance of American badger within the VMVSP project area
- Impact BIO-14: Potential mortality or disturbance of ringtail within the VMVSP project area
- Impact BIO-15: Interfere with the movement of resident or migratory wildlife
- Impact BIO-16: Potential 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 within the offsite infrastructure improvement areas
- Impact BIO-19: Potential loss of waters of the United States within the offsite infrastructure improvement areas
- Impact BIO-21: Potential loss of waters of the United States within the Bass Lake Road/Hollow Oak Drive intersection improvement area
- Impact BIO-22: Potential impacts on special-status plant species within the offsite infrastructure improvement areas
- Impact BIO-24: Potential mortality or disturbance of listed vernal pool branchiopods and their habitat within offsite infrastructure improvement areas
- Impact BIO-25: Potential mortality or disturbance of California red-legged frog within offsite infrastructure improvement areas
- Impact BIO-26: Potential mortality or disturbance of foothill yellow-legged frog within offsite infrastructure improvement areas
- Impact BIO-27: Potential mortality or disturbance of northwestern pond turtle within offsite infrastructure improvement areas
- Impact BIO-28: Potential mortality or disturbance of Blainville's horned lizard within offsite infrastructure improvement areas
- Impact BIO-29: Potential mortality or disturbance of nesting special-status and non-special-status birds within offsite infrastructure improvement areas
- Impact BIO-30: Potential injury, mortality, or disturbance of tree-roosting bats and removal of roosting habitat within offsite infrastructure improvement areas
- Impact BIO-31: Potential mortality or disturbance of American badger within offsite infrastructure improvement areas

- Impact BIO-32: Potential mortality or disturbance of ringtail within offsite infrastructure improvement areas

Cultural Resources

- Impact CUL-1: Cause a substantial adverse change in the significance of an archaeological resource that is a historical resource as defined in 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 traffic improvements

Geology, Soils, Minerals, and Paleontological Resources

- Impact GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (1) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42; (2) strong seismic ground shaking; (3) seismic-related ground failure, including liquefaction; and (4) landslides
- 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 construction methods that could result in unstable geologic or soil conditions
- Impact GEO-10: Directly or indirectly destroy a unique paleontological resource or unique geologic feature
- Impact GEO-11: Impacts on geological, mineral, and paleontological resources resulting from offsite improvements and General Plan Policy TC-Xf traffic 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 greenhouse gas emissions resulting from implementation of 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, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires; 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 otherwise substantially degrade surface water or groundwater quality
- Impact WQ-3i: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite
- Impact WQ-3ii: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite
- Impact WQ-6: Impacts on hydrology, water quality, and water resources 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 treatment or conveyance facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects

Traffic and Circulation

- Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities
- Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)
- Impact TRA-4: Result in inadequate emergency access
- Impact TRA-5: Impacts on transportation as a result of offsite improvements

Feasibility

CEQA requires that alternatives considered in an EIR be feasible. Section 15364 of the State CEQA Guidelines 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, the County determined that three alternatives—a reduced-wetland-impact alternative, a reduced-development-footprint alternative, and a minimal oak woodland impact alternative—would fulfill the CEQA requirements of meeting most of the project objectives, being feasible, and reducing or eliminating one or more project impacts. In addition, a No-Project Alternative must be considered in an EIR. Therefore, the following alternatives are evaluated in comparison to the proposed VMVSP in this Draft EIR.

- Alternative 1—No-Project Alternative
- Alternative 2—Reduced Wetland Impact
- Alternative 3—Reduced Development Footprint
- Alternative 4—Minimal Oak Impact

Table 4-1 provides a comparison of the types and extent of development associated with the proposed project and the No-Project, Reduced-Wetland-Impact, Reduced-Development-Footprint and Minimal-Oak-Impact Alternatives. Each of the alternatives analyzed is further described in Sections 4.3.1, *Alternative 1—No-Project Alternative*, through 4.3.4, *Alternative 4—Minimal Oak Impact*.

Table 4-1. Alternatives Analyzed

Land Use	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Wetland Impact	Alternative 3 – Reduced Development Footprint	Alternative 4 – Minimal Oak Impact
Developed Acres[a]	1,057 ac (45%)	1,050 (45%)	759 ac (33%)	925 (39%)	516 (22%)
Open Space	1,284 ac (55%)	1,291 (55%)	1,573 (67%)	1,417 ac (61%)	1,825 (78%)
Oak Woodland Impacts	689.6 ac	802.69	554.95 ac	588.87 ac	204.84 ac
Oak Canopy Impacts	227.2 ac	176 ac	204.7 ac	190.5 ac	89 ac
Wetlands Impacts	4.6 ac	2 ac	0.6 ac	3.6 ac	3.7 ac
Residential Land Use (ac)	797 ac	850 ac	662 ac	770 ac	423 ac
Residential – Large Lot – VRL	318[b] du	0	267 du	343 du	0
Residential – Pad Graded – VRL	1,659 du	–	1,445 du	1,202 du	911 du
Estate Residential – 5-acre minimum (RE-5-PD)[c]	–	398 du	–	–	–
Residential – VRM	708 du	–	257 du	422 du	785 du
Residential – VRH	551 du	–	206 du	1,594 du	578 du
Total Dwelling Units	3,236 du	398 du	2,176 du	3,561 du	2,274 du

Land Use	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Wetland Impact	Alternative 3 – Reduced Development Footprint	Alternative 4 – Minimal Oak Impact
Schools (number)	2	1	1	2	1
School (ac)	35 ac	11 ac	20 ac	36 ac	22 ac
Commercial (ac)	16 ac	20 ac	6 ac	25 ac	0 ac
Retail	9 ac		6 ac	25 ac	–
Wine/Sales Facility	3 ac	–	–	–	–
Cultural Arts Center (RF-H)	–	20 ac	–	–	–
Event Center/Monolith	2 ac	–	–	–	–
Community Recreation Facility/Winery	2 ac	–	–	–	–
Bed & Breakfast	Yes	No	No	No	No
Office, Other Uses (ac)	41 ac	–	–	–	–
Office	21 ac	–	–	–	–
Civic – Office – Recreational	20 ac	–	–	–	–
Road Impacts – Outside Residential – Other (ac)	73 ac	159 ac	66 ac	39 ac	22 ac
Vineyards (ac)	45 ac	–	–	–	–
Private Parks (number)	5	0	3	4	1
Public Parks (ac)	47 ac	11 ac	15 ac	54 ac	50 ac
Foundation Park	Yes	No	No	No	No
Lake Park (Active-Passive)	Active	Passive	Passive	Passive	Passive
Amphitheater/Pier/Gazebo	Yes	No	No	No	No
Joint-Use Parks with School(s)	Yes	Yes	Yes	Yes	Yes
Historic Park (Active-Passive)	Active	Passive	Passive	Passive	Passive
View Park	Yes	No	No	No	No
Children Only Park	Yes	No	No	No	No
Public Infrastructure	6 ac	–	–	–	–
Offsite Improvements					
Marble Valley Parkway extension to US 50/ Cambridge Road I/C	X	X	X	X	X
Marble Valley Parkway extension to US 50/Bass Lake Road I/C	X	X	X	X	X
US 50/Cambridge Road I/C improvements	X	X	X	X	X
US 50/Bass Lake Road I/C improvements	X	X	X	X	X
Marble Valley Parkway between east and west	X	X	X	X	X
Lime Rock Valley Road extension to Deer Creek Road	X	X	X	X	X
Potable Water line extension along Cambridge Road	X	X	X	X	X
Potable Water line extension along Bass Lake Road	X	X	X	X	X

Land Use	Proposed Project	Alternative 1 – No Project	Alternative 2 – Reduced Wetland Impact	Alternative 3 – Reduced Development Footprint	Alternative 4 – Minimal Oak Impact
EID sewer and water lines extension	X	X	X	X	X
Dry utility extensions	X	X	X	X	X
Oak Canopy offsite improvements	X				
TC-Xf Improvements					
Improve the Bass Lake Road/US 50 interchange	X	X	X	X	X
Improve the Marble Valley Parkway/Marble Mountain Road intersection	X		X	X	X
Improve the Marble Valley Parkway/Marble Ridge Road intersection	X		X	X	X
Improve the Cambridge Road/Country Club Drive intersection	X	X	X	X	X
Improve the Cambridge Road/Knollwood Drive intersection	X	X	X	X	X
Improve the Cambridge Road/Flying C Road/Crazy Horse Road intersection	X		X	X	X
Improve the Bass Lake Road/Hollow Oak Drive intersection	X		X	X	X
Improve the Bass Lake Road/Country Club Drive intersection	X		X	X	X
Improve the Cambridge Road/Merrychase Drive/US 50 westbound ramps intersection	X	X	X	X	X
Improve the Latrobe Road/Town Center Boulevard intersection	X		X	X	X

ac = acres
du = dwelling units
I/C = interchange
EID = El Dorado Irrigation District
X = present
[a] Excludes roads and parks, which are listed separately.
[b] Includes 14 residential units in areas designated for Agriculture Tourism.
[c] Low-Density Residential.

4.3.1 Alternative 1—No-Project Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines 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 to 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 will usually proceed 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 15126.6 (e)(2)).

The County currently has an approved plan in place for the VMVSP project area, the Marble Valley Master Plan (approved in 1998), and development of the site is assumed under the current County General Plan. An EIR was prepared for the Marble Valley Master Plan and certified by the County Board of Supervisors. In 2008, a Finding of Consistency was approved by the County for some minor modifications to the originally approved subdivision map. This 2008 plan is the one illustrated in Figure 4-1. Thus, the plan-to-plan comparison is the appropriate analysis for this EIR, and a No-Project Alternative under which the project site remains in its existing state does not require evaluation in this Draft EIR.

The No-Project Alternative assumes the land use would be developed as currently approved for the 398-lot 2-acre-minimum residential lots ("Design E") with underground utilities, located on approximately 850 acres throughout the project site, as shown on Figure 4-1. More development would occur on ridgelines under the No-Project Alternative. The total development footprint of the No-Project Alternative would be 1,050 acres, including the large-lot residential uses, 11 acres for a school, 20 acres for a Cultural Arts Center, 11 acres of public parkland, and approximately 159 acres of roadways. There would be 1,291 acres of open space. Under the No-Project Alternative, historic resources would be protected within conservation easements, open space areas would be private, with no public access, and no trail system would be built to connect to proposed public trails outside the project area.

Aesthetics

Construction of the No-Project Alternative would be very similar to the proposed project and would create changes in views of and from the project site over the course of phased development. However, construction of the No-Project Alternative would require the removal of fewer oak trees, which are located throughout the site and south of Deer Creek and are an onsite visual amenity. Therefore, the impact on visual resources would be reduced under this alternative but would still be a significant and unavoidable impact, as under the proposed project. Under the No-Project Alternative, the effect on portions of US 50 with important scenic viewpoints would be similar to the proposed project because the areas proposed for development are similar: the area next to US 50 would remain undeveloped with mature oak woodlands, intermixed with grassland and riparian vegetative communities while the area south of the project area's entry road from US 50 would be developed. The approved Marble Valley Master Plan would include 71 acres of open space along US 50, and provide direction and guidelines intended to integrate development into the existing landscape to some extent, but the visual impact of the development would still be significant and unavoidable. The proposed project and No-Project Alternative would develop roughly the same amount of area with residential, commercial, and civic land uses that would include buildings visible to all viewer groups. The primary difference between the proposed project and No-Project Alternative affecting visual resources is that the No-Project Alternative has low-density residential development throughout the site, including south of Deer Creek, whereas there would be no

development south of Deer Creek under the proposed project. The proposed project's development pattern of commercial and medium- and high-density residential land uses within the interior of the site would be higher density, whereas development within the interior of the site under the No-Project Alternative would be lower density. Under the No-Project Alternative, development at the interior of the site would appear visually similar when seen from US 50, vantages north of US 50, and from vista views south of the project site. Development in the area south of Deer Creek under the No-Project Alternative would have a greater impact on scenic vistas and the existing visual character and quality of this area because development would be more extensive and include residential development that would be more easily visible from vista views from existing residences and roadways located south of the site and from adjacent viewers that border this portion of the site. Therefore, the No-Project Alternative would result in significant and unavoidable impacts on visual resources, as would the proposed project.

The No-Project Alternative would include a Cultural Arts Center, an elementary school, and some residential development near the site's northern border that would be visible to adjacent viewers, while the proposed project would include an office park, a public school, and a public park. The Cultural Arts Center would be located in the same place as an office building under the proposed project, but the Cultural Arts Center would be larger and more visible from US 50. The No-Project Alternative would also develop more hillsides and ridges than would the proposed project. However, construction of the No-Project Alternative would require the removal of fewer oak trees, which are located throughout the site and south of Deer Creek and are an onsite visual amenity. Both the proposed project and No-Project Alternative would result in new sources of nighttime light. The surrounding area is not well-lit and development would make lighting more visible. The No-Project Alternative would result in slightly less lighting because there would be less commercial development, which tends to be more intensely lit, than the proposed project. The certified EIR for the Marble Valley Master Plan included mitigation measures to reduce outdoor lighting, but the resulting impact would be significant and unavoidable.

Although mitigation measures established for the proposed project would reduce visual impacts under the No-Project Alternative, impacts on visual resources under the No-Project Alternative would be slightly increased compared with those of the proposed project because of development south of Deer Creek and on the site's east, south, and west borders that would affect hillsides and ridges.

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 398 2-acre-lot dwelling units, 11 acres for a school, 20 acres for an arts center, 11 acres for parkland, and 159 acres for roadways. As with the proposed project, 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 residents within the approved Marble Valley Master Plan area 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

As compared with the proposed project, biological resource impacts would be reduced under the No-Project Alternative for oak woodland, chaparral habitat, annual grassland, and waters of the United States. Using criteria in the Oak Resources Management Plan (ORMP) (El Dorado County 2017), oak woodland impacts under the No-Project Alternative would be approximately 802.69 acres of oak woodland, compared with 689.4 acres of oak woodland impact under the proposed project. Impacts would be slightly greater than the proposed project for riparian habitat. The No-Project Alternative would also require construction of offsite infrastructure improvements, with similar corresponding impacts on biological resources as the proposed project.

Impacts on some special-status species would generally be less substantial under the No-Project Alternative. However, because the extent of construction is more dispersed throughout the VMVSP area and development in the southern part of the project area would be substantially greater under the No-Project Alternative than under the proposed project, the large contiguous open space area would be eliminated, resulting in greater impacts on wildlife corridors.

The No-Project Alternative would apply mitigation measures similar to those for the proposed project for impacts on oak woodland, jurisdictional and non-jurisdictional waters, nesting birds and bird habitat, valley elderberry longhorn beetle, and California red-legged frog. The proposed project also includes measures for yellow-legged frog, northwestern pond turtle, Blainville's horned lizard, American badger, ringtail, and vernal pool branchiopods that are not included in the certified Marble Valley Master Plan EIR. Therefore, the No-Project Alternative would require avoidance, minimization, and mitigation measures similar to those of the proposed project to reduce these impacts to less-than-significant levels and comply with state regulations.

Cultural Resources

The No-Project Alternative would result in similar impacts on archaeological resources as the proposed project, which are less than significant with the implementation of mitigation measures. The No-Project Alternative would be designed to avoid all but four resources that were recommended eligible. Mitigation measures to recover data from those resources are provided. Indirect impacts on eligible resources from vandalism would be avoided through installation of fencing and signage in combination with education and monitoring. The proposed project would result in direct impacts on two districts and two individually eligible sites. Similar data recovery mitigation would reduce direct impacts to a less-than-significant level and fencing and/or less intrusive measures to redirect potential vandals have been proposed to address indirect impacts. The No-Project Alternative also includes development south of Deer Creek, where the proposed project would include open space. Previous studies indicate that a number of archaeological sites are located south of Deer Creek (Archeo-Tech 1989). Under the No-Project Alternative, more residential development would occur in this area, leading to more potential for indirect impacts from the presence of people. However, the No-Project Alternative would apply mitigation measures similar to those of the proposed project to protect these resources, which would result in a less-than-significant impact.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils

The No-Project Alternative would result in the development of residential land uses, open space, and roadways. The number of residential units that would be developed under the No-Project Alternative would be far fewer than that developed under the proposed project, though it would occupy approximately the same acreage. As a result, less construction activity would be required under the No-Project Alternative, which would lead to fewer overall construction impacts than under the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, mine hazards, and earthquake safety. However, the overall types of potential impacts would not be different under the No-Project Alternative than under the proposed project, and the same mitigation requiring geotechnical studies, slope stabilization, and erosion control measures that are provided for the proposed project are included in the certified Marble Valley Master Plan EIR.

Mine Hazards

Impacts related to mine hazards under the No-Project Alternative would be similar to the proposed project. The potential for people to fall into these features and be injured and/or trapped exists under the No-Project Alternative, as it does under the proposed project. As under the proposed project, mitigation measures to establish a process for closing these features and to establish and implement a reporting process for undocumented mining features would reduce the severity of this impact but not to a less-than-significant level. Therefore, as under the proposed project, this impact would be significant and unavoidable under the No-Project Alternative.

Minerals

The impacts on mineral resources under the No-Project Alternative would be similar to those under the proposed project. Construction under the No-Project Alternative would occur in areas with

similar mineral resource zones (MRZs) to the proposed project, although the overall extent of construction would 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. As with the proposed project, 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. Mitigation Measures GEO-10a, GEO-10b, and GEO-10c, as recommended for the proposed project, would be required for this alternative to address the discovery of fossils. However, because the extent of construction would be significantly less and the overall development footprint would be slightly smaller under the No-Project Alternative than under the proposed project, the impact of the No-Project Alternative would be of a lesser magnitude than the proposed project. The mitigation measures identified for the proposed project would be necessary to reduce impacts to a less-than-significant level under the No-Project Alternative.

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 VMVSP would not be adopted under the No-Project Alternative, policies outlined in the VMVSP 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. Under the No-Project Alternative, the total development footprint would be 1,050 acres—only 7 acres less than the proposed project. 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 impacts related to the potential for hazardous material releases compared with the proposed project. The No-Project Alternative would allow 11 acres for a school, 20 acres for the Cultural Arts Center, and no office park uses, whereas the proposed project would allow 35 acres for two schools, and 16 acres for retail use, and 41 acres for office park. Because there would be fewer business-related wastes or hazard risks, operation-related impacts would be slightly reduced under

the No-Project Alternative compared with the proposed project. All businesses and public facilities would be required to comply with hazardous material–related regulations and would not be expected to result in a significant hazard to the public or environment. Residential impacts, such as generation of household hazardous waste, would be reduced because there would be fewer residences. Impacts would be less than significant, as under the proposed project, but of a lesser magnitude.

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 the No-Project Alternative would not be expected to result in significant impacts on emergency response or evacuation plans. Under the No-Project Alternative and the proposed project, three points of access would be developed as emergency access routes to and from the project site. This impact would be similar in nature to the proposed project and be less than significant but because there would be less development and fewer residences, this impact would have a lesser magnitude 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 Hills Fire Department or the El Dorado County Fire Protection District and this impact would be less than significant as for the proposed project. Because there would be less development 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 in nature to those of the proposed project but of a lesser magnitude. Under the No-Project Alternative, the total development footprint would be 1,050 acres (only 7 fewer acres than under the proposed project), but far fewer residential units would be constructed, resulting in less construction. 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) and other water quality requirements (i.e., stormwater pollution prevention plan, Construction General Permit, Small Municipal Separate Storm Sewer System [MS4] Permit, waste discharge requirements [WDRs] for dewatering, other federal and state regulations, County plan standards, and County and other local ordinances) as required by mitigation measures in the EIR. Mitigation measures in the EIR for the Marble Valley Master Plan also requires that final drainage plans demonstrate that post-development drainage will be reduced to pre-development conditions.

With regard to 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's (State Water Board) MS4 Permit Order No. 2013-0001-DWQ, the County *Storm Water Management Plan* (SWMP) (El Dorado County 2004b) and the County Drainage Manual (El Dorado County 1995), 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.

Impacts related to placing structures in a 100-year floodplain and altering drainage patterns in a manner that would result in flooding would be similar under the No-Project Alternative because the acreage proposed for development is nearly the same. These impacts would be less than significant, as under the proposed project. Impacts related to flooding that could result from a dam failure would be the same as the proposed project, as the project location is the same and would be less than significant.

The overall development footprint associated with the No-Project Alternative would be only slightly smaller than the proposed project (7 acres less development). Therefore, there would be slightly fewer post-construction-related impacts associated with the No-Project Alternative than under the proposed project.

Land Use Planning and Agricultural Resources

The No-Project Alternative would involve land uses similar to those proposed under the proposed project. The No-Project Alternative would not result in any significant impacts related to land use or agriculture. While a larger portion of the project site would be developed under the No-Project Alternative, because the site is already approved for that development, no land use impacts would occur, while the proposed project would result in a less-than-significant impact.

There would be no impacts associated with conversion of agricultural land—including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance—or forest land to nonagricultural 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. Similarly, no agricultural or timberland zoning exists on the project site, and none of the site is covered by a Williamson Act contract. There would be no impact under either the proposed project or the No-Project Alternative.

Noise and Vibration

The No-Project Alternative would result in the development of residential land uses, open space, and roadways. 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. The No-Project Alternative would result in a potentially significant short-term impact from construction noise that could be reduced to a less-than-significant level with the implementation of mitigation measures identified in the certified EIR to reduce noise and limit construction hours. However, under the proposed project, there would be more construction and it would be in closer proximity to newly constructed residences. Mitigation Measure NOI-1a would restrict construction times and reduce noise levels, but the impacts would still be significant and unavoidable. Therefore, the impact under the No-Project Alternative would be less severe than under the proposed project.

The project area is located in an area where many roadways result in traffic noise that exceed the County's 60 day-night average sound level compatibility standard. Traffic noise impacts would be similar under the No-Project Alternative but to a lesser extent because there would be less development under the No-Project Alternative than under the proposed project and because of the distance to sensitive receptors under the No-Project Alternative. Exposure of increased traffic and

operational noise generated by the proposed project on new land uses would be reduced to a less-than-significant level with the implementation of mitigation measures to construct noise barriers and use noise-reducing treatments on structures. Under the No-Project Alternative noise impacts from traffic would only result at the Cultural Arts Center. The certified EIR includes mitigation to reduce the exterior-to-interior noise by at least 25 A-weighted decibels or conduct a site-specific acoustical study to more precisely determine the degree of noise reduction required. Though no specific means to achieve noise reduction are proposed, acoustical insulation or construction of a berm or sound wall could be implemented to reduce traffic noise levels.

In addition, less development under the No-Project Alternative (398 residential units) would result in less operational noise compared with the proposed project (3,236 residential units), because increases in traffic and the associated noise would be proportionately less than under the proposed project. However, there could still be a significant increase in noise in the project area on existing land uses, namely at the single residences located adjacent to the roadway at 2080 Marble Valley Road and 4118 Flying C Road. The No-Project Alternative proposed to implement enhanced acoustical insulation or construct a berm or sound wall to reduce noise levels at this residence. Thus, the impact was considered less than significant with mitigation. However, analysis for the proposed project indicates that due to the location of this residence and the access from Marble Valley Road, and the level of the noise, mitigation would not be feasible. Therefore, this impact would be significant and unavoidable under the No-Project Alternative, as under the proposed project.

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 potentially involve some blasting that would generate vibration. Under the No-Project Alternative, as under the proposed project, blasting would be considered less than significant through compliance with applicable regulations. Notification to nearby residents would also be implemented. Impacts would be the same as the proposed project. Because the No-Project Alternative and the proposed project would involve similar types of land uses (residences, open space, roadways), which would require similar types of construction activities, vibration impacts would be similar to those under the proposed project.

Because the project location would be the same as the proposed project, and the resulting construction activity would not differ from the proposed project, development under the No-Project Alternative would also not be located near any public or private airports. Additionally, as discussed in Section 3.10, *Noise and Vibration*, the site is not located within the community noise equivalent level (CNEL) 55 decibel (dB) contours of the Cameron Airpark public-use airport. Thus, impacts pertaining to aircraft overflight noise would be less than significant and would not differ from impacts of the proposed project.

Population and Housing

As with the proposed project, development under the No-Project Alternative would follow the current and anticipated trend of continuing growth in unincorporated El Dorado County. Development under the No-Project Alternative would occur as currently entitled or allowed under existing land use designations, with up to 398 low-density residential units, as opposed to 3,236 units of low, medium, and high density under the proposed project. Assuming the same average people per unit as under the proposed project (3.06 for low density), occupancy of 398 new housing units proposed under the No-Project Alternative would be expected to increase the county's

population by approximately 1,218 people. The No-Project Alternative would result in less growth than the proposed project, and the impact would be less than significant as indicated in the certified EIR.

The project area currently contains no housing units. Therefore, as with the proposed project, development under the No-Project Alternative would not displace any existing housing units or necessitate the construction of replacement housing elsewhere but would instead result in the creation of additional housing units on a currently undeveloped site. As the area contains no housing units, the No-Project Alternative, like the proposed project, would not displace any people or necessitate the construction of replacement housing elsewhere.

Public Services and Utilities

Construction of the No-Project Alternative would result in the development of 1,050 acres (7 fewer acres than the proposed project), including 398 residential units (rather than the 3,236 residential units allowed under the proposed project). Fewer dwelling units and, therefore, fewer residents are expected under this alternative, causing less demand on fire and police services. The No-Project Alternative would result in 269 school-age children rather than 2,191 as under the proposed project, resulting in less demand on schools. As described in Section 3.12, *Public Services and Utilities*, payment of school impact fees, as required by Senate Bill (SB) 50 and provided for under California Government Code Section 65995 et seq., would serve as full and complete mitigation for the demand of additional students on school facilities. 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. Therefore, overall, the No-Project Alternative would result in reduced impacts on public services, as compared with the proposed project, although both would result in less-than-significant impacts.

Because the No-Project Alternative would result in fewer residents than the proposed project, it would also result in a decreased demand on potable water, recycled water, solid waste services, dry utilities, electricity, natural gas, and other energy demands. Wastewater demands under the No-Project Alternative have already been calculated in El Dorado Irrigation District's (EID) planning, so there would be no additional impact. Impacts on utilities would be less than significant under the No-Project Alternative, as under the proposed project. Impacts from the expansion of and connection to infrastructure and offsite improvements would be similar to those under the proposed project, although to a lesser extent because some offsite improvements would not be constructed. Mitigation measures similar to those identified for the proposed project would be necessary to mitigate those impacts. Although energy- and resource-conserving measures would most likely be utilized under the No-Project Alternative, it is not assumed that measures under this alternative would match the energy-saving policies incorporated in the proposed project. Therefore, energy conservation under the No-Project Alternative would be slightly less than for the proposed project, making the impact greater, though the impact would still be less than significant. Because the overall development footprint associated with the No-Project Alternative would be slightly smaller than that of the proposed project, but with far fewer residents, 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 No-Project Alternative would include construction of up to 398 single-family housing units**.** Using the County's park-planning household sizes of 3.3 people per single-family residential unit, the No-Project Alternative would be expected to introduce approximately 1,313 park users into the area, compared with 9,168 new park users under the proposed project. Although these 1,313 new park users represent 14% of the park users anticipated under the proposed project, this alternative would still increase the demand for parks and recreation facilities. However, the No-Project Alternative would also provide 11 acres of public parkland, which would exceed the combined neighborhood and community parkland requirement of 6.6 acres for 1,313 residents. Under the No-Project Alternative, open space areas would be private, with no public access, and a trail system would not be built to connect to proposed public trails outside the project area. Effects of the No-Project Alternative on the deterioration of existing neighborhood parks would therefore be expected to be less than significant and comparable to those associated with the proposed project.

Because the No-Project Alternative includes park facilities to serve the added park users, the No-Project Alternative, like the proposed project, is not expected to require the construction of new offsite recreational facilities and there would be no impact.

Transportation

The proposed project would include 3,236 dwelling units, 16 acres of commercial, and 41 acres of office land use. At buildout, the No-Project Alternative would result in the development of 398 residential dwelling units, one school, an arts center, one public park, open space, and roadways. The No-Project Alternative would not include commercial office and agricultural tourism land uses or a trail system.

With 2,838 fewer residences and no office development, the No-Project Alternative would generate less VMT than the proposed project. However, the VMT efficiency of the No-Project Alternative, measured in terms of VMT per capita, would be worse than the proposed project because the residential land uses would be comprised entirely of estate residential and there would less commercial development and no retail development. Therefore, the No-Project Alternative impact would be significant, like under the proposed project, but with higher VMT per capita. Like the mitigation identified for the proposed project, modification of the No-Project Alternative to create a more efficient land use mix would be required to reduce this impact to less than significant. That mitigation, which could include reallocating areas proposed to be zoned for residential and/or arts center to commercial office or retail (or adding additional commercial office or retail), would be based on detailed analysis specific to the No-Project Alternative.

A trail system connecting to proposed trails outside the project area would not be constructed under the No-Project Alternative, and therefore impacts on pedestrian, bicycle, and public transit would be greater than under the proposed project. The number of residential units that would be developed under the No-Project Alternative (398 units) is substantially fewer than those planned under the proposed project (3,236 units), and the No-Project Alternative would not include office uses or areas of agricultural tourism.

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, although not to the same extent that the proposed project would, but the No-Project Alternative would not necessarily promote a sense of community in the same manner. All development would be large lot low density, and neighbors would be distant. The No-Project Alternative would, at least to some extent, meet 3 of the 16 additional project objectives:

- Utilize existing infrastructure and public services.
- Improve connectivity of the regional roadway network.
- Protect important cultural resources

The No-Project Alternative would not meet other objectives listed in Section 4.2.1, *Methods and Screening Criteria*. Because density would be low and spread out, the No-Project Alternative would not meet objectives related to curtailing suburban sprawl, promoting walkable communities, encouraging alternative transportation including bicycling and public transit, fostering sustainable communities, and preserving wildlife corridors. Because the trail system and open space areas would be private, it would not meet objectives related to encouraging recreational opportunities. The lack of medium- and high-density housing would prevent the No-Project Alternative from meeting objectives to broaden the housing stock in the area and no facilities that would promote the El Dorado County agri-tourism industry are included in the No-Project Alternative.

The No-Project Alternative, which is currently approved for 398 2-acre-minimum residential lots, would not be consistent with the MTP/SCS. The MTP/SCS calls for a variety of housing options on varying lot sizes, reduced VMT, increased transit ridership, and increased travel by non-motorized travel modes (bike and walk).

Impact Avoidance

The No-Project Alternative would result in development of only 7 fewer acres but nearly 88% fewer dwelling units and would therefore reduce impacts on resource areas related to population and traffic. Impacts on air quality, noise, population and housing, and public services would be substantially reduced, and the impact related to wastewater would be eliminated because the No-Project Alternative is accounted for in EID's projections. Impacts on GHGs would be less because the No-Project Alternative would have less population and traffic through the immediate area. Some impacts on biological resource would be reduced because there would be fewer acres developed but impacts on cultural resources would be similar to the proposed project because similar known cultural resources would be avoided, and similar mitigation measures would be implemented. Because there would be no changes to land use designations or zoning, land use impacts would be eliminated.

Feasibility

Implementation of the No-Project Alternative would be possible because the 1998 Marble Valley Master Plan has been approved but is expected to experience a long absorption time as larger lots

have less demand and require more time to build out. This alternative would result in substantially fewer residential units within the same acreage but may be more economically difficult to develop (e.g., infrastructure costs per residential unit would be higher than the proposed project).

4.3.2 Alternative 2—Reduced Wetland Impact

The Reduced-Wetland-Impact Alternative, shown in Figure 4-2, is intended to reduce wetland impacts compared with the proposed project through the selective reduction of developed acreage from 1,051 to 759 of the site's 2,341 total acres**.** Through changes to the location and density of development, the impact on wetlands was reduced from 4.6 acres under the proposed project to 0.6 acre under Alternative 2. The vineyard landscaping theme and associated uses would not be developed under the Reduced-Wetland-Impact Alternative, and neither would the office park or Foundation Park. A total of 662 acres of residential, 66 acres of roadways, and 1,573 acres of open space land uses would be developed under the Reduced-Wetland-Impact Alternative (Table 4-1). A total of 6 acres of retail uses, one 20-acre school and joint-use park site, and 15 acres of public parks would be developed. In addition, three private neighborhood parks would be dedicated. No public parks would be included. Buildout of Alternative 2 would result in the development of up to 2,176 residential units, including 267 large-lot, 1,445 low-density, 257 medium-density, and 206 high-density units. Open space areas would be restricted to private use with no public access; the private and public trail system would be reduced or eliminated; and the historic quarrying resources would be protected by a conservation easement and possibly fenced.

Aesthetics

Proposed development under the Reduced-Wetland-Impact Alternative would be reduced, in both acreage of footprint and number of dwelling units, compared with the proposed project. However, overall construction of the Reduced-Wetland-Impact Alternative would be very similar in appearance to the proposed project and would create changes in views of and from the project site over the course of phased development. Construction of the Reduced-Wetland-Impact Alternative would require the removal of fewer oak trees, which are located throughout the site and south of Deer Creek and are an onsite visual amenity. Therefore, the impact on visual resources would be reduced under this alternative but would still be a significant and unavoidable impact, as under the proposed project. The effects of the Reduced-Wetland-Impact Alternative on portions of US 50 with important scenic viewpoints would be similar to the proposed project because the area next to US 50 would remain in open space. Under the Reduced-Wetland-Impact Alternative there would be development just south of the project area's entry road off of US 50, as under the proposed project; however, it would be a village park and a school instead of higher-intensity office park uses as under the proposed project. Similar to the proposed project, the area south of Deer Creek would not be developed. In addition, under the Reduced-Wetland-Impact Alternative, the interior of the site would be less developed. The area around Marble Lake and east of the main entry road, which would serve as the village center under the proposed project, would be left in open space and would not be developed with commercial and higher-density residential land uses.

County policies, zoning ordinances (130.14.170 Outdoor Lighting), design review, and the proposed VMVSP would ensure that the proposed project minimizes lighting impacts to the degree possible. Specifically, County Code Section 130.14.170 requires shielding to avoid impacts on adjoining areas. Both the proposed project and Reduced-Wetland-Impact Alternative would result in new sources of nighttime light in an area that is currently unlit. Mitigation measures identified for the proposed

project would reduce visual impacts under the Reduced-Wetland-Impact Alternative by reducing the amount of glare coming from buildings located within oak woodland and grassland areas. Regardless, the Reduced-Wetland-Impact Alternative would substantially increase the amount of ambient light in the vicinity compared with existing conditions, resulting in visible light pollution and introducing ambient sky glow to the project vicinity. Even with the presence of the remaining tree canopy, new permanent sources of light would be introduced from lighted residences, commercial and entertainment areas, walkways, roadways, parking lots, and accent lighting that would be visible to all viewer groups and would greatly increase light at the project site, which is currently unlit, and result in significant and unavoidable impacts. However, the Reduced-Wetland-Impact Alternative would result in less lighting than under the proposed project, because there would be fewer residences and less commercial development, which tends to be more intensely lit. All of these factors would reduce the Reduced-Wetland-Impact Alternative's impact on scenic vistas and visual resources compared with the proposed project. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e, AES-2, and AES-4 recommended for the proposed project would reduce visual impacts under this alternative, although, like the proposed project, not to a less-than-significant level.

Air Quality

The types of air quality impacts under the Reduced-Wetland-Impact Alternative would be similar to those under the proposed project, but of a lesser magnitude. As with the proposed project, 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-Wetland-Impact Alternative than under the proposed project, criteria pollutant emissions generated by the Reduced-Wetland-Impact Alternative would likely be lower than those estimated for the proposed project. Mitigation Measures AQ-2a through AQ-2f, 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-Wetland-Impact 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-Wetland-Impact 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-Wetland-Impact 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-Wetland-Impact Alternative, which would result in fewer vehicle trips and congestion.

Biological Resources

The impacts on biological resources under the Reduced-Wetland-Impact Alternative as compared with the proposed project would be slightly reduced for riparian habitat; slightly reduced for chaparral habitat; and substantially reduced for oak woodland, annual grassland, and waters of the United States. Due to the increased amount of open space in the northern part of the project area, there would be less removal of most of the plant communities and impacts on waters of the United States would be limited to areas needed for road crossings. Using criteria in the ORMP, oak woodland impacts under Alternative 2 would be 554.95 acres of oak woodland, compared with 689.4 acres of oak woodland impact under the proposed project.. Impacts on waters of the United States would be approximately 0.613 acre under this alternative, compared with 4.585 acres under the proposed project. The riparian impacts would occur in the area along Marble Creek near the confluence with Deer Creek and would be less than the proposed project because the proposed project includes a road that crosses Deer Creek and the adjacent riparian area, whereas Alternative 2 does not.

Impacts on special-status plant species would be similar to those under the proposed project. Impacts on special-status wildlife species would generally be less than those of the proposed project for those species that utilize oak woodland, chaparral, annual grassland, and waters of the United States (including white-tailed kite, burrowing owl, Blainville's horned lizard, and special-status bats) and slightly less for species that utilize riparian habitat (special-status bats). For California red-legged frog and northwestern pond turtle, the Reduced-Wetland-Impact Alternative would affect less potential aquatic habitat (pond) than would the proposed project. The restriction of use and elimination or reduction of a trail system in the open space areas would decrease impacts on wildlife movement and potentially on special-status species that utilize oak woodland as compared with the proposed project.

Mitigation Measures BIO-1a through BIO-22b, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Section 3.3, *Biological Resources*), would still be needed under the Reduced-Wetland-Impact Alternative to ensure that impacts on biological resources are reduced to a less-than-significant level. Because the extent of construction would be less under the Reduced-Wetland-Impact 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 archaeological resources under the Reduced-Wetland-Impact Alternative would be similar to those of the proposed project for known resources, but slightly less for unknown archaeological resources. Under the Reduced-Wetland-Impact Alternative, the development footprint would be smaller, generally resulting in a reduced potential for inadvertent impacts on archaeological resources during construction. Additionally, there would be less access to the larger open space area, reducing the potential for vandalism or accidental disturbance or damage to known resources. Additionally, although the Marble Valley Limestone Mining District would be within a historic park and potentially fenced, it would be a passive historic park. It is likely that interpretation and active conservation of the historic mining district would be minimal. As with the proposed project, construction would occur in areas sensitive for cultural resources and, therefore,

could result in impacts on archaeological resources. In order to reduce impacts on archaeological resources to a less-than-significant level, Mitigation Measures CUL-1a, CUL-1b, CUL-1c, CUL-1d, CUL-1e, CUL-3, and CUL-4, as proposed for the project, would need to be implemented with the Reduced-Wetland-Impact Alternative.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The Reduced-Wetland-Impact Alternative would result in the development of residential and commercial land uses, open space, and roadways. The number of residential units and total footprint acreage that would be developed under the Reduced-Wetland-Impact Alternative would be less than that developed under the proposed project. As a result, less construction activity would be required under the Reduced-Wetland-Impact Alternative, which would lead to fewer overall construction impacts than under the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, mine hazards, and earthquake safety. However, the overall types of potential impacts would not be different under the Reduced-Wetland-Impact Alternative than under the proposed project and the same types of mitigation measures would be necessary to reduce this impact to a less-than-significant level.

Mine Hazards

Impacts related to mine hazards under the Reduced-Wetland-Impact Alternative would be similar to the proposed project. The potential for people to fall into these features and be injured and/or trapped exists under the Reduced-Wetland-Impact Alternative, as it does under the proposed project. As under the proposed project, mitigation measures to establish a process for closing these features and to establish and implement a reporting process for undocumented mining features would reduce the severity of this impact but not to a less-than-significant level. Therefore, as under the proposed project, this impact would be significant and unavoidable under the Reduced-Wetland-Impact Alternative.

Minerals

The impacts on mineral resources under the Reduced-Wetland-Impact Alternative would be similar to those of the proposed project but of a lesser magnitude. Construction under the Reduced-Wetland-Impact Alternative would take place in the same or in nearby areas with the same or similar MRZs. As with the proposed project, although the extent of construction would be less, 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-Wetland-Impact Alternative would be similar to those under the proposed project but of a slightly lesser magnitude. As with the proposed project, this construction could take place in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium, and therefore could result in impacts on paleontological resources. Because, however, the extent of construction is less under the Reduced-Wetland-Impact Alternative than under the proposed project, the impact would be of a slightly lesser magnitude. As with the proposed project, implementation of mitigation measures identified

for the proposed project would reduce impacts under the Reduced-Wetland-Impact Alternative to a less-than-significant level.

Greenhouse Gas Emissions

GHG impacts under the Reduced-Wetland-Impact 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-Wetland-Impact Alternative would likely be lower than those estimated for the proposed project because of the reduced level of development. Compliance with VMVSP 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-Wetland-Impact 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-Wetland-Impact Alternative. However, even with mitigation, the Reduced-Wetland-Impact 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

Impacts on hazards and hazardous materials under the Reduced-Wetland-Impact Alternative would be similar to those of the proposed project but of a lesser magnitude. Under the Reduced-Wetland-Impact Alternative, the construction footprint would decrease from 1,057 acres under the proposed project to 759 acres to avoid wetlands. The Reduced-Wetland-Impact Alternative would develop 1,060 fewer residential units than the proposed project and would develop less commercial space than under the proposed project. As a result, less construction activity would be required under the Reduced-Wetland-Impact Alternative, which would lead to fewer overall construction impacts associated with hazardous materials use than under the proposed project. As under the proposed project, mitigation measures to address NOA (Mitigation Measure AQ-3) and environmental assessments (Mitigation Measures HAZ-2a, HAZ-2b, and HAZ-2c) would be required to reduce construction impacts to a less-than-significant level under this alternative.

Operation-related impacts would also be reduced compared with the proposed project. Much less business-related waste or hazard risk would result because there would be less commercial development. Therefore, business-related hazardous materials impacts under this alternative would not be expected to result in a significant hazard to the public or the environment. Residential impacts, such as generation of household hazardous waste, would be expected to be reduced, as there would be 1,060 fewer residential units and this impact would be less than significant, as under the proposed project.

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. Because there would be less development and fewer

residences under the Reduced-Wetland-Impact Alternative, this impact would be similar but 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 Hills Fire Department or El Dorado County Fire Protection 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-Wetland-Impact Alternative than under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the Reduced-Wetland-Impact Alterative would be similar in nature to those of the proposed project but of a lesser magnitude. Under the Reduced-Wetland-Impact Alternative, the total acreage of the project footprint would be reduced to 759 of the site's 2,341 total acres and there would be 1,537 acres of open space**.** In addition, other impacts on water quality, 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 the Reduced-Wetland-Impact Alternative.

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 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. In addition, the construction of 14 bridges could adversely affect water quality.

With regards to 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 2004b) and the County Drainage Manual (El Dorado County 1995), 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.

Impacts related to placing structures in a 100-year floodplain and altering drainage patterns in a manner that would result in flooding would be similar under the Reduced-Wetland-Impact Alternative though of a lesser magnitude because there would be less development and it would be situated to avoid wetlands which would reduce development in low-lying areas and areas that encourage natural floodwater retention, detention, and percolation. These impacts would be less than significant, as under the proposed project. Impacts related to flooding that could result from a dam failure would be the same as the proposed project, because the project location is the same, and may require implementation of mitigation similar to Mitigation Measure GEO-3d. Mitigation Measure GEO-3d or a similar measure would require evaluation of detention basin embankments, depending on project design specifics, to reduce this impact to a less-than-significant level.

Due to the restriction in the amount of acreage allowed for development under the Reduced-Wetland-Impact Alternative, impacts related to hydrology and water quality would be of a lesser magnitude. The overall development footprint associated with the Reduced-Wetland-Impact Alternative would be less, as would be the construction-related impacts associated with the Reduced-Wetland-Impact Alternative.

Land Use Planning and Agricultural Resources

The Reduced-Wetland-Impact Alternative would involve similar land uses to those proposed under the proposed project. Impacts on land use planning and agricultural resources would be essentially the same as the proposed project. As with the proposed project, development under this alternative would result in the conversion of currently undeveloped land to urban uses and would rearrange the types of planned land uses on the project site. Similar to the proposed project, the Reduced-Wetland-Impact Alternative would not result in any significant impacts related to agriculture and would not divide a community. No important farmland exists on the project site, so development of the site would not result in impacts related to agriculture. Like the proposed project, the Reduced-Wetland-Impact Alternative would likely result in the inclusion of the area in the El Dorado Hills Community Region, which would not be consistent with the General Plan Land Use Diagram and would result in a significant and unavoidable impact.

Noise and Vibration

The Reduced-Wetland-Impact Alternative would result in a smaller development footprint, over 1,000 fewer dwelling units, over 200,000 square feet less commercial space, and more open space than the proposed project. While it is possible the units in the area may be developed over as many years as the proposed project, there are fewer units to develop and the time needed to actively construct them would likely be less than for the proposed project. It is likely that both construction and operation would have reduced impacts relative to the proposed project. Construction noise would be dispersed differently in the project area than the proposed project due to the differing layouts of land uses between the proposed project and this alternative. Fewer existing residences would be exposed to construction noise under the Reduced-Wetland-Impact Alternative because there would be less development near the boundaries of the project area. However, the sensitive land uses that are exposed to construction noise would experience levels noise comparable to those of the proposed project. Thus, Mitigation Measure NOI-1a would still be required to reduce construction noise impacts, though likely not to a less-than-significant level.

Overall, there would be fewer residents and no office employees, and the associated vehicle traffic to generate operational noise under the Reduced-Wetland-Impact Alternative. Traffic noise would occur in slightly different areas than the proposed project. Because the exposure of increased traffic and operational noise generated by the proposed project on new land uses would be significant and unavoidable even with implementation of Mitigation Measure NOI-1b, the exposure of traffic and operational noise generated by Alternative 2 on new land uses would also be significant and unavoidable with Mitigation Measure NOI-1b implemented. Noise impacts resulting from Alternative 2 on sensitive land uses would be the same as the proposed project.

Although Alternative 2 would result in less operational noise than under the proposed project, there could still be a significant increase in noise in the project area on existing land uses, namely at the single residences located adjacent to the roadway at 2080 Marble Valley Road and 4118 Flying C Road. Due to the location of this residence, it is likely that there would be a significant increase in

noise even with the lesser level of development under Alternative 2. Thus, Alternative 2 would also result in a substantial permanent increase in noise. This impact would be significant and unavoidable, the same determination as the proposed project.

As with the proposed project, implementation of Alternative 2 would not likely require impact equipment that could generate substantial ground vibrations. However, similar to the proposed project, implementation of Alternative 2 could potentially involve some blasting that would generate vibration, but Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Because of the type of land uses (residences, open space, roadways) and the resulting construction activities, vibration impacts would not differ substantially from the proposed project.

Because the project location would be the same as for the proposed project, development under Alternative 2 would also not be located near any public or private airports. Additionally, as discussed in Section 3.10, *Noise and Vibration*, the site is not located within the CNEL 55 dB contours of the Cameron Airpark public-use airport. Thus, impacts pertaining to aircraft overflight noise would be less than significant and would not differ from impacts of the proposed project.

Population and Housing

The Reduced-Wetland-Impact Alternative would induce slightly less population growth than the proposed project. Compared with the proposed project, development of the Reduced-Wetland-Impact Alternative would decrease the total number of dwelling units from 3,236 to 2,176. Using projected population factors of average people per unit (3.06 for low density, 2.61 for medium density, and 2.49 for high density), occupancy of the 2,176 new dwelling units associated with this alternative would be expected to increase the county's population by approximately 6,423 people, compared with 9,227 under the proposed project. Therefore, although the Reduced-Wetland-Impact Alternative would not result in as much population growth, this impact would remain significant and unavoidable.

The project area currently contains no housing units. Therefore, as with the proposed project, development under the Reduced-Wetland-Impact Alternative would not displace any existing housing units or necessitate the construction of replacement housing elsewhere but would instead result in the creation of additional housing units on a largely undeveloped site presently surrounded by existing residential and commercial uses. As the area contains no housing units, the Reduced-Wetland-Impact Alternative, like the proposed project, would not displace any people or necessitate the construction of replacement housing elsewhere.

Public Services and Utilities

The impacts related to public services and utilities under the Reduced-Wetland-Impact Alternative would be similar to those under the proposed project but of a lesser magnitude and would be less than significant. The Reduced-Wetland-Impact Alternative would develop 1,060 fewer residential units than the proposed project. With fewer dwelling units and, therefore, fewer residents expected under this alternative, there would be less demand on fire and police services, schools, and libraries than those of the proposed project. It would result in 1,473 school-age children rather than 2,191 under the proposed project, which would result in a reduced demand on schools. Only one 20-acre school is included in the Reduced-Wetland-Impact Alternative whereas two schools on 35 acres are included in the proposed project. If the school did not have sufficient capacity for the proposed project's school-age children, the school district would decide which schools the students would

attend. As described in Section 3.12, *Public Services and Utilities*, payment of school impact fees, as required by SB 50 and provided for under California Government Code Section 65995 et seq., would serve as full and complete mitigation for the demand of additional students on school facilities. 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-Wetland-Impact Alternative would result in less wastewater impacts than the proposed project. Whereas the proposed project would result in a demand of 0.79 million gallons per day (mgd), this alternative would result in 0.51 mgd.[1] 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 0.51 mgd of demand from the Reduced-Wetland-Impact Alternative would result in a total of 3.15 mgd, which would not exceed the permitted capacity of 3.6 mgd. Whereas the proposed project would have 9,227 residents, this alternative would generate approximately 6,423 residents[2], resulting in less demand on potable water, recycled water, solid waste services, electricity, natural gas, and other energy demands. Impacts on utilities would be less than significant under the Reduced-Wetland-Impact Alternative, as under the proposed project. Impacts from the expansion of and connection to infrastructure and offsite improvements would be similar to those under the proposed project, although to a lesser extent because some offsite improvements may not need to be constructed. Mitigation measures similar to those identified for the proposed project would be necessary to mitigate those impacts. Energy- and resource-conserving measures under the Reduced-Wetland-Impact Alternative would likely be similar to the energy-saving policies incorporated in the proposed project. Therefore, energy conservation under the Reduced-Wetland-Impact Alternative would be similar to the proposed project and the impact would be less than significant. Because the overall development footprint associated with the Reduced-Wetland-Impact 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 of the Reduced-Wetland-Impact Alternative would include construction of up to 1,969 single-family and 206 multifamily housing units and would increase the population in an area currently deficient in village and community parkland**.** Using the County's park-planning household sizes of 3.3 people per single-family residential unit and 2.1 per multifamily unit, the Reduced-Wetland-Impact Alternative would be expected to introduce up to 6,930 new park users into the area, compared with the 9,168 new park users anticipated for the proposed project. New park users under the Reduced-Wetland-Impact Alternative represent 76% of the new users associated with the proposed project. This alternative would provide 15 acres of public parkland plus 12 acres of private parkland, and approximately 20 acres of additional acreage as part of the joint-use school facility. Because school facilities are not considered dedicated parkland and Section 120.12.090 of the El Dorado County Code considers private parkland dedication at rates ranging from 50 to 75% of public parkland, the combined public and private park acreage would not meet the parkland requirement of approximately 35 acres for 6,930 residents. At a rate of 50%, the 12 acres of private parkland would count as the equivalent of 6 acres of public parkland; at the maximum rate of 75%,

[1] 1,969 low- and medium-density residential units * 240 gallons per day (gpd) = 472,560 gpd average dry weather flow, or 0.47 mgd. 206 high-density EDUs * 180 gpd = 37,080 ADWF, or 0.037 mgd. 0.037 + 0.47 = 0.51 mgd.

[2] 1,712 VRL*3.06=5,239; 257 VRM*2.61=671; 206 VRH*2.49=513: 5,239+671+513 = 6,423 residents

the 12 acres of private parkland would be equivalent to 9 acres of public parkland. The rate at which private parkland is credited for individual development projects is based on approval by the El Dorado County Board of Supervisors (El Dorado County Code 120.12.090). Together, the public and private parkland would count as the equivalent of 21 to 24 acres of public parkland. Under this alternative open space areas would be restricted to private use, with no public access. The private and public trail system would be reduced or eliminated while the population increases, resulting in less open space acreage and trail mileage available to users. Therefore, the effects of the Reduced-Wetland-Impact Alternative on the deterioration of existing neighborhood parks would be greater than those associated with the proposed project. Mitigation, in the form of an additional 11 to 14 acres of dedicated public parkland or payment of in-lieu fees to meet the parkland dedication requirements, would reduce this significant impact to a less-than-significant level.

Although the Reduced-Wetland-Impact Alternative includes park facilities to serve the added park users, the Reduced-Wetland-Impact Alternative, unlike the proposed project, does not meet the parkland requirement for its projected population and could therefore require the construction of new offsite recreational facilities. This would be a greater impact than that of the proposed project. Mitigation, in the form of an additional 11 to 14 acres of dedicated parkland or payment of in-lieu fees to meet the parkland dedication requirements, would reduce this significant impact to a less-than-significant level.

Transportation and Circulation

The proposed project would include 3,236 dwelling units, 16 acres of commercial, and 41 acres of office land use. At buildout, the Reduced-Wetland-Impact Alternative would result in the development of 2,175 residential dwelling units, 6 acres of commercial retail land use, one school, one public park, open space, and roadways. The Reduced-Wetland-Impact Alternative would not include commercial office land uses and a trail system connecting to proposed trails outside the project area would be reduced or eliminated. The Reduced-Wetland-Impact Alternative would include a mix of residential densities (VRL, VRM, and VRH), but with a higher share allocated to VRL (lower density) units when compared to the proposed project.

With 1,061 fewer residences, less retail development, and no office development, the Reduced-Wetland-Impact Alternative would generate less VMT than the proposed project. However, the VMT efficiency of the Reduced-Wetland-Impact Alternative, measured in terms of VMT per capita, would be worse than the proposed project since the residential land uses would have a higher proportion of lower density units and there would be less commercial development. Therefore, the Reduced-Wetland-Impact Alternative impact would be significant like the proposed project, but with higher VMT per capita, resulting in a greater impact. Like the mitigation identified for the proposed project, modification of the Reduced-Wetland-Impact Alternative to create a more efficient land use mix would be required to reduce this impact to less than significant. That mitigation, which could include increasing residential densities, reallocating areas proposed to be zoned for residential being zoned for commercial office or retail (or adding additional commercial office or retail), would be based on detailed analysis specific to the Reduced-Wetland-Impact Alternative.

A trail system connecting to proposed trails outside the project area that would be constructed under the proposed project would either be reduced or eliminated under the Reduced-Wetland-Impact Alternative, resulting in greater impacts to pedestrian and bicycle circulation. Demand for transit services and facilities associated with this alternative would be anticipated to be approximately two-thirds 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 TRA-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-Wetland-Impact Alternative would make efficient and feasible use of existing infrastructure to the same extent that the proposed project would, but it would not necessarily promote a sense of community in the same manner because it would lack many of the defining elements that are present in the proposed project. No vineyards would be developed, and the small amount of commercial development would be located at the far north end of the project area, not centrally as in the proposed project. The Reduced-Wetland-Impact Alternative would, to some extent, meet 9 of the 16 project objectives.

- Be consistent with MTP/SCS
- Assist in meeting future RHNA needs.
- Broaden the housing stock in El Dorado Hills and Cameron Park.
- Utilize existing infrastructure and public services.
- Improve connectivity of the regional roadway network.
- Encourage future transit opportunities.
- Minimize impacts on oak woodlands.
- Preserve natural habitats and set aside wildlife corridors.
- Protect important cultural resources.

The Reduced-Wetland-Impact Alternative would not meet other objectives listed in Section 4.2.1, *Methods and Screening Criteria*. Because density would be lower and spread out, the Reduced-Wetland-Impact Alternative would not meet objectives related to curtailing suburban sprawl, promoting walkable communities, encouraging alternative transportation including bicycling and public transit, and fostering sustainable communities. Because no trail system would be built and open space areas would be private, it would not meet objectives related to encouraging recreational opportunities. No facilities that would promote the El Dorado County agri-tourism industry are included in the Reduced-Wetland-Impact Alternative.

Impact Avoidance

The Reduced-Wetland-Impact Alternative would reduce impacts on wetlands and on riparian habitat, on special-status species occupying wetland and riparian habitat and on oak woodlands. This alternative would also result in development of nearly 300 fewer acres and approximately 30% fewer dwelling units and would therefore reduce impacts on resource areas related to population. Impacts on air quality, GHG, construction and operation noise, hazardous materials, and demand for public services and utilities would be reduced. Impacts on cultural resources could be increased because the preservation and interpretation under the proposed project would not occur under the

Reduced-Wetland-Impact Alternative. Likewise, because the energy-saving policies in the VMVSP would not be implemented impacts related to energy use would also be greater.

Feasibility

Implementation of the Reduced-Wetland-Impact Alternative may not be economically feasible as the reduction in residential units is more than 30%.

4.3.3 Alternative 3—Reduced Development Footprint

Compared with the proposed project, Alternative 3, the Reduced-Development-Footprint Alternative, would reduce the amount of developable land by approximately 132 acres, and is intended to reduce oak woodland and wetland impacts. The Reduced-Development-Footprint Alternative would leave more of the south part of the project area as open space and would have larger areas designated for medium density land uses toward the center of the project area. Of the 2,341 acres, approximately 925 acres would be developable under the Reduced-Development-Footprint Alternative, with 770 acres proposed for residential uses and 155 acres for other non-open space uses. Buildout of the Reduced-Development-Footprint Alternative would result in development of 3,561 dwelling units, of which 343 would be large lot, 1,202 low density, 422 medium density, and 1,594 high density. Roads would occupy 39 acres; commercial uses would occupy 25 acres; and four private parks and two public parks would occupy 54 acres. Two schools, totaling 36 acres, would also be dedicated under Alternative 3. Approximately 1,417 acres would be devoted to open space, although the public and private trail system would be reduced under the Reduced-Development-Footprint Alternative, and open space areas would be restricted to private use with no public access. The historic quarry and kiln resources would be fenced. The proposed wildlife corridor on the western edge of the project area, along with connectivity to the Bass Lake undercrossing, would be eliminated under Alternative 3. Figure 4-3 presents the conceptual development pattern of the Reduced-Development-Footprint Alternative.

Aesthetics

Construction of the Reduced-Development-Footprint Alternative would be similar to the proposed project and would create changes in views of and from the project site over the course of phased development. However, construction of the Reduced-Development-Footprint would require the removal of fewer oak trees, which are located throughout the site and south of Deer Creek and are an onsite visual amenity. Therefore, this impact would be reduced under this alternative, but would still be a significant and unavoidable impact as under the proposed project. Under the Reduced-Development-Footprint Alternative, the effect on portions of US 50 with important scenic viewpoints would be similar to the proposed project because the areas proposed for development are similar: the area next to US 50 would remain in open space while the area south of the project area's entry road from US 50 would be developed as village commercial and medium-density residential that would be of similar intensity to the office park uses under proposed project. Similar to the proposed project, the area south of Deer Creek would not be developed. In addition, under the Reduced-Development-Footprint Alternative, areas immediate north of Deer Creek would not be developed, and the interior of the site would be less developed than under the proposed project. There would be high-density residential land uses around Marble Lake under the Reduced-Development-Footprint Alternative, very much like the proposed project.

County policies, zoning ordinances (130.14.170 Outdoor Lighting), design review, and the proposed VMVSP would ensure that the proposed project minimizes lighting impacts to the degree possible. Specifically, County Code Section 130.14.170 requires shielding to avoid impacts on adjoining areas. Both the proposed project and Reduced-Development-Footprint Alternative would result in new sources of nighttime light in an area that is currently unlit. Mitigation measures identified for the proposed project would reduce visual impacts under the Reduced-Development-Footprint Alternative by reducing the amount of glare coming from buildings located within oak woodland and grassland areas. Regardless, the Reduced-Development-Footprint Alternative would substantially increase the amount of ambient light in the vicinity compared with existing conditions, resulting in visible light pollution and introducing ambient sky glow to the project vicinity. Even with the presence of the remaining tree canopy, new permanent sources of light would be introduced from lighted residences, commercial and entertainment areas, walkways, roadways, parking lots, and accent lighting that would be visible to all viewer groups and would greatly increase light at the project site, which is currently unlit, and result in significant and unavoidable impacts. However, the Reduced-Development-Footprint Alternative would result in less lighting than the proposed project, because there would be more residences and commercial development in the proposed project, which tends to be more intensely lit. All of these factors would reduce the Reduced-Development-Footprint Alternative's impact on scenic vistas and visual resources compared with 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 this alternative but not to a less-than-significant level.

Air Quality

The types of air quality impacts under the Reduced-Development-Footprint Alternative would be similar to those under the proposed project. Construction emissions would be of a slightly greater magnitude because this alternative would result in the construction of more residences. However, due to the reduced commercial development, this alternative would result in approximately 5% less VMT. As with the proposed project, construction and operation of new building would generate criteria pollutant emissions that could exceed the EDCAQMD's significance thresholds**.** Similar impacts from operational emissions would be expected, but there is the potential for ROG emissions from consumer products to be slightly higher under Alternative 3, relative to the proposed project, as a result of the greater number of residential units. Mitigation Measures AQ-2a through AQ-2f, 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-Development-Footprint Alternative could expose new residents and adjacent sensitive receptors to significant health risks from criteria pollutants and TAC, including DPM, generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the Reduced-Development-Footprint Alternative could be slightly greater than under the proposed project because there would be more construction. 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-Development-Footprint 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-Development-Footprint Alternative, which would result in fewer vehicle trips and congestion.

Biological Resources

Biological resource impacts would be similar under the Reduced-Development-Footprint Alternative for riparian habitat and reduced for oak woodland, chaparral habitat, annual grassland, and waters of the United States, as compared with the proposed project. Due to the increased amount of open space in the southern half of the project area, there would be less removal of all plant communities. Using criteria in the ORMP, oak woodland impacts under Alternative 3 would be 588.87 acres of oak woodland, compared with 689.4 acres of oak woodland impact under the proposed project. Impacts on waters of the United States would be approximately 3.629 acres under this alternative, compared with 4.585 acres under the proposed project.

Impacts on special-status plant species would be similar to those under the proposed project. Impacts on special-status wildlife species would generally be less than those of the proposed project for species that utilize oak woodland, chaparral, annual grassland, and wetlands (including white-tailed kite, burrowing owl, Blainville's horned lizard, and special-status bats) and similar for species that utilize riparian habitat (special-status bats). For California red-legged frog and western pond turtle, the Reduced-Development-Footprint Alternative would affect the same amount of potential aquatic habitat (pond) as the proposed project. The restriction of use and reduction of a trail system in the open space areas would decrease impacts on wildlife movement and potentially on special-status species that utilize oak woodland as compared with the proposed project. However, the proposed wildlife corridor on the western boundary of the project area, along with connectivity to the Bass Lake undercrossing of US 50, would be eliminated under the Reduced-Development-Footprint Alternative, increasing the impact of this alternative on wildlife movement in a north-south direction compared with the proposed project.

Mitigation Measures BIO-1a through BIO-22b, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Section 3.3, *Biological Resources*), would be needed under this alternative to ensure impacts on biological resources are reduced to a less-than-significant level. Because the extent of construction would be smaller under the Reduced-Development-Footprint 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

The impacts on archaeological resources under the Reduced-Development-Footprint Alternative would be similar to those of the proposed project overall, in that most Native American resources would be avoided, but there would be a slightly greater impact on historic-period resources. Under the Reduced-Development-Footprint Alternative, the development footprint would be

approximately 132 acres smaller and therefore reduce the potential to generally affect archaeological resources both directly and indirectly. The southern portion of the project would remain undeveloped, avoiding impacts on eligible Native American archaeological sites and portions of the archaeological district. However, there would be greater impacts on the historic-period archaeological resources associated with the Marble Valley Limestone Mining District. The major features of the resource would be fenced but preservation or interpretive efforts would not occur. Additionally, some Native American sites in the northern part of the project area that contribute to the Marble Valley Archaeological District would be directly affected by residential construction. Finally, the Reduced-Development-Footprint Alternative would result in the construction of 325 more residential units than the proposed project and therefore would introduce more people to the area and increase the potential for site disturbance or vandalism. In order to reduce impacts on archaeological resources to a less-than-significant level, Mitigation Measures CUL-1a, CUL-1b, CUL-1c, CUL-1d, CUL-1e, CUL-3, and CUL-4, as proposed for the project, would need to be implemented. Because less area would be subject to development and excavation, and the southern portion of the site would be no more accessible that it currently is, impacts under the Reduced-Development-Footprint Alternative would be slightly less than under the proposed project.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The impacts on geology and soils under the Reduced-Development-Footprint Alternative would be similar to those of the proposed project. More residential units would be developed under the Reduced-Development-Footprint Alternative than under the proposed project but with a different density mixture and within a smaller footprint. Consequently, a similar level of construction activity would be required under the Reduced-Development-Footprint Alternative, which would lead to a similar level of overall construction impacts compared with the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, mine hazards, and earthquake safety. The overall types and magnitude of potential impacts would not be different under the Reduced-Development-Footprint Alternative than under the proposed project, and Mitigation Measures GEO-1, GEO-3a, GEO-3b, GEO-3c, GEO-3d, and GEO-4, identified for the proposed project, would be necessary under this alternative as well.

Mine Hazards

Impacts related to mine hazards under the Reduced-Development-Footprint Alternative would be similar to the proposed project. The potential for people to fall into these features and be injured and/or trapped exists under the Reduced-Development-Footprint Alternative, as it does under the proposed project. As under the proposed project, mitigation measures to establish a process for closing these features and to establish and implement a reporting process for undocumented mining features would reduce the severity of this impact but not to a less-than-significant level. Therefore, as under the proposed project, this impact would be significant and unavoidable under the Reduced-Development-Footprint Alternative.

Minerals

The impacts on mineral resources under the Reduced-Development-Footprint Alternative would be similar to those of the proposed project. Construction under the Reduced-Development-Footprint Alternative would occur in the same or nearby areas with the same or similar MRZs. As with the

proposed project, although the construction would be different, resulting in more residences within a smaller footprint, 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-Development-Footprint Alternative would be similar to those under the proposed project but of a slightly lesser magnitude. Under the Reduced-Development-Footprint Alternative, the construction footprint would decrease to avoid oak woodlands and wetlands. 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 footprint of construction is slightly less under the Reduced-Development-Footprint Alternative than under the proposed project, the impact would be of a slightly lesser magnitude.

Greenhouse Gas Emissions

GHG impacts under the Reduced-Development-Footprint Alternative would be similar to those under the proposed project, but of a greater magnitude. Similar to criteria air pollutant emissions, construction and operational GHG emissions associated with the Reduced-Development-Footprint Alternative would likely be slightly greater than those estimated for the proposed project. However, due to the reduced commercial development, this alternative would result in approximately 5% less VMT resulting in slightly less operational GHG emissions. Compliance with VMVSP Sustainability Element policies would reduce construction and operational GHG emissions consistent with the relative reductions estimated for the proposed project.

Accordingly, because GHG emissions would be significant under the proposed project, impacts under the Reduced-Development-Footprint Alternative would likewise be significant. Specifically, 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-Development-Footprint Alternative. However, even with mitigation, the Reduced-Development-Footprint 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

Impacts on hazards and hazardous materials under the Reduced-Development-Footprint Alternative would be similar to those of the proposed project. Under the Reduced-Development-Footprint Alternative, the construction footprint would decrease by 132 acres. This alternative would develop 3,561 residential units on 770 acres as opposed to the proposed project, which would develop 3,236 dwelling units on 797 acres. This alternative would develop 25 acres of retail space versus 57 acres of commercial space under the proposed project. Four private parks and 54 acres of public parkland would occur under this alternative rather than the 47 acres in the proposed project, and 1,417 acres of open space would be built under this alternative as opposed to the 1,284 acres of open space included in the proposed project. As a result, more construction activity would occur for residential development, and less construction activity would occur for commercial space, all on less acreage,

under the Reduced-Development-Footprint Alternative, which would lead to similar overall construction impacts as under the proposed project. Mitigation measures identified for the proposed project would be required and would reduce this impact to a less-than-significant level.

Operation-related impacts would be similar to those of the proposed project, with the Reduced-Development-Footprint Alternative allowing more residential units but less retail space than the proposed project would allow. Residential impacts, such as generation of household hazardous waste, would be increased because there would be more residences, but generation of hazardous waste from businesses would decrease. As under the proposed project, businesses and residences would be expected to comply with hazards-related regulations and would not be expected to result in significant hazards to the public or environment and this impact would be less than significant.

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. Therefore, this impact would be similar as 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 Hills Fire Department or El Dorado County Fire Protection District. Because there would be less development but a similar amount of residential units as under the proposed project, the risk of fire to people and structures would be similar under the Reduced-Development-Footprint Alternative as under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the Reduced-Development-Footprint Alternative would be similar in nature to those of the proposed project but of a lesser magnitude. Under the Reduced-Development-Footprint Alternative, total acreage footprint would be reduced to 925 of the site's 2,341 total acres and there would be 1,417 acres of open space. In addition, other impacts on water quality, 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.

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.

With regards to 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 2004b) and the County Drainage Manual (El Dorado County 1995), 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.

Impacts related to placing structures in a 100-year floodplain and altering drainage patterns in a manner that would result in flooding would be similar under the Reduced-Development-Footprint Alternative though of a lesser magnitude because fewer acres would be developed. These impacts would be less than significant, as under the proposed project. Impacts related to flooding that could result from a dam failure would be the same as the proposed project, as the project location is the same, and could be reduced to a less-than-significant level by implementing the same mitigation measures.

Because the footprint of construction would be less under the Reduced-Development-Footprint Alternative than under the proposed project (i.e., there is less acreage of overall development, and more acres of open space), construction-related impacts associated with hydrology and water quality would be of a lesser magnitude.

Land Use Planning and Agricultural Resources

The Reduced-Development-Footprint Alternative, like the proposed project, would result in the conversion of currently undeveloped land to urban uses, rearranging the types of planned land uses on the project site. Compared with the proposed project, this alternative would increase the total number of dwelling units by 325 and decrease the development footprint by 132 acres. However, this alternative would involve similar land uses to those proposed under the proposed project and impacts would be the same as the proposed project.

Similar to the proposed project, this alternative would not result in any significant impacts related to agriculture and would not divide a community. Like the proposed project, the Reduced-Development-Footprint Alternative would likely result in the inclusion of the area in the El Dorado Hills Community Region which would not be consistent with the General Plan Land Use Diagram; however, the impact would be less than significant. No important farmland exists on the project site, so this alternative would also not result in impacts related to agriculture.

Noise and Vibration

The Reduced-Development-Footprint Alternative would construct a smaller development footprint than the proposed project, but it would result in a greater number of dwelling units, retail space, and open space than the proposed project and a fewer number of office units. Although the specific number of units and area would differ between the alternatives, the amount of existing residences affected by construction noise would be comparable to the proposed project. Sensitive land uses that are exposed to construction noise would experience comparable levels of noise compared with the proposed project. As with the proposed project, Mitigation Measure NOI-1a would be required to mitigate construction noise impacts, though not to a less-than-significant level.

Increased residential unit development would result in more severe residential operational noise than under the proposed project, because there would be a greater number of residents generating traffic noise. However, this alternative would have less office space and associated vehicle traffic to generate noise. In total, this alternative would result in slightly less developed square footage than the proposed project, and therefore traffic volumes would be lower by approximately 5%. Consequently, the operational impacts on new land uses in the project area would be slightly less

than the proposed project. Mitigation Measure NOI-1b would still be required, however, to ensure that new land uses would not be exposed to excessive noise.

Although the Reduced-Development-Footprint Alternative would result in slightly less operational noise because there would be less developed square footage than under the proposed project, there could still be a significant increase in noise in the project area on existing land uses, namely at the single residences located adjacent to the roadway at 2080 Marble Valley Road and 4118 Flying C Road. Due to the location of this residence, it is likely that there would be a significant increase in noise even with the lesser level of development under Alternative 3. Thus, the Reduced-Development-Footprint Alternative would also result in a substantial permanent increase in noise. This impact would be significant and unavoidable, the same determination as the proposed project.

As with the proposed project, implementation of the Reduced-Development-Footprint Alternative would not likely require impact equipment that could generate substantial ground vibrations. However, similar to the proposed project, implementation of the Reduced-Development-Footprint Alternative could potentially involve some blasting that would generate vibration, but Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Because of the type of land uses (residences, open space, roadways) and the resulting construction activities, vibration impacts would not differ substantially from the proposed project.

Because the project location would be the same as for the proposed project, development under the Reduced-Development-Footprint Alternative would also not be located near any public or private airports. Additionally, as discussed in Section 3.10, *Noise and Vibration*, the site is not located within the CNEL 55 dB contours of the Cameron Airpark public-use airport. Thus, impacts pertaining to aircraft overflight noise would be less than significant and would not differ from impacts of the proposed project.

Population and Housing

The Reduced-Development-Footprint Alternative would increase density, resulting in development of 3,561 dwelling units rather than the 3,236 units proposed under the proposed project. Of these, 343 would be large-lot, 1,202 low-density, 422 medium-density, and 1,594 high-density residential units. Using projected population factors of average people per unit (3.06 for low density, 2.61 for medium density, and 2.49 for high density), occupancy of the 3,561 dwelling units associated with this alternative would be expected to increase the county's population by approximately 9,798 people, which is 521 more than the proposed project. This alternative would induce slightly more population growth than the proposed project, and the impact would be significant and unavoidable.

The project area currently contains no housing units. Therefore, as with the proposed project, development under this alternative would not displace any existing housing units or necessitate the construction of replacement housing elsewhere but would instead result in the creation of additional housing units on a largely undeveloped site presently surrounded by existing residential and commercial uses. As the area contains no housing units, this alternative, like the proposed project, would not displace any people or necessitate the construction of replacement housing elsewhere.

Public Services and Utilities

The impacts related to public services and utilities under the Reduced-Development-Footprint Alternative would be similar to those under the proposed project but of a slightly higher magnitude.

Under the Reduced-Development-Footprint Alternative, the construction footprint would decrease by 132 acres, but would increase the number of residents. This alternative would develop 3,561 residential units on 770 acres as opposed to the proposed project, which would develop 3,236 dwelling units on 797 acres.

The increase in the number of dwelling units would result in more demand on schools, parks, and libraries than the proposed project. It would also result in a slightly higher demand on wastewater, potable water, recycled water, and solid waste services. More dwelling units and, therefore, more residents are expected under this alternative, causing more demand on fire and police services. This alternative would result in 2,411 school-age children rather than 2,191 as under the proposed project, resulting in more demand on schools. As described in Section 3.12, *Public Services and Utilities*, payment of school impact fees, as required by SB 50 and provided for under California Government Code Section 65995 et seq., would serve as full and complete mitigation for the demand of additional students on school facilities. 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-Development-Footprint Alternative would result in less wastewater impacts than the proposed project. This alternative would result in 0.76 mgd of wastewater average dry weather flow,[3] whereas the proposed project would result in a demand of 0.79 mgd. 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 0.76 mgd of demand from this alternative would result in a total of 3.4 mgd, which would not exceed the permitted capacity of 3.6 mgd.

The Reduced-Development-Footprint Alternative would result in up to 9,798 residents[4], whereas the proposed project would result in up to 9,227 residents. This would result in an increased demand on potable water, recycled water, solid waste services, dry utilities, electricity, natural gas, and other energy demands. As described in Section 3.12, *Public Services and Utilities*, Impact PSU-10, the same energy- and resource-conserving effects that would occur under the proposed project would occur under this alternative. Although the overall development footprint associated with this alternative would be slightly smaller than under the proposed project, resulting in slightly less construction-related effects, the increase in residents would create a slightly higher demand for public services, utilities, and energy.

Recreation

Development under the Reduced-Development-Footprint Alternative would include construction of up to 1,967 single-family and 1,594 multifamily housing units, increasing the population in an area currently deficient in village and community parkland**.** Using the County's park-planning household sizes of 3.3 people per single-family residential unit and 2.1 people per multifamily unit, this alternative would be expected to introduce approximately 9,838 park users into the area, compared with 9,168 new park users for the proposed project, or 107% of the park users anticipated under the proposed project. The Reduced-Development-Footprint Alternative would provide 54 acres of new public parkland, exceeding the 49 acres of parkland required to accommodate 9,838 people. Effects of this alternative on the deterioration of existing neighborhood parks would therefore be

[3] 1,967 low- and medium-density residential units * 240 gpd = 472,080 ADWF, or 0.47 mgd. 1,594 high-density EDUs * 180 gpd = 286,920 ADWF, or 0.29 mgd. 0.47+0.29=0.76

[4] 1,545 VRL*3.06=4,728; 422 VRM*2.61=1,101; 1,594 VRH*2.49=3,969: 4,728+1,101+3,969= 9,798 residents.

expected to be less than those associated with the proposed project, which would be less than significant.

Because the Reduced-Development-Footprint Alternative includes park facilities to serve the added park users, the Reduced-Development-Footprint Alternative, like the proposed project is not expected to require the construction of new offsite recreational facilities and there would be no impact.

Transportation and Circulation

The proposed project would include 3,236 dwelling units, 16 acres of commercial, and 41 acres of office land use. At buildout, the Reduced-Development-Footprint Alternative would result in the development of 3,561 residential dwelling units, 25 acres of commercial retail land use, two schools, several public parks, open space, and roadways. The Reduced-Development-Footprint Alternative would not include commercial office land uses and a trail system connecting to proposed trails outside the project area would be reduced. The Reduced-Development-Footprint Alternative would include a mix of residential densities (VRL, VRM, and VRH), but with a higher share allocated to VRM and VRH (higher density) units compared to the proposed project.

With 325 more residences, a similar amount of retail development, and no office development, the Reduced-Development-Footprint Alternative would generate less VMT than the proposed project. The VMT efficiency of the Reduced-Development-Footprint Alternative, measured in terms of VMT per capita, would be similar to the proposed project even with the allocation of residential land use to higher-density units, since the alternative lacks office development. Therefore, the Reduced-Development-Footprint Alternative impact would be significant, with similar VMT per capita to the proposed project, resulting in a similar impact. Like the mitigation identified for the proposed project, modification of the Reduced-Development-Footprint Alternative to create a more efficient land use mix would be required to reduce this impact to less than significant. That mitigation, which could include reallocating areas proposed to be zoned for residential being zoned for commercial office or retail, would be based on detailed analysis specific to the Reduced-Development-Footprint Alternative.

A trail system connecting to proposed trails outside the project area would be reduced under the Reduced-Development-Footprint Alternative as compared with the proposed project resulting in a slightly greater impact on bicycle and pedestrian circulation. Demand for transit services and facilities associated with this alternative would be anticipated to be similar to 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 TRA-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-Development-Footprint Alternative would make efficient and feasible use of existing infrastructure to the same extent that the proposed project would. The inclusion of village parks and the location of residential units would likely help to promote a sense of community though it would lack the commercial center that provides a different

type of gathering space for neighbors. The Reduced-Development-Footprint Alternative would, at least to some extent meet 11 of the 16 additional project objectives.

- Be consistent with MTP/SCS
- Curtail suburban sprawl.
- Assist in meeting future RHNA needs.
- Broaden the housing stock in El Dorado Hills and Cameron Park.
- Provide a strong community identity and quality built environment.
- Utilize existing infrastructure and public services.
- Improve connectivity of the regional roadway network.
- Encourage future transit opportunities.
- Minimize impacts on oak woodlands.
- Preserve natural habitats and set aside wildlife corridors.
- Protect important cultural resources.

The Reduced-Development-Footprint Alternative would not meet other objectives listed in Section 4.2.1, *Methods and Screening Criteria*. No trail or bike path system would be constructed; therefore, the Reduced-Development-Footprint Alternative would not meet objectives related to encouraging non-motorized transportation and recreational opportunities, or expansion of the regional trail system. The location of development would result in greater impacts on the historic district, which would be fenced, but no interpretation would occur. No facilities that would promote the El Dorado County agri-tourism industry are included in the Reduced-Development-Footprint Alternative.

Impact Avoidance

The Reduced-Development-Footprint Alternative would reduce impacts on oak woodlands, wetlands, and on special-status species that occupy those habitats. It would also reduce impacts on plant communities, as a large portion of the southern area of the site would be left undeveloped. This alternative would also result in development of 132 fewer acres, though it would result in more dwelling units and more population growth. Because the footprint would be smaller, impacts on hydrology, undiscovered cultural resources, and paleontological resources would be slightly reduced. However, because there are more residential units, and therefore more residents, impacts related to population, such as demand for public services and utilities, would be greater. Impacts on biological resources would be reduced because there would be fewer acres developed but impacts on cultural resources, particularly this historic district, could be increased because the preservation and interpretation under the proposed project would not occur under this alternative. Likewise, because the energy-saving policies in the VMVSP would not be implemented, impacts related to energy use would also be greater.

Feasibility

Implementation of the Reduced-Development-Footprint Alternative would likely be economically feasible as the number of residential units is comparable. However, the larger percentage of multifamily units may reduce the feasibility of this alternative.

4.3.4 Alternative 4—Minimal Oak Impact

Compared with the proposed project, Alternative 4, the Minimal-Oak-Impact Alternative, would reduce the amount of developable land by approximately 541 acres, and is intended to reduce oak woodland impacts. The Minimal-Oak-Impact Alternative would leave more of the south part of the project area as open space and would have larger areas designated for medium-density land uses in the center and to the east of the project area. Of the 2,341 acres, approximately 516 acres would be developable under the Minimal-Oak-Impact Alternative, with 423 acres proposed for residential uses, one 22-acre school and joint-use park site, 22 acres of roadway, and 50 acres of public parks. In addition, one private neighborhood park would be dedicated. No commercial development would occur under this alternative. Buildout of Alternative 4 would result in the development of up to 2,274 residential units, including 911 low-density, 785 medium-density, and 578 high-density units. There would be no large-lot residential units under this alternative. Approximately 1,825 acres would be devoted to open space, reducing oak canopy impacts to 89 acres from 227.2 acres under the proposed project under General Plan Policy 7.4.4.4, and reducing oak woodland impacts to 204.84 acres from 689.6 acres under the proposed project under the ORMP. Figure 4-4 presents the conceptual development pattern of the Minimal-Oak-Impact Alternative.

Open space areas would be restricted to private use with no public access; the private and public trail system would be reduced or eliminated; and the historic quarry resources would be protected by a conservation easement and possibly fenced.

Aesthetics

Aesthetic impacts under the Minimal-Oak-Impact Alternative would be similar to those under the proposed project, but of a lesser magnitude. Construction of the Minimal-Oak-Impact Alternative would be similar to the proposed project and would create changes in views of and from the project site over the course of phased development. However, construction of the Minimal-Oak-Impact Alternative would require the removal of fewer oak trees, which are located throughout the site and south of Deer Creek and are an onsite visual amenity. Therefore, this impact would be reduced under this alternative, but would still be a significant and unavoidable impact as under the proposed project. Under the Minimal-Oak-Impact Alternative, the effect on portions of US 50 with important scenic viewpoints would be reduced compared with the proposed project because the areas proposed for development differ: the area next to US 50 would remain in open space as with the proposed project, while the area south of the project area's entry road from US 50 would be developed as public school and village park under the Minimal-Oak-Impact Alternative, whereas office park uses are located in this area under the proposed project. Similar to the proposed project, the area south of Deer Creek would not be developed. In addition, under the Minimal-Oak-Impact Alternative, areas immediate north of Deer Creek would not be developed, and the interior of the site would be less developed than under the proposed project. There would be high-density residential land uses around Marble Lake under the Minimal-Oak-Impact Alternative, very much like the proposed project. No village commercial or office space land uses are proposed under the Minimal-Oak-Impact Alternative.

County policies, zoning ordinances (130.14.170 Outdoor Lighting), design review, and the proposed VMVSP would ensure that the proposed project minimizes lighting impacts to the degree possible. Specifically, County Code Section 130.14.170 requires shielding to avoid impacts on adjoining areas. Both the proposed project and Minimal-Oak-Impact Alternative would result in new sources of nighttime light in an area that is currently unlit. Mitigation measures identified for the proposed

project would reduce visual impacts under the Minimal-Oak-Impact Alternative by reducing the amount of glare coming from buildings located within oak woodland and grassland areas. Regardless, the Minimal-Oak-Impact Alternative would substantially increase the amount of ambient light in the vicinity compared with existing conditions, resulting in visible light pollution and introducing ambient sky glow to the project vicinity. Even with the presence of the remaining tree canopy, new permanent sources of light would be introduced from lighted residences, walkways, roadways, parking lots, and accent lighting that would be visible to all viewer groups and would greatly increase light at the project site, which is currently unlit, and result in significant and unavoidable impacts. However, the Minimal-Oak-Impact Alternative would result in less lighting than the proposed project, because there would be more residences, office spaces, and commercial development in the proposed project, which tends to be more intensely lit. All of these factors would reduce the Minimal-Oak-Impact Alternative's impact on scenic vistas and visual resources compared with 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 this alternative but not to a less-than-significant level.

Air Quality

The types of air quality impacts under the Minimal-Oak-Impact Alternative would be similar to those under the proposed project, but of a lesser magnitude. As with the proposed project, 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 Minimal-Oak-Impact Alternative than under the proposed project, criteria pollutant emissions generated by the Minimal-Oak-Impact Alternative would likely be lower than those estimated for the proposed project. Mitigation Measures AQ-2a through AQ-2f, 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 Minimal-Oak-Impact Alternative could expose new residents and adjacent sensitive receptors to significant health risks from criteria pollutants and TAC, including DPM, generated by equipment and vehicle exhaust. Emissions and thus health risks resulting from buildout of the Minimal-Oak-Impact 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 Minimal-Oak-Impact 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 Minimal-Oak-Impact Alternative, which would result in fewer vehicle trips and congestion.

Biological Resources

Biological resource impacts would be substantially reduced under the Minimal-Oak-Impact Alternative for oak woodland and reduced to a lesser extent for riparian habitat, chaparral habitat, annual grassland, and waters of the United States, as compared with the proposed project. Due to smaller development footprints of this alternative, there would be less removal of all plant communities. Using criteria in the ORMP, oak woodland impacts under Alternative 2 would be 204.84 acres of oak woodland, compared with 689.4 acres of oak woodland impact under the proposed project. Impacts on waters of the United States would be approximately 3.699 acres under this alternative, compared with 4.585 acres under the proposed project.

Impacts on special-status plant species would be less than those under the proposed project. Impacts on special-status wildlife species would generally be less than those of the proposed project for species that utilize oak woodland, riparian habitat, chaparral, annual grassland, and wetlands (including white-tailed kite, burrowing owl, Blainville's horned lizard, and special-status bats). For California red-legged frog and northwestern pond turtle, the Minimal-Oak-Impact Alternative would affect the same amount of potential aquatic habitat (pond) as the proposed project. The restriction of use and reduction of a trail system in the open space areas would decrease impacts on wildlife movement and potentially on special-status species that utilize oak woodland as compared with the proposed project. However, the proposed wildlife corridor on the western boundary of the project area, along with connectivity to the Bass Lake undercrossing of US 50, would be eliminated under the Minimal-Oak-Impact Alternative, increasing the impact of this alternative on wildlife movement in a north-south direction compared with the proposed project.

Mitigation Measures BIO-1a through BIO-22b, as proposed for the project (listed in the Executive Summary Table ES-1, and described in Section 3.3, *Biological Resources*), would be needed under this alternative in order to ensure impacts on biological resources are reduced to a less-than-significant level. Because the extent of construction would be smaller under the Minimal-Oak-Impact Alternative than under the proposed project, the impact on biological resources identified in the project area would be of a lesser magnitude.

Cultural Resources

Impacts on archaeological resources under the Minimal-Oak-Impact Alternative would be less than those of the proposed project. This alternative would result in approximately 50% less developed acreage than the proposed project. Several known sites that could be affected under the proposed project would be in areas designated for open space under this alternative. Under the Minimal-Oak-Impact Alternative, the development footprint would be smaller, generally resulting in a reduced potential for inadvertent impacts on archaeological resources during construction. Additionally, there would be less access to the larger open space area, reducing the potential for vandalism or accidental disturbance or damage to known resources. Additionally, while the Marble Valley Limestone Mining District would be included in a historic park and potentially fenced, it would be a passive historic park. It is likely that interpretation and active conservation of the historic mining district would be minimal. As with the proposed project, construction would occur in areas sensitive for cultural resources and, therefore, could result in impacts on archaeological resources. In order to reduce impacts on archaeological resources to a less-than-significant level, Mitigation Measures

CUL-1a, CUL-1b, CUL-1c, CUL-1d, CUL-1e, CUL-3, and CUL-4, as proposed for the project, would need to be implemented with the Minimal-Oak-Impact Alternative.

Geology, Soils, Minerals, and Paleontological Resources

Geology and Soils Resources

The Minimal-Oak-Impact Alternative would result in the development of residential land uses, open space, and roadways. The number of residential units and total footprint acreage that would be developed under the Minimal-Oak-Impact Alternative would be less than that developed under the proposed project. As a result, less construction activity would be required under the Minimal-Oak-Impact Alternative, which would lead to fewer overall construction impacts than under the proposed project. Site-specific investigation would be necessary to address issues such as slope stability, expansive soils, mine hazards, and earthquake safety. However, the overall types of potential impacts would not be different under the Minimal-Oak-Impact Alternative than under the proposed project and the same types of mitigation measures would be necessary to reduce this impact to a less-than-significant level.

Mine Hazards

Impacts related to mine hazards under the Minimal-Oak-Impact Alternative would be similar to the proposed project. The potential for people to fall into these features and be injured and/or trapped exists under the Minimal-Oak-Impact Alternative, as it does under the proposed project. As under the proposed project, mitigation measures to establish a process for closing these features and to establish and implement a reporting process for undocumented mining features would reduce the severity of this impact but not to a less-than-significant level. Therefore, as under the proposed project, this impact would be significant and unavoidable under the Minimal-Oak-Impact Alternative.

Minerals

The impacts on mineral resources under the Minimal-Oak-Impact Alternative would be similar to those of the proposed project but of a lesser magnitude. Construction under the Minimal-Oak-Impact Alternative would take place in the same or in nearby areas with the same or similar MRZs. As with the proposed project, although the extent of construction would be less, 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 Minimal-Oak-Impact Alternative would be similar to those under the proposed project but of a slightly lesser magnitude. As with the proposed project, this construction could take place in units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium, and therefore could result in impacts on paleontological resources. Because, however, the extent of construction is less under the Minimal-Oak-Impact Alternative than under the proposed project, the impact would be of a slightly lesser magnitude. As with the proposed project, implementation of mitigation measures identified for the proposed project would reduce impacts under the Minimal-Oak-Impact Alternative to a less-than-significant level.

Greenhouse Gas Emissions

GHG impacts under the Minimal-Oak-Impact 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 Minimal-Oak-Impact Alternative would likely be lower than those estimated for the proposed project because of the reduced level of development. Compliance with VMVSP 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 Minimal-Oak-Impact 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 Minimal-Oak-Impact Alternative. However, even with mitigation, the Minimal-Oak-Impact 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

Impacts on hazards and hazardous materials under the Minimal-Oak-Impact Alternative would be similar to those of the proposed project but of a lesser magnitude. Under the Minimal-Oak-Impact Alternative, the construction footprint would decrease from 1,057 acres under the proposed project to 516 acres to avoid oak trees. The Minimal-Oak-Impact Alternative would develop 962 fewer residential units than the proposed project and would not develop any commercial space. As a result, less construction activity would be required which would lead to fewer overall construction impacts associated with hazardous materials use than under the proposed project. As under the proposed project, similar mitigation measures to address NOA (Mitigation Measure AQ-3) and environmental assessments (Mitigation Measures HAZ-2a, HAZ-2b, and HAZ-2c) would be required to reduce construction impacts to a less-than-significant level under this alternative.

Operation-related impacts would also be reduced compared with the proposed project. No business-related waste or hazard risk would result because there would be no commercial development. Residential impacts, such as generation of household hazardous waste, would be expected to be reduced, as there would be 962 fewer residential units and this impact would be less than significant, as under the proposed project.

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. Because there would be less development and fewer residences under the Minimal-Oak-Impact Alternative, this impact would be similar but 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 Hills Fire Department or El Dorado County Fire Protection 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 Minimal-Oak-Impact Alternative than under the proposed project.

Hydrology, Water Quality, and Water Resources

The impacts on hydrology, water quality, and water resources under the Minimal-Oak-Impact Alternative would be similar in nature to those of the proposed project but of a lesser magnitude. Under the Minimal-Oak-Impact Alternative, the total acreage of the project footprint would be reduced to 516 of the site's 2,341 total acres and there would be 1,825 acres of open space**.** In addition, other impacts on water quality, 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 the Minimal-Oak-Impact Alternative.

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 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. In addition, the construction of 14 bridges could adversely affect water quality.

With regards to 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 2004b) and the County Drainage Manual (El Dorado County 1995), 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.

Impacts related to placing structures in a 100-year floodplain and altering drainage patterns in a manner that would result in flooding would be similar under the Minimal-Oak-Impact Alternative though of a lesser magnitude because there would be less development and it would be situated to avoid wetlands which would reduce development in low-lying areas and areas that encourage natural floodwater retention, detention, and percolation. These impacts would be less than significant, as under the proposed project. Impacts related to flooding that could result from a dam failure would be the same as the proposed project, because the project location is the same, and may require implementation of mitigation similar to Mitigation Measure GEO-3d. Mitigation Measure GEO-3d or a similar measure would require evaluation of detention basin embankments, depending on project design specifics, to reduce this impact to a less-than-significant level.

Due to the restriction in the amount of acreage allowed for development under the Minimal-Oak-Impact Alternative, impacts related to hydrology and water quality would be of a lesser magnitude. The overall development footprint associated with the Minimal-Oak-Impact Alternative would be less, as would be the construction-related impacts associated with Minimal-Oak-Impact Alternative.

Land Use Planning and Agricultural Resources

The Minimal-Oak-Impact Alternative, like the proposed project, would result in the conversion of currently undeveloped land to urban uses, rearranging the types of planned land uses on the project site. Compared with the proposed project, this alternative would decrease the total number of dwelling units by 962 and decrease the development footprint by 541 acres. However, this alternative would involve similar land uses to those proposed under the proposed project and impacts would be the same as the proposed project.

Similar to the proposed project, this alternative would not result in any significant impacts related to agriculture and would not divide a community. Like the proposed project, the Minimal-Oak-Impact Alternative would likely result in the inclusion of the area in the El Dorado Hills Community Region which would not be consistent with the General Plan Land Use Diagram; however, the impact would be less than significant. No important farmland exists on the project site, so this alternative would also not result in impacts related to agriculture.

Noise and Vibration

The Minimal-Oak-Impact Alternative would construct a smaller development footprint than the proposed project, including a fewer number of dwelling units, a smaller footprint of school land use space, no commercial or office space but slightly more public park acreage. While it is possible the development may be constructed over as many years as the proposed project, there are fewer units and space to develop, and the time needed to actively construct them would likely be less than for the proposed project. It is likely that both construction and operation would have reduced impacts relative to the proposed project. Construction noise would be dispersed differently in the project area than the proposed project due to the differing layouts of land uses between the proposed project and this alternative. Fewer existing residences would be exposed to construction noise under the Minimal-Oak-Impact Alternative because there would be less development near the boundaries of the project area. However, the sensitive land uses that are exposed to construction noise would experience levels of noise comparable to those of the proposed project. Thus, Mitigation Measure NOI-1a would still be required to reduce construction noise impacts, though likely not to a less-than-significant level.

Overall, there would be fewer residents and no office employees and the associated vehicle traffic that would generate operational noise under the Minimal-Oak-Impact Alternative. Traffic noise would occur in slightly different areas than the proposed project. Because the exposure of increased traffic and operational noise generated by the proposed project on new land uses would be significant and unavoidable even with implementation of Mitigation Measure NOI-1b, the exposure of traffic and operational noise generated by the Minimal-Oak-Impact Alternative on new land uses would also be significant and unavoidable with Mitigation Measure NOI-1b implemented. Noise impacts resulting from the Minimal-Oak-Impact Alternative on sensitive land uses would be the same as the proposed project.

Although the Minimal-Oak-Impact Alternative would result in less operational noise than under the proposed project, there could still be a significant increase in noise in the project area on existing land uses, namely at the single residences located adjacent to the roadway at 2080 Marble Valley Road and 4118 Flying C Road. Due to the location of this residence, it is likely that there would be a significant increase in noise even with the lesser level of development under the Minimal-Oak-Impact Alternative. Thus, the Minimal-Oak-Impact Alternative would also result in a substantial

permanent increase in noise. This impact would be significant and unavoidable, the same determination as the proposed project.

As with the proposed project, implementation of the Minimal-Oak-Impact Alternative would not likely require impact equipment that could generate substantial ground vibrations. However, similar to the proposed project, implementation of the Minimal-Oak-Impact Alternative could potentially involve some blasting that would generate vibration, but Mitigation Measure NOI-2 would reduce blasting impacts to a less-than-significant level. Because of the type of land uses (residences, open space, roadways) and the resulting construction activities, vibration impacts would not differ substantially from the proposed project.

Because the project location would be the same as for the proposed project, development under the Minimal-Oak-Impact Alternative would also not be located near any public or private airports. Additionally, as discussed in Section 3.10, *Noise and Vibration*, the site is not located within the CNEL 55 dB contours of the Cameron Airpark public-use airport. Thus, impacts pertaining to aircraft overflight noise would be less than significant and would not differ from impacts of the proposed project.

Population and Housing

The Minimal-Oak-Impact Alternative would induce less population growth than the proposed project. Compared with the proposed project, development of the Minimal-Oak-Impact Alternative would decrease the total number of dwelling units from 3,236 to 2,274. Using projected population factors of average people per unit (3.06 for low density, 2.61 for medium density, and 2.49 for high density), occupancy of the 2,274 new dwelling units associated with this alternative would be expected to increase the county's population by approximately 6,276 people, compared with 9,227 under the proposed project. Therefore, although the Minimal-Oak-Impact Alternative would not result in as much population growth, this impact would be significant and unavoidable, as it is under the proposed project.

The project area currently contains no housing units. Therefore, as with the proposed project, development under the Minimal-Oak-Impact Alternative would not displace any existing housing units or necessitate the construction of replacement housing elsewhere but would instead result in the creation of additional housing units on a largely undeveloped site presently surrounded by existing residential and commercial uses. As the area contains no housing units, the Minimal-Oak-Impact Alternative, like the proposed project, would not displace any people or necessitate the construction of replacement housing elsewhere.

Public Services and Utilities

The impacts related to public services and utilities under the Minimal-Oak-Impact Alternative would be similar to those under the proposed project but of a lesser magnitude and would be less than significant. The Minimal-Oak-Impact Alternative would develop 962 fewer residential units than the proposed project. With fewer dwelling units and, therefore, fewer residents expected under this alternative, there would be less demand on fire and police services, schools, and libraries than those of the proposed project. It would result in 1,539 school-age children rather than 2,191 under the proposed project, which would result in a reduced demand on schools. Only one 22-acre school is included in the Minimal-Oak-Impact Alternative whereas two schools on 35 acres are included in the proposed project**.** If the school did not have sufficient capacity for the proposed project's school-age

children, the school district would decide which schools the students would attend. As described in Section 3.12, *Public Services and Utilities*, payment of school impact fees, as required by SB 50 and provided for under California Government Code Section 65995 et seq., would serve as full and complete mitigation for the demand of additional students on school facilities. 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 Minimal-Oak-Impact Alternative would result in less wastewater impacts than the proposed project. Whereas the proposed project would result in a demand of 0.79 mgd, this alternative would result in 0.51 mgd.[5] 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 0.51 mgd of demand from the Minimal-Oak-Impact Alternative would result in a total of 3.15 mgd, which would not exceed the permitted capacity of 3.6 mgd. Whereas the proposed project would have 9,227 residents, this alternative would generate approximately 6,276 residents[6], resulting in less demand on potable water, recycled water, solid waste services, electricity, natural gas, and other energy demands. Impacts on utilities would be less than significant under the Minimal-Oak-Impact Alternative, as under the proposed project. Impacts from the expansion of and connection to infrastructure and offsite improvements would be similar to those under the proposed project, although to a lesser extent because some offsite improvements may not need to be constructed. Mitigation measures similar to those identified for the proposed project would be necessary to mitigate those impacts. Energy- and resource-conserving measures under the Minimal-Oak-Impact Alternative would likely be similar to the energy-saving policies incorporated in the proposed project. Therefore, energy conservation under the Minimal-Oak-Impact Alternative would be similar to the proposed project and the impact would be less than significant. Because there are fewer residential units associated with the Minimal-Oak-Impact Alternative, impacts would be less than the proposed project; construction and operation of this alternative would cause less demand for public services, utilities, and energy.

Recreation

Development of the Minimal-Oak-Impact Alternative would include construction of up to 1,696 single-family and 578 multifamily housing units and would increase the population in an area currently deficient in village and community parkland**.** Using the County's park-planning household sizes of 3.3 people per single-family residential unit and 2.1 per multifamily unit, the Reduced-Wetland-Impact Alternative would be expected to introduce up to 6,811 new park users into the area, compared with the 9,168 new park users anticipated for the proposed project. New park users under the Minimal-Oak-Impact Alternative represent 74% of the new users associated with the proposed project. This alternative would provide 50 acres of public parkland plus one private neighborhood park, and 22 additional acres as part of the joint-use school facility. School facilities are not considered dedicated parkland and Section 120.12.090 of the El Dorado County Code considers private parkland dedication at rates ranging from 50 to 75% of public parkland. However, the 50 acres of public parkland acreage would meet and exceed the parkland requirement of approximately 35 acres for 6,811 residents. Therefore, the effects of the Minimal-Oak-Impact

[5] 1,696 low- and medium-density residential units * 240 gpd = 407,040 gpd average dry weather flow, or 0.41 mgd. 578 high-density EDUs * 180 gpd = 104,040 ADWF, or 0.10 mgd. 0.10 + 0.41 = 0.51 mgd.

[6] 911 VRL*3.06=2,788; 785 VRM*2.61=2,049; 578 VRH*2.49=1,439: 2,788+2,049+1,439 = 6,276 residents

Alternative on the deterioration of existing neighborhood parks would be less than those associated with the proposed project, and less than significant. No mitigation would be required.

Because the Minimal-Oak-Impact Alternative provides adequate park facilities to serve the added park users, the Minimal-Oak-Impact Alternative, like the proposed project, meets the parkland requirement for its projected population and would not require the construction of new offsite recreational facilities. This would be a less-than-significant impact and no mitigation is required.

Transportation and Circulation

The proposed project would include 3,236 dwelling units, 16 acres of commercial, and 41 acres of office land use. At buildout, the Minimal-Oak-Impact Alternative would result in the development of 2,274 residential dwelling units, one school, several public parks, open space, and roadways. The Minimal-Oak-Impact Alternative would not include commercial retail or office land uses. The Minimal-Oak-Impact Alternative would include a mix of residential densities (VRL, VRM, and VRH), but with a higher share allocated to VRM and VRH (higher density) units compared to the proposed project.

With 962 fewer residences and no commercial retail or office development, the Minimal-Oak-Impact Alternative would generate less VMT than the proposed project. The VMT efficiency of Minimal-Oak-Impact Alternative, measured in terms of VMT per capita, would be worse than the proposed project even with the allocation of residential land use to higher-density units since the alternative lacks commercial retail and office development. Therefore, the Minimal-Oak-Impact Alternative impact would be significant like the proposed project, but with higher VMT per capita, resulting in a greater impact. Like the mitigation identified for the proposed project, modification of the Minimal-Oak-Impact Alternative to create a more efficient land use mix would be required to reduce this impact to less than significant. That mitigation, which could include reallocating areas proposed to be zoned for residential being zoned for commercial office or retail (or adding additional commercial office or retail), would be based on detailed analysis specific to the Minimal-Oak-Impact Alternative.

The trail system proposed under the proposed project would be reduced or eliminated and therefore impacts on bicycle and pedestrian resources would be greater. Demand for transit services and facilities associated with this alternative would be anticipated to be approximately two-thirds 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 TRA-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 Minimal-Oak-Impact Alternative would make efficient and feasible use of existing infrastructure, though not to the same extent that the proposed project would. The inclusion of village parks and the location of residential units would likely help to promote a sense of community though it would lack the commercial center that provides a different

type of gathering space for neighbors. The Minimal-Oak-Impact Alternative would, at least to some extent meet 11 of the 16 additional project objectives.

- Be consistent with MTP/SCS.
- Curtail suburban sprawl.
- Assist in meeting future RHNA needs.
- Broaden the housing stock in El Dorado Hills and Cameron Park.
- Provide a strong community identity and quality built environment.
- Utilize existing infrastructure and public services.
- Improve connectivity of the regional roadway network.
- Encourage future transit opportunities.
- Minimize impacts on oak woodlands.
- Preserve natural habitats and set aside wildlife corridors.
- Protect important cultural resources.

The Minimal-Oak-Impact Alternative would not meet other objectives listed in Section 4.2.1, *Methods and Screening Criteria*. No trail or bike path system would be constructed; therefore, the Minimal-Oak-Impact Alternative would not meet objectives related to encouraging non-motorized transportation and recreational opportunities, or expansion of the regional trail system. No facilities that would promote the El Dorado County agri-tourism industry are included in this alternative.

Impact Avoidance

The Minimal-Oak-Impact Alternative would reduce impacts on oak woodlands, wetlands, and riparian and chaparral habitat, and on special-status species that occupy those habitats. It would also reduce impacts on plant communities, as most of the southern area of the site would be left undeveloped. This alternative would also result in development of 541 fewer acres and construction of 962 fewer dwelling units and therefore less population growth. Because the footprint would be smaller, impacts on hydrology, undiscovered cultural resources, and paleontological resources would be slightly reduced. Because there are fewer residential units, and therefore fewer residents, impacts related to population, such as demand for public services and utilities, would be less. Impacts on biological and cultural resources would be reduced because there would be fewer acres developed but impacts on the historic district could be increased because the preservation and interpretation under the proposed project would not occur under this alternative.

Feasibility

Implementation of the Minimal-Oak-Impact Alternative would result in approximately 30% fewer residential units, and larger proportion of high-density or multifamily units. This number and mix of housing may be more economically difficult to develop (e.g., infrastructure costs per residential unit would be higher than the proposed project).

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 Section 15126.6(e)(2) of the State CEQA Guidelines 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 4-2 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.

The No-Project Alternative would have substantially fewer residential units and therefore reduced population and traffic associated impacts, though the lack of services provided in the area would to some extent offset the benefits. Additionally, the acreage developed would be similar to the proposed project, and acreages of both wetlands and oak trees would be reduced; however, impacts on wildlife corridors would be increased because the area south of Deer Creek would be developed and though there would be fewer residences, it is likely that fences would function to cut off access for terrestrial species.

As shown in Table 4-2, the No-Project Alternative was determined to be environmentally superior; however, per CEQA Guidelines if the No-Project Alternative is the environmentally superior alternative then the EIR shall also identify an environmentally superior alternative among the other alternatives. Therefore, the Minimal-Oak-Impact Alternative is the environmentally superior alternative as it would reduce impacts for all resource areas to some extent. The Minimal-Oak-Impact Alternative would meet the main objective of creating development patterns that make the most efficient and feasible use of existing infrastructure and public services while promoting a sense of community as envisioned by the County General Plan. Other objectives that this alternative would attain include meeting future housing needs, broadening the El Dorado Hills and Cameron Park housing stock, improving connectivity, encouraging future transit opportunities, minimizing impacts on oak woodlands, preserving natural habitats and setting aside wildlife corridors, and protecting important cultural resources. The Minimal-Oak-Impact Alternative would result in the development of 541 fewer acres than the proposed project and the least development acreage of all the alternatives examined and therefore would result in reduced impacts on biological, paleontological, and, to some extent, cultural resources. Additionally, it would result in approximately one-third fewer dwelling units than the proposed project (though far more than the No-Project Alternative) and therefore fewer residents, resulting in reduced demands on services and fewer vehicles and therefore reduced air quality, and noise impacts.

Table 4-2. Comparison of Environmental Impacts of Alternatives to the Proposed Project

Resource Topic	Proposed Project	Alternative 1 – No Project		Alternative 2 – Reduced Wetland Impact		Alternative 3 – Reduced Development Footprint		Alternative 4 – Minimal Oak Impact	
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	SU	SU	(<)	SU	(<)	SU	(>)	SU	(<)
Combined Emissions	SU	SU	(<)	SU	(<)	SU	(>)	SU	(<)
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/Woodland	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	(<)
Geology, Soils, Minerals, and Paleontological Resources									
Geology	LTS w/mit	LTS w/mit	(=)	LTS w/mit	(<)	LTS w/mit	(=)	LTS w/mit	(<)
Mine Hazards	SU	SU	(=)	SU	(=)	SU	(=)	SU	(=)
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	(<)

Note: shading indicates change in significance level from proposed project.

NI = no impact.
LTS = less than significant impact.
LTS w/mit = less than significant impact with mitigation incorporated.
SU = significant and unavoidable impact.

(<) less than proposed project.
(=) equal to proposed project.
(>) greater than proposed project.

Resource Topic	Proposed Project	Alternative 1 – No Project		Alternative 2 – Reduced Wetland Impact		Alternative 3 – Reduced Development Footprint		Alternative 4 – Minimal Oak Impact	
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 w/mit	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(=)	LTS w/mit	(<)
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	(=)
Noise and Vibration									
Construction	SU	LTS w/mit	(<)	SU	(=)	SU	(=)	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	(<)	SU	(<)	SU	(>)	SU	(<)
Displacement	NI	NI	(=)	NI	(=)	NI	(=)	NI	(=)
Public Services and Utilities									
Public Services Facilities	LTS	LTS	(<)	LTS	(<)	LTS	(>)	LTS	(<)
Wastewater Treatment	LTS	LTS	(<)	LTS	(<)	LTS	(>)	LTS	(<)
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	LTS	(=)	LTS	(>)	LTS	(<)	LTS	(<)
Impacts from New Offsite Parks	NI	NI	(=)	NI	(=)	NI	(=)	NI	(=)
Transportation									
VMT Efficiency	LTS w/mit	LTS w/mit	(>)	LTS w/mit	(>)	LTS w/mit	(=)	LTS w/mit	(>)
Pedestrian/bicycle/public transit	LTS w/mit	LTS w/mit	(>)	LTS w/mit	(<)	LTS w/mit	(=)	LTS w/mit	(=)

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SU = significant and unavoidable impact.

(<) less than proposed project.
(=) equal to proposed project.
(>) greater than proposed project.

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, *Alternatives Development*, but were dismissed from evaluation for the reasons stated for each potential alternative.

4.5.1 Alternate Location Alternative

The Alternate 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, maximizing available infrastructure, and promoting El Dorado County's wine country. 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 and commercial 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. Additionally, Marble Valley Company, LLC does not own other undeveloped parcels in the area, other than Central El Dorado Hills and Serrano project areas. Additionally, development at the proposed site is part of the County's adopted general plan. For these reasons, an alternate location would not be consistent with the County General Plan and there is no alternative site available for development of this 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 Jobs-Housing Balance Alternative

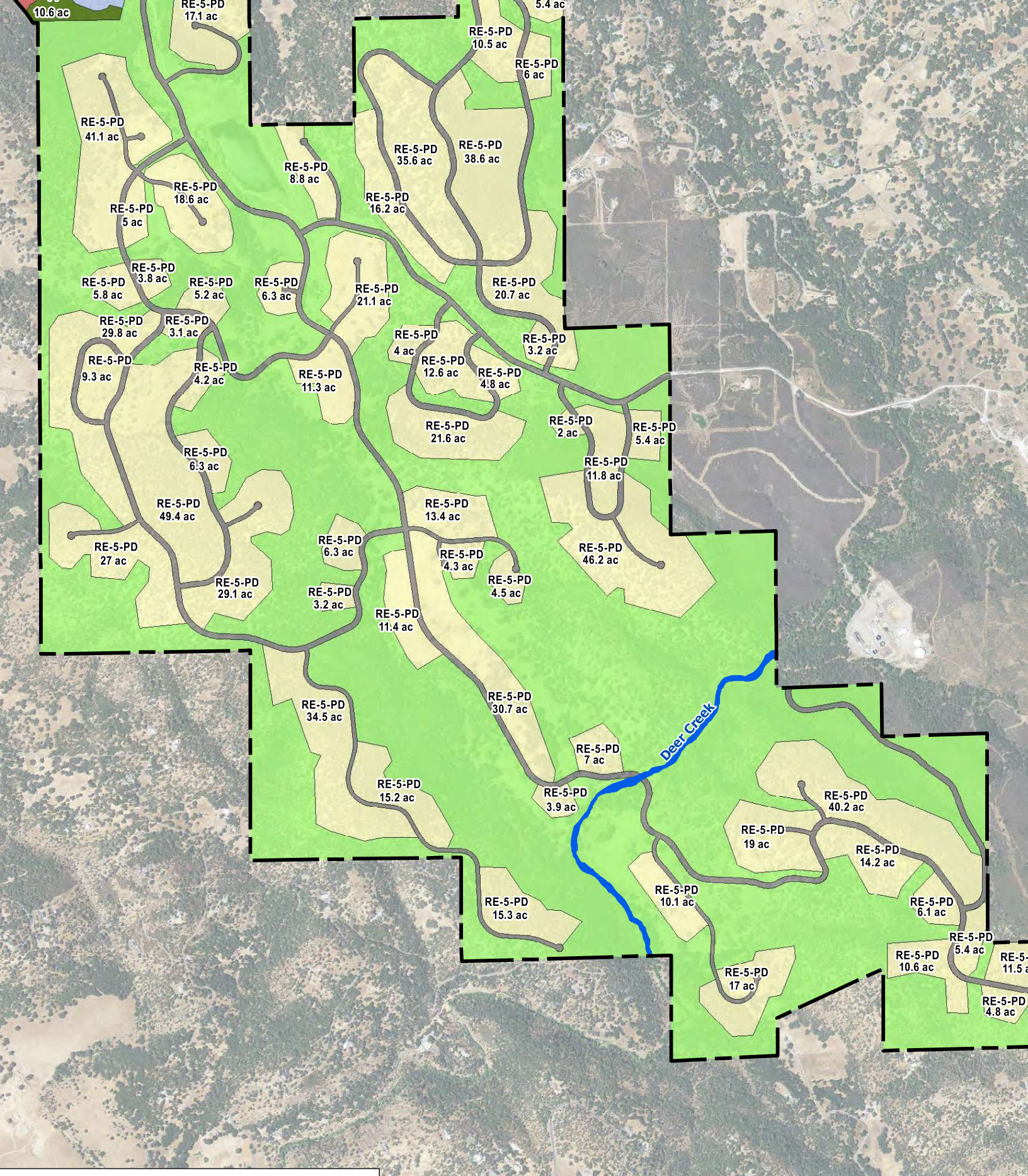
The Jobs-Housing Balance Alternative would consist of increased commercial development to provide more jobs in the immediate area in an effort to reduce traffic impacts by reducing the number of commuters. A balanced jobs-housing ratio is 1.5:1 according to the state General Plan guidelines. According to the adopted 2021-2029 Housing Element, the ratio of jobs to housing in El Dorado Hills is 0.9:1, the ratio in Cameron Park is 0.4:1, and Shingle Springs is 2.7:1 (El Dorado County 2021). It is not reasonable to expect the VMVSP to increase the ratio for either community, or to create 2,000 jobs, approximating an internal 1.5:1 jobs-housing ratio. However, this alternative would increase the commercial component of the project. This approach would reduce impacts related to traffic and air quality if the jobs created were filled by the residents of the Village of Marble Valley. However, there is no way to ensure that the residents would work in the area. It is likely that most people purchasing homes already have jobs and it is also likely that many of the jobs associated with the development would be filled by residents outside the development. Therefore, it is possible that this approach would not only not reduce traffic and air quality impacts, but may increase them, particularly if commercial development included retail enterprises that would attract customers. For these reasons, this alternative was removed from consideration.

4.5.3 Low-Density Residential—RE-10 Alternative

The project site would be zoned entirely for low-density residential development and zoned RE-10 (Estate Residential – 10 acre). This alternative would include buildout of approximately 180 single-family residences (average of 12-acre parcels) on 1,877 acres, as well as 350 acres of open space, an arts center, schools, parks, and streets. Septic systems would be installed, and electrical and telephone services would be above ground. Water would be supplied by individual wells. This alternative would reduce impacts associated with more population, such as traffic and air quality impacts. It would also reduce the impacts associated with offsite improvements. However, as a larger area could be developed, this alternative could block wildlife corridors to a greater extent. This alternative would not be consistent with the County's primary objective to make the most efficient and feasible use of existing infrastructure because it would insert development that does not use water and sewer services into the service area of the infrastructure provider (EID). Additionally, it would be inconsistent with the project applicant's stated objectives to increase housing diversity, to promote agri-tourism, to create a pedestrian-friendly and walkable community, to integrate commercial and retail needs, to preserve the site's natural features and commemorate the site's historic quarry operations. This alternative was removed from consideration because it does not meet the project objectives and would result in greater impacts on sensitive biological resources (wildlife corridors).

4.5.4 Low-Density Residential—RE-5 Alternative

The project site would be developed with residential parcels no less than 5 acres each. The project would include 291 single-family residences on approximately 1,877 acres, as well as 350 acres of open space, an arts center, schools, parks, and roads. Provision of most utilities would be identical to the proposed project, but septic systems would be installed, and electrical and telephone services would be above ground. By reducing the density and therefore the residents, this alternative would reduce impacts associated with increased population, such as traffic and air quality and GHG impacts. Though there would be fewer lots, there would be more area potentially disturbed with grading, clearing of vegetation, and fencing and therefore impacts on biological, resources could be increased. Because the lots are large and would be spread somewhat evenly over the project area, this alternative would have a greater impact on wildlife corridors, as more area could be fenced. This alternative would not be consistent with the County's primary objective to make the most efficient and feasible use of existing infrastructure because it would insert development that does not use water and sewer into the service area of the infrastructure provider (EID). Additionally, it would be inconsistent with the project applicant's stated objectives to increase housing diversity, to promote agri-tourism, to create a pedestrian-friendly and walkable community, and to integrate commercial and retail needs. This alternative was removed from consideration because it does not meet the project objectives and could result in greater impacts on sensitive biological resources (wildlife corridors).

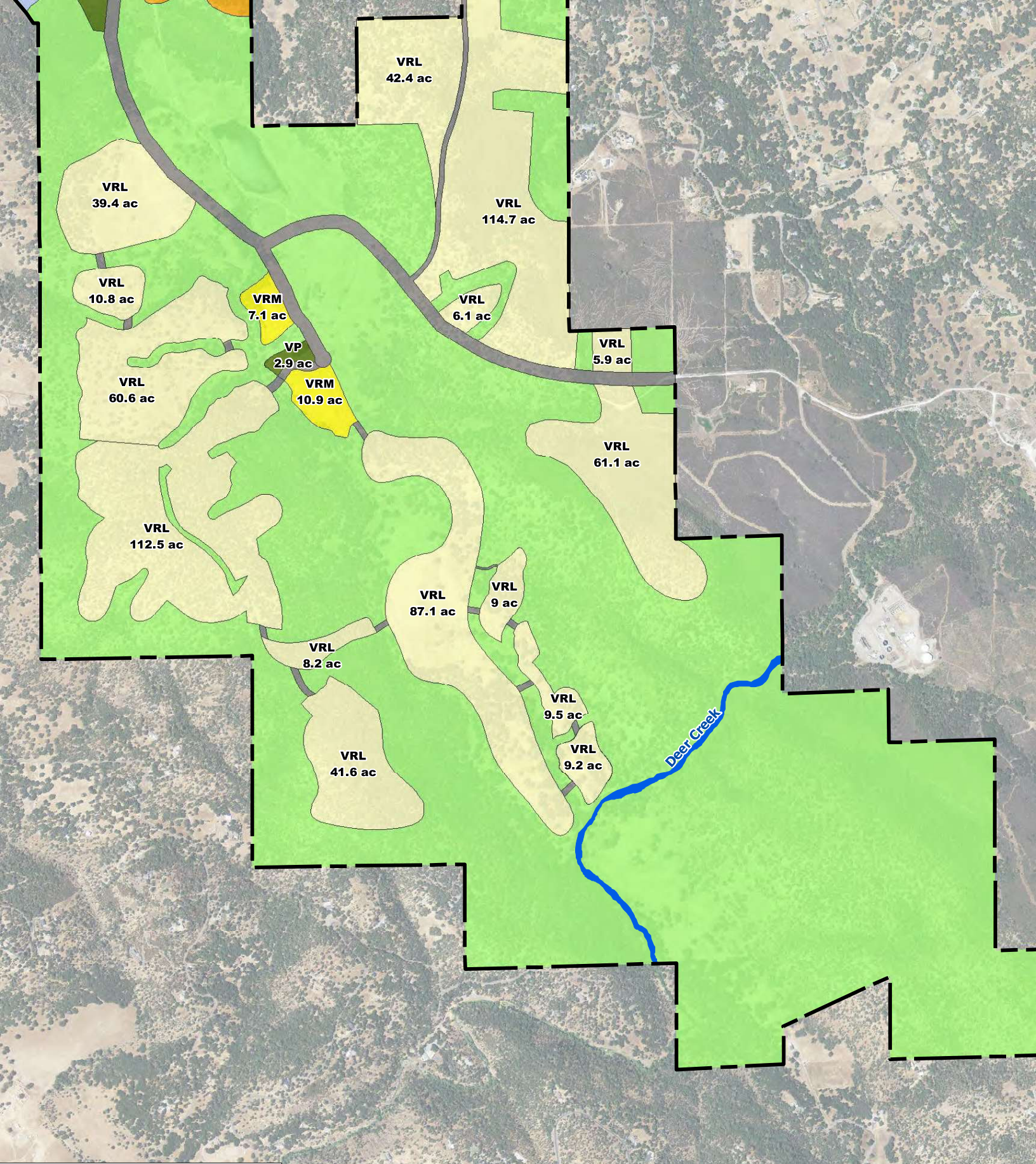


Features

Specific Plan Boundary

roject Alternative

5-PD Estate Residential, 5 acre minimum, planned development – 849.8 ac.



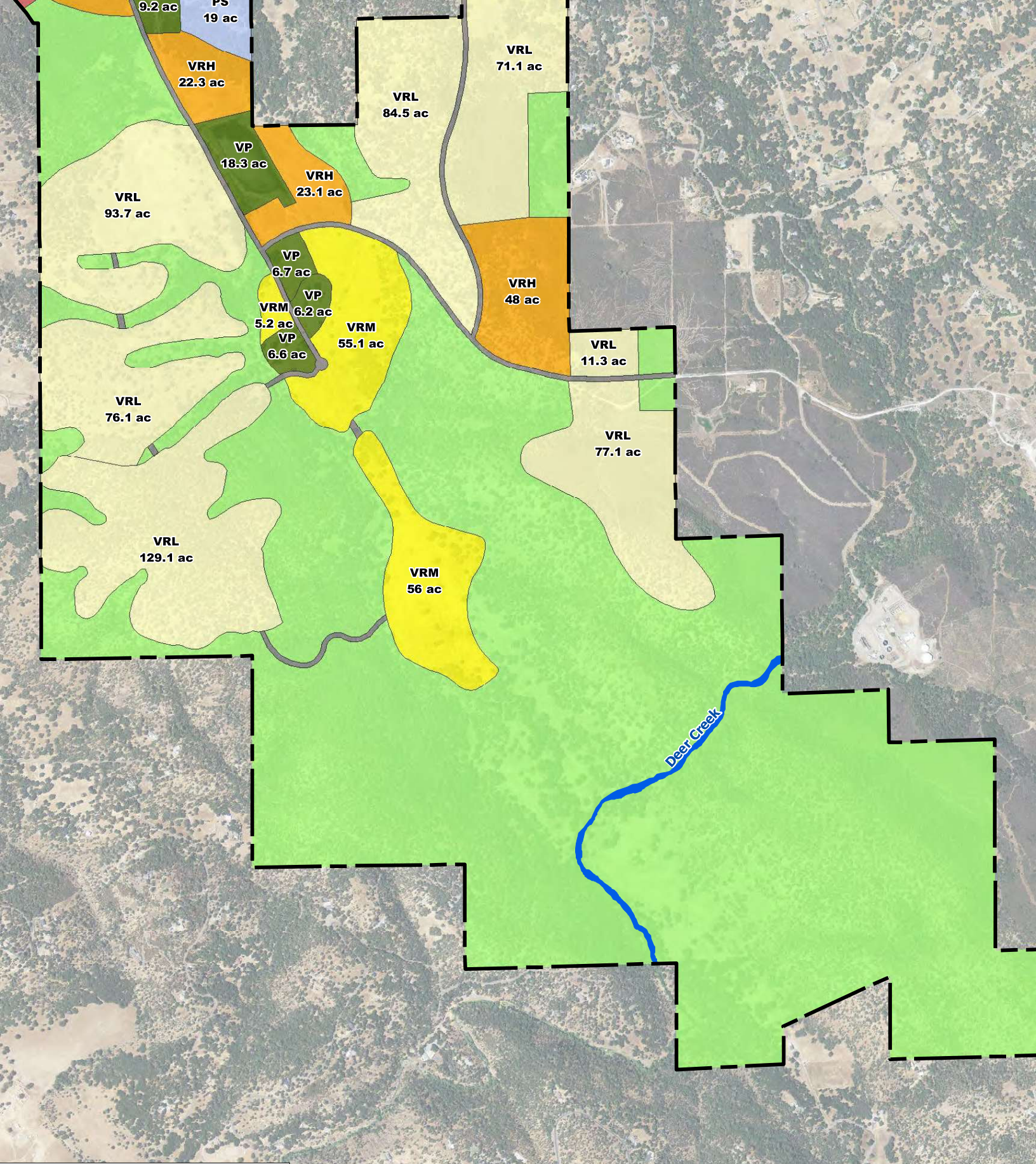
atures

Specific Plan Boundary

l Wetland Impact Alternative

Village Residential Low - 618.1 ac.

Village Residential Medium - 18.0 ac.



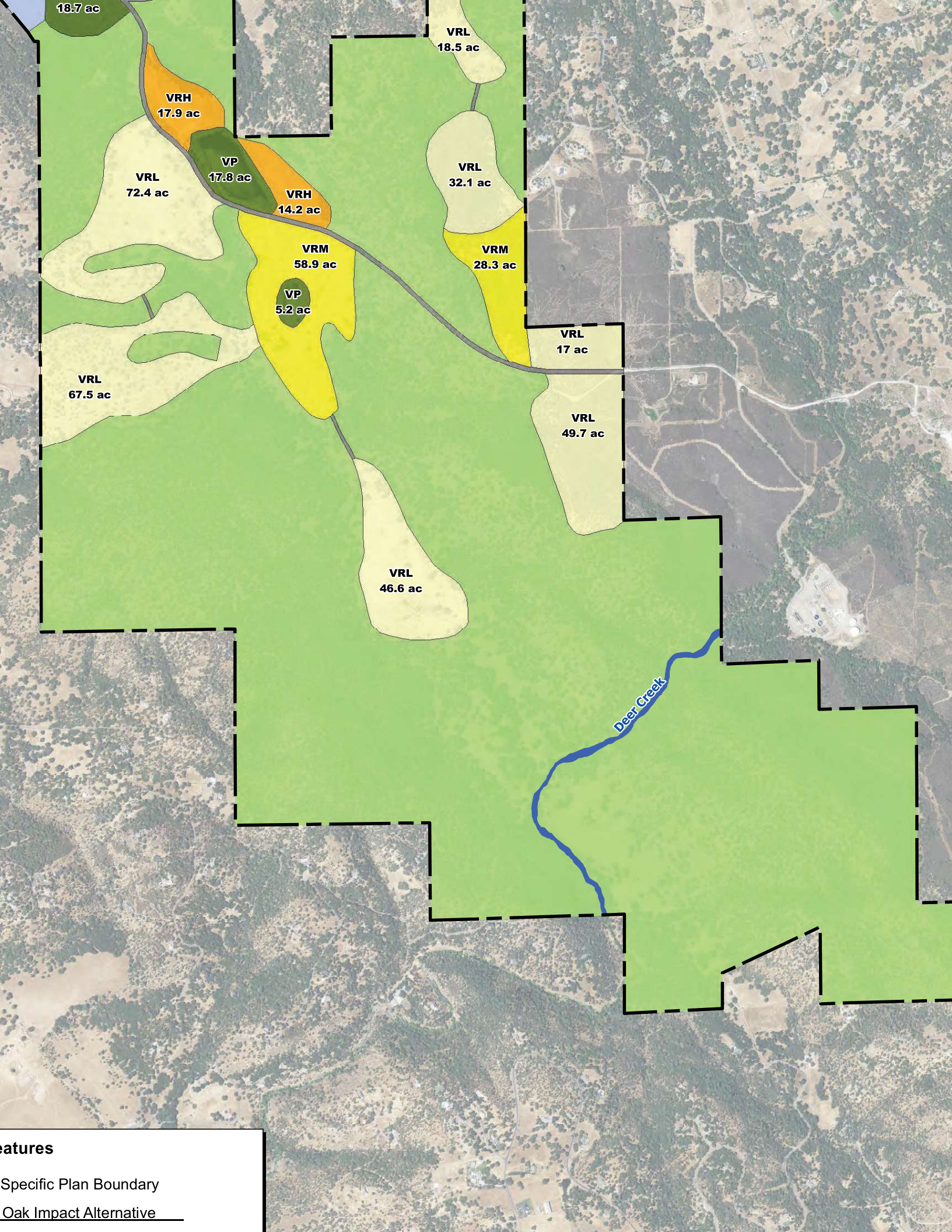
atures

Specific Plan Boundary

l Development Footprint Alternative

Village Residential Low - 543.1 ac.

Village Residential Medium - 116.2 ac.


18.7 ac
VRL
18.5 ac
VRH
17.9 ac
VP
17.8 ac
VRL
72.4 ac
VRH
14.2 ac
VRL
32.1 ac
VRM
58.9 ac
VRM
28.3 ac
VP
5.2 ac
VRL
17 ac
VRL
67.5 ac
VRL
49.7 ac
VRL
46.6 ac
Deer Creek
eatures
Specific Plan Boundary
Oak Impact Alternative