6. Alternatives Analysis

6. ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; a reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

6.2 PURPOSE OF ALTERNATIVES

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> [...]capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Section 15126.6(f) of CEQA Guidelines further states:

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if

these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination […] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

Based on the above, reasonable alternatives to the project must be capable of feasibly attaining most of the basic objectives of the project. The proposed project is being pursued with the following objectives:

1. Create a high-quality mixed-use development that combines commercial and residential facilities in a single project that is consistent with and fulfills many of the goals, objectives, and policies of the El Dorado County General Plan.
2. Emphasize the preservation of open space, existing oak woodland resources, natural topography, intermittent streams, and drainages consistent with the policies of the Bass Lake Hills Specific Plan.
3. Provide on-site public hiking, biking, and equestrian trails complimentary to and connecting the existing and future trail systems within the Bass Lake Hills Specific Plan area.
4. Preserve and protect the remnants and alignment of the historic Lincoln Highway and acknowledge and promote the history of the 1800's Old Wagon trail "The Clarksville Toll Road" as a Class 1 bike path and modern roadway.
5. Provide the opportunity for the development of a range of housing types and densities in proximity to US 50 and other transportation corridors in the area.

6. Develop a mixed-use project that reduces traffic impacts and vehicles miles traveled through the provision of on-site workforce housing for those employed in the proposed project.
7. Provide four and five-star rated lodging and reception facilities, together with related commercial retail uses and restaurants to serve the existing community neighborhoods and the touring public, thereby creating a distinctive destination resort.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. The significance levels of impacts identified in the EIR are presented below.

Less Than Significant or No Impact

As discussed within each respective section of this EIR, the proposed project would result in no impact, a less-than-significant impact, or a less than cumulatively considerable contribution to a significant cumulative impact related to the following topics associated with the resource areas indicated, and mitigation would not be required:

- ***Aesthetics***
  - Have a substantial adverse effect on a scenic vista.
  - Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
  - Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

- ***Agricultural and Forestry Resources***
  - Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
  - Conflict with existing zoning for agricultural use, or a Williamson Act contract.
  - Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
  - Result in the loss of forest land or conversion of forest land to non-forest use.
  - Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

- ***Air Quality, Greenhouse Gas Emissions, and Energy***
  - Conflict with or obstruct implementation of the applicable air quality plan during project construction.
  - Result in other emissions (such as those leading to odor) adversely affecting a substantial number of people.
  - Result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency.

  - Result in a cumulatively considerable inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency.

- ***Biological Resources***
  - Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
  - Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

- ***Cultural and Tribal Cultural Resources***
  - Cause a cumulative loss of cultural resources.

- ***Geology and Soils***
  - Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction, and landslides.
  - Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.
  - Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
  - Cumulative increase in the potential for geological related impacts and hazards.

- ***Hazards and Hazardous Materials***
  - Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
  - Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
  - For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
  - Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
  - Cumulative exposure to potential hazards and increases in the transport, storage, and use of hazardous materials.

- ***Hydrology and Water Quality***
  - Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.
  - Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- Cumulative impacts related to the violation of water quality standards or waste discharge requirements, and impacts resulting from the alteration of existing drainage patterns.

- ***Land Use and Planning/Population and Housing***
  - Physically divide an established community.
  - Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
  - Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure).
  - Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.
  - Cause a significant cumulative environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
  - Cumulative substantial unplanned population growth.

- ***Mineral Resources***
  - Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
  - Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

- ***Noise***
  - 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 local general plan or noise ordinance, or applicable standards of other agencies.
  - Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
  - For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.
  - Generation of a substantial permanent increase in ambient noise levels associated with the proposed project in combination with cumulative development.

- ***Public Services and Recreation***
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain

acceptable service ratios, response times, or other performance objectives for sheriff protection services.
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for schools.
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for parks; increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for other public facilities.
  - Cumulative impacts to public services.

- ***Transportation***
  - Conflict with a program, plan, ordinance, or policy, except LOS, addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, during operations.
  - Substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
  - Result in inadequate emergency access.

- ***Tribal Cultural Resources***
  - Cause a cumulative loss of tribal cultural resources.

- ***Utilities and Service Systems***
  - Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
  - Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single dry, and multiple dry years.
  - Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
  - Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.

  - Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the El Dorado County General Plan.

- ***Wildfire***
  - Substantially impair an adopted emergency response plan or emergency evacuation plan.
  - Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
  - 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.
  - Increase in wildfire risk attributable to the proposed project, in combination with cumulative development.

Less Than Significant with Mitigation

Environmental impacts (including cumulative impacts) of the proposed project that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

- ***Air Quality, Greenhouse Gas Emissions, and Energy.*** The EIR determined that implementation of the proposed project could expose sensitive receptors to substantial pollutant concentrations. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

- ***Biological Resources.*** The EIR determined that implementation of the proposed project could result in potential adverse effects to special-status plants, Crotch's bumble bee, vernal pool fairy shrimp, monarch butterfly, foothill yellow-legged frog (FYLF), northwestern pond turtle, nesting birds and raptors, roosting bats, and Northern California ringtail either directly (e.g., cause a wildlife population to drop below self-sustaining levels, threaten to eliminate an animal community) or through substantial habitat modifications. In addition, the project could result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities, or have a substantial adverse effect on federal or State protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Given that the proposed project would involve the removal of trees, the project could conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance. The EIR requires mitigation in order to ensure that all of the aforementioned impacts related to biological resources would be reduced to less-than-significant levels.

- ***Cultural Resources.*** The EIR determined that implementation of the proposed project could cause a substantial adverse change in the significance of a unique archaeological resource or disturb human remains, including those interred outside of dedicated cemeteries. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources would be less than significant.

- ***Geology and Soils.*** The EIR determined that implementation of the proposed project could result in substantial soil erosion or the loss of topsoil, as well as impacts related to being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Hazards and Hazardous Materials.*** The EIR determined that the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

- ***Hydrology and Water Quality.*** The EIR determined that implementation of the proposed project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface water or ground water quality during construction and/or operations. In addition, the EIR determined that the proposed project could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. However, the EIR requires mitigation in order to ensure that impacts related to hydrology and water quality are reduced to less-than-significant levels.

- ***Noise.*** The EIR determined that implementation of the proposed project could result in the generation of a substantial permanent increase in ambient noise levels associated with the Project Development Area in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. However, the EIR requires mitigation in order to ensure that the foregoing impact related to noise is reduced to a less-than-significant level.

- ***Transportation.*** The EIR determined that implementation of the proposed project could conflict with a program, plan, ordinance, or policy, except level of service (LOS), addressing the circulation system during construction activities. However, the EIR requires mitigation in order to ensure that the foregoing impact related to transportation is reduced to a less-than-significant level.

- ***Tribal Cultural Resources.*** The EIR determined that implementation of the proposed project could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074. However, the EIR requires mitigation in order to ensure that the foregoing impact related to tribal cultural resources is reduced to a less-than-significant level.

- ***Wildfire.*** The EIR determined that implementation of the project could result in a significant impact related to exacerbating wildfire risks due to slope, prevailing winds, and other factors, and thereby exposing project occupants to, pollutant concentrations from a

wildfire or the uncontrolled spread of a wildfire. However, the EIR requires mitigation to ensure that the aforementioned impact is reduced to a less-than-significant level.

Significant and Unavoidable

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

- ***Aesthetics.*** The EIR determined that the proposed project would result in a significant and unavoidable impact related to substantially degrading the existing visual character or quality of public views of the site and its surroundings. In addition, the proposed project's contribution to the long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the project area was determined to be significant and unavoidable.

- ***Air Quality, Greenhouse Gas Emissions, and Energy.*** The EIR determined that the proposed project would result in a significant and unavoidable impact related to conflicting with or obstructing implementation of the applicable air quality plan during project operation. The EIR also determined that the proposed project would result in a cumulatively considerable and significant and unavoidable impact related to resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) and a cumulatively considerable and significant and unavoidable impact related to the generation of greenhouse gas emissions (GHGs) that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

- ***Biological Resources.*** The EIR determined that the proposed project would result in a significant and unavoidable impact related to the cumulative loss of habitat for special-status species and oak woodlands.

- ***Cultural Resources.*** The EIR determined that the proposed project would result in a significant and unavoidable impact related to causing a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

- ***Noise.*** The EIR determined that the proposed project could result in a significant and unavoidable impact related to the generation of a substantial permanent increase in ambient noise levels associated with Project Buildout in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

- ***Transportation.*** The EIR determined that the proposed project would result in a significant and unavoidable impact related to a conflict with CEQA Guidelines section 15064.3, subdivision (b), which is related to vehicle miles traveled (VMT). In addition, the EIR determined that the proposed project would cumulatively conflict with CEQA Guidelines section 15064.3, subdivision (b).

6.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is

to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to "set forth only those alternatives necessary to permit a reasoned choice." As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for "a range of reasonable alternatives" and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

Alternatives Considered But Dismissed From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant project impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

(i) failure to meet most of the basic project objectives,
(ii) infeasibility, or
(iii) inability to avoid significant environmental impacts.

Regarding item (ii), infeasibility, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

The off-site alternative was considered but dismissed from detailed analysis in this EIR. The reason(s) for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

Off-Site Alternative

As noted previously, the purpose of an alternatives analysis is to develop alternatives to the proposed project that are feasible and able to substantially lessen or avoid at least one of the significant environmental effects identified as a result of the project, while still meeting most, if not all, of the basic project objectives. Based on a review of satellite imagery of the region, and a review of approved/pending projects in the western El Dorado County region, there are limited 60-acre properties that are well-suited for the proposed project. Within the Bass Lake Hills Specific Plan (BLHSP) boundaries, several recent tentative subdivision maps have been approved north of the project site, including Bell Ranch, Bell Woods, Hollow Oak, Bass Lake North, and Hawk View. The remaining area of the BLHSP, where tentative subdivision maps have not yet been approved, consists primarily of the southern and central areas of the Plan. These areas contain conditions and habitats similar to the project site, including, but not limited to, grasslands, scattered oak woodlands, and in some cases, aquatic resources such as Carson Creek and intermittent drainages (see BLHSP, Figure 1-5). Thus, it is reasonable to conclude that placing the proposed project on another 60-acre property within the BLHSP would not avoid or substantially lessen any of the significant impacts identified for the proposed project.

Remaining large land areas outside of the BLHSP that have yet to be developed with residential and/or commercial uses are generally located within entitled projects or projects being actively processed by the County, including the Promontory Specific Plan, El Dorado Hills Specific Plan, Village of Marble Valley Specific Plan (VMVSP), Lime Rock Valley Specific Plan (LRVSP), and the Carson Creek Specific Plan. As identified in the project objectives above, the basic objectives of the proposed project are to create a high-quality mixed-use development that combines commercial and residential facilities in a single project that is consistent with the El Dorado County General Plan and to provide on-site public hiking, biking, and equestrian trails complimentary to and connecting the existing and future trail systems within the BLHSP area. While adequately sized land areas are available outside of the BLHSP boundary that could accommodate the proposed project, development outside of the BLHSP boundary would be inconsistent with some of the basic project objectives and either located within the boundaries of an entitled/pending project and/or on a property that would not result in substantially lessening or avoidance of significant project impacts. Thus, an Off-Site Alternative was dismissed from detailed analysis within this EIR.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- Buildout Pursuant to BLHSP Alternative; and
- Higher Density Alternative.

Each of the project alternatives is described in detail below, with a corresponding analysis of each alternative's anticipated impacts in comparison to the proposed project. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6(d), which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed project. When

comparing the potential impacts resulting from implementation of the foregoing alternatives, the following terminology is used:

- "Fewer" = Less than Proposed Project;
- "Similar" = Similar to Proposed Project; and
- "Greater" = Greater than Proposed Project.

When the term "fewer" is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term "fewer" may mean the actual elimination of an impact identified for the proposed project altogether. Similarly, use of the term "greater" does not necessarily imply that an alternative would require additional mitigation beyond what has been required for the proposed project. To the extent possible, this analysis will distinguish between the two implications of the comparative words "fewer" and "greater".

See Table 6-2 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

No Project (No Build) Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

> "… discuss […] existing conditions […] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (*Id.*, subd. [e][2]) "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property's existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build,' wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (*Id.*, subd. [e][3][B]).

The County has decided to evaluate a No Project (No Build) Alternative, which assumes that the current conditions of the project site would remain, and the site would not be developed. As described in this EIR, Country Club Drive crosses through the northern portion of the site and a dirt road is located in the western area of the site. With the exception of two wells located near the center of the site, the project site is otherwise undeveloped. On-site vegetation consists of seasonal grasses and scattered oak trees. In addition, rock outcroppings are located throughout the site. Seasonal wetlands have also been observed on-site, as well as roadside ditches and an intermittent drainage north of Country Club Drive. The No Project (No Build) Alternative would not meet any of the project objectives.

Aesthetics

The EIR determined that the proposed project would result in a significant and unavoidable impact related to substantially degrading the existing visual character or quality of public views of the site and its surroundings. The No Project (No Build) Alternative would consist of the continuation of the existing conditions of the project site. Because the No Project (No Build) Alternative would not introduce any new structures or buildings on the site, the Alternative would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the creation of new sources of light or glare would not occur. Thus, significant impacts related to Aesthetics would not occur under the No Project (No Build) Alternative.

Air Quality, Greenhouse Gas Emissions, and Energy

Because the No Project (No Build) Alternative would not involve development of the project site, operational activities would not occur under the alternative. Therefore, the Alternative would not result in operational emissions, and would not generate reactive organic gas (ROG) or nitrogen oxides (NO_X) emissions in exceedance of the El Dorado County Air Quality Management District's (EDCAQMD's) significance thresholds. Thus, the significant and unavoidable impact identified for the full project buildout related to air quality would not occur under the No Project (No Build) Alternative, and Mitigation Measures 4.2-2(a) and (b) would not be required. In addition, the No Project (No Build) Alternative would not expose sensitive receptors to substantial pollutant concentrations, and Mitigation Measure 4.2-3 would not be required. Furthermore, the cumulatively considerable and significant and unavoidable impacts related to criteria pollutants and the generation of GHG emissions would not occur under the No Project (No Build) Alternative. Overall, significant impacts related to Air Quality and GHG emissions would not occur under the No Project (No Build) Alternative.

Biological Resources

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. As such, the Alternative would not have the potential to significantly impact special-status plants, Crotch's bumble bee, vernal pool fairy shrimp, monarch butterfly, FYLF, northwestern pond turtle, nesting birds and raptors, roosting bats, or Northern California ringtail. In addition, the No Project (No Build) Alternative would not result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities, or have a substantial adverse effect on federal or State protected aquatic resources. The Alternative would not include removal of trees and, thus, would not conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance. In addition, the cumulatively considerable and significant and unavoidable impact related to the cumulative loss of habitat for special-status species and oak woodlands would not occur under the No Project (No Build) Alternative. As such, none of the mitigation measures related to biological resources required for the proposed project would be required under the Alternative. Overall, the significant impacts identified for the proposed project related to Biological Resources would not occur under the No Project (No Build) Alternative.

Cultural Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, the Alternative would not have the potential to result in significant impacts to Cultural Resources. Mitigation Measures 4.4-1(a) through 4.4-1(d), 4.4-2(a) through 4.4-2(c), and 4.4-3 would not be required. In addition, the significant and unavoidable impact related to causing a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 would not occur under the No Project (No Build) Alternative. Overall, the significant

impacts identified for the proposed project related to Cultural Resources would not occur under the No Project (No Build) Alternative.

Geology and Soils

Because the No Project (No Build) Alternative would not include grading or other ground-disturbing activities, substantial soil erosion or loss of topsoil would not occur, and the Alternative would not result in impacts related to placing structures on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code. Thus, Mitigation Measures 4.5-2 and 4.5-3 would not be required. Overall, significant impacts related to Geology and Soils would not occur under the No Project (No Build) Alternative.

Hazards and Hazardous Materials

Because the current conditions of the project site would remain under the No Project (No Build) Alternative, the Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the wells located within the Program Study Area of the site, as well as the unknown potential environmental conditions of the proposed off-site improvement areas. As such, Mitigation Measures 4.6-2(a) through 4.6-2(c) would not be required. Overall, significant impacts related to Hazards and Hazardous Materials would not occur under the No Project (No Build) Alternative.

Hydrology and Water Quality

The No Project (No Build) Alternative would not include any ground disturbance or otherwise alter existing site conditions and, thus, would not have the potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or ground water quality during construction and/or operation. Thus, Mitigation Measures 4.7-1 and 4.7-2(a) through 4.7-2(e) would not be required. In addition, because the No Project (No Build) Alternative would not include any alterations to the project site, the Alternative would not have the potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, Mitigation Measures 4.7-4(a) and 4.7-4(b) would not be required. Overall, significant impacts related to Hydrology and Water Quality would not occur under the No Project (No Build) Alternative.

Noise

The No Project (No Build) Alternative would not introduce any new land uses to the project site, and thus, would not have the potential to result in the generation of a substantial permanent increase in ambient noise levels associated with the Project Development Area in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. As such, Mitigation Measures 4.9-2(a) and 4.9-2(b) would not be required. In addition, under the No Project (No Build) Alternative, the potential significant and unavoidable impact related to the generation of a substantial permanent increase in ambient noise levels associated with Project Buildout in excess of standards established in the local general plan or

noise ordinance, associated with the proposed project would not occur, and Mitigation Measure 4.9-3 would not be required.

Transportation

The No Project (No Build) Alternative would not include construction activities that could result in a conflict with a program, plan, ordinance, or policy, except level of service (LOS), addressing the circulation system; thus, Mitigation Measure 4.11-1 would not be required. In addition, because development of new residential development would not occur under the No Project (No Build) Alternative, the Alternative would not result in a significant and unavoidable impact related to a conflict with CEQA Guidelines section 15064.3, subdivision (b), or cumulatively conflict with CEQA Guidelines section 15064.3, subdivision (b). Thus, the Alternative would not result in any impacts related to VMT, and Mitigation Measure 4.11-3 would not be required. Overall, significant impacts related to Transportation would not occur under the No Project (No Build) Alternative.

Tribal Cultural Resources

Because land disturbance would not occur under the No Project (No Build) Alternative, the Alternative would not have the potential to result in significant impacts to Tribal Cultural Resources. As such, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(e) would not be required. Overall, the significant impacts identified for the proposed project related to Tribal Cultural Resources would not occur under the No Project (No Build) Alternative.

Wildfire

New habitable structures would not be constructed on-site under the No Project (No Build) Alternative. Because the Alternative would not involve construction activities and would not be developed with urban uses, equipment without appropriate spark arrestors that could result in direct flame impingement on combustible materials, such as existing on-site vegetation or building construction supplies, would not be used on-site. As a result, the Alternative would not have the potential to exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, Mitigation Measure 4.14-2 would not be required. Overall, the significant impact identified for the proposed project related to Wildfire would not occur under the No Project (No Build) Alternative.

Buildout Pursuant to BLHSP Alternative

Under the Buildout Pursuant to BLHSP Alternative, the entire 60.5-acre project site would be developed consistent with the site's existing BLHSP land use designations. As shown in Figure 3-4 in Chapter 3, Project Description, of this EIR, the BLHSP designates the approximately 43.12-acre portion of the project site located south of Country Club Drive as Low Density Residential Planned Development with a maximum allowable density of 0.2 dwelling units per acre (du/ac) (L.2-PD); the approximately 17.38-acre portion of the project site located north of Country Club Drive is designated as Low Density Residential Planned Development with a maximum allowable density of 0.7 du/ac (L.7-PD).

Assuming buildout at the maximum allowable density for the foregoing land use designations, the southern portion of the project site designated as L.2-PD could be developed with nine low density residences, and the northern portion of the project site designated as L.7-PD could be developed with 12 low density residences, for a total of 21 residences across the entire project site. The currently proposed hotel and retail uses would not be developed under the Buildout Pursuant to BLHSP Alternative. When taking into account full buildout of the proposed project, which could

include the development of up to 814 residences, the Alternative would result in the development of 793 fewer residences than the proposed project.

Similar to the proposed project, it is assumed that the Buildout Pursuant to BLHSP Alternative would connect to public water, and thus, would require annexation into the El Dorado Irrigation District (EID) service area, which is subject to El Dorado Local Agency Formation Commission (LAFCo) approval. Unlike the currently proposed project, the proposed off-site sewer pipe connection would not be required under the Alternative; rather a septic sewer system would be sufficient to serve the needs of the reduced population associated with the Buildout Pursuant to BLHSP Alternative. The General Plan Amendment, BLHSP Amendment, and Rezone associated with the proposed project would not be required under the Buildout Pursuant to BLHSP Alternative.

A site plan has not been prepared for the Buildout Pursuant to BLHSP Alternative; thus, the extent to which the Alternative would incorporate existing on-site natural resources, provide trails on-site, or preserve the Lincoln Highway cannot be conclusively determined. However, because on-site ground disturbance would be limited to grading of house foundations and internal roads, and excavation of utility trenches, it is reasonable to assume that the Alternative could be designed with an emphasis on preserving and incorporating these features. Therefore, it is anticipated that the Alternative could meet Project Objectives 2 through 4. Because the Buildout Pursuant to BLHSP Alternative would include the development of only residential uses with generally uniform density, the Alternative would not meet the project objectives 1, 6, and 7. This Alternative would also not meet project objective 5 (Provide the opportunity for the development of a range of housing types and densities in proximity to U.S. Highway 50 (US 50) and other transportation corridors in the area), due to the low residential density under this Alternative.

Aesthetics

The Buildout Pursuant to BLHSP Alternative would convert the currently undeveloped project site to urban uses. While the Alternative would result in the development of approximately 793 fewer residential units than the proposed project, the Alternative would include residential development, as well as an off-site water main connection and the development of an on-site septic system, similar to the proposed project. Given that the project site is predominantly undeveloped and affords views of the surrounding natural landscape, comprised primarily of grassy hills, the existing visual character of the site would be significantly altered under the Buildout Pursuant to BLHSP Alternative. Therefore, similar to the proposed project, the Alternative would substantially degrade the existing visual character or quality of public views of the site and its surroundings, and Mitigation Measure 4.1-3, which requires the preparation and implementation of a final landscape plan, would still be required. However, the Buildout Pursuant to BLHSP Alternative would include the development of fewer residential units spread over a much larger area as compared to the proposed project. Because the 21 low-density residential units would be spread out over 60.5 acres, a large portion of the project site consisting of the intervening areas between residences would not be subject to substantial urban development and would remain similar to existing conditions. The Buildout Pursuant to BLHSP Alternative also would not include the development of five-story hotels, which would be more visually intrusive than the low-density residences included in the Buildout Pursuant to BLHSP Alternative. As such, the Alternative would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and unlike the proposed project, a less-than-significant impact would occur. Therefore, the significant and unavoidable impact related to Aesthetics identified for the proposed project would not occur under the Buildout Pursuant to BLHSP Alternative. Overall, impacts

related to Aesthetics would be fewer under the Buildout Pursuant to BLHSP Alternative as compared to the proposed project.

Air Quality, Greenhouse Gas Emissions, and Energy

The Buildout Pursuant to BLHSP Alternative would include the development of 793 fewer residential units than the proposed project, and thus, the disturbance footprint would be substantially reduced because only the home foundations and roads would require grading, rather than the entire project site. As such, the Alternative's potential to expose sensitive receptors to naturally occurring asbestos (NOA) during construction would be reduced as compared to the proposed project. Nonetheless, because disturbance of on-site soils involves the potential to encounter NOA, similar mitigation to Mitigation Measure 4.2-3, which requires geologic evaluations of the project site to determine the presence or absence of NOA, as well as the preparation of an Asbestos Dust Mitigation Plan if NOA should be discovered, would still be required.

The significant decrease in residential units associated with the Buildout Pursuant to BLHSP Alternative would result in an associated decrease in traffic, as well as fewer mobile and stationary emission sources. Thus, operation of the Buildout Pursuant to BLHSP Alternative would result in a smaller contribution of pollutant emissions than the proposed project. Due to the small scale of the development associated with the Buildout Pursuant to BLHSP Alternative, the Alternative is unlikely to exceed the EDCAQMD's thresholds of significance, would not conflict with the EDCAQMD's adopted attainment plans, and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard. Therefore, Mitigation Measures 4.2-2(a), 4.2-2(b), and 4.2-6, which require ROG emissions to be quantified and reduction measures to be identified, would not be required, and the significant and unavoidable impact related to air quality would not occur under the Buildout Pursuant to BLHSP Alternative. In addition, as discussed below, the Buildout Pursuant to BLHSP Alternative would result in a reduction of VMT as compared to the proposed project. Thus, the cumulatively considerable and significant and unavoidable impact related to the generation of GHGs that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs would not occur under the Buildout Pursuant to BLHSP Alternative. Overall, impacts related to Air Quality, GHG Emissions, and Energy under the Buildout Pursuant to BLHSP Alternative would be fewer as compared to the proposed project.

Biological Resources

Similar to the proposed project, the Buildout Pursuant to BLHSP Alternative would include ground-disturbing activities on the project site. Thus, the Alternative would have the potential to impact special-status plants, Crotch's bumble bee, vernal pool fairy shrimp, monarch butterfly, northwestern pond turtle, nesting birds and raptors, and roosting bats either directly (e.g., cause a wildlife population to drop below self-sustaining levels, threaten to eliminate an animal community) or through substantial habitat modifications. As such, Mitigation Measures 4.3-1, 4.3-2, 4.3-3, 4.3-4, 4.3-6, 4.3-7, and 4.3-8, which require species-specific pre-construction surveys to be conducted, would still be required. However, because the Buildout Pursuant to BLHSP Alternative would include a smaller disturbance footprint than the proposed project, potential impacts to special-status plants and wildlife would be reduced as compared to the proposed project. In addition, because the Alternative would not include the development of an off-site sewer line, potential impacts to FYLF and Northern California ringtail would not occur, and Mitigation Measures 4.3-5 and 4.3-9 would not be required.

Because the Buildout Pursuant to BLHSP Alternative would not include the development of an off-site sewer line, impacts to arroyo willow riparian scrub would not occur, and the Alternative would not result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities. Therefore, Mitigation Measure 4.3-10, which requires the project proponent to implement minimization and avoidance measures to minimize or compensate for impacts to riparian habitat, would not be required.

Although the exclusion of the off-site sewer improvement would result in the avoidance of some aquatic resources, because the Buildout Pursuant to BLHSP Alternative would still include development of the project site, as well as an off-site water main connection, the Alternative could have a substantial adverse effect on federal or State protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and Mitigation Measures 4.3-11(a) through 4.3-11(d), which require the project proponent to obtain applicable permits for disturbance of aquatic resources, would still be required. However, because the Buildout Pursuant to BLHSP Alternative would include a reduced disturbance footprint as compared to the proposed project, development of the Alternative could be designed to avoid disturbance of on-site aquatic resources; thus, potential impacts related to such would be reduced as compared to the proposed project.

The exclusion of the off-site sewer improvement would result in the avoidance of approximately two acres of oak woodland under the Buildout Pursuant to BLHSP Alternative. In addition, the Buildout Pursuant to BLHSP Alternative could be designed to avoid all on-site oak woodland. Therefore, the Alternative would not conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance, and Mitigation Measure 4.3-13, which requires mitigation for oak woodlands and individual oak trees impacted by project development, would not be required.

As the Buildout Pursuant to BLHSP Alternative would result in the conversion of a smaller amount of existing on- and off-site habitat to urban uses, other proposed and approved projects in the BLHSP area and El Dorado County would still result in a significant cumulative impact. However, the Alternative's contribution to the significant impact would be less than cumulatively considerable, as the Alternative would substantially reduce potential impacts to wildlife habitat and could completely avoid oak woodlands. Thus, the cumulatively considerable and significant and unavoidable impact identified for the proposed project related to the cumulative loss of habitat for special-status species and oak woodlands would not occur under the Buildout Pursuant to BLHSP Alternative. Mitigation similar to Mitigation Measure 4.3-14 would still be required.

Overall, impacts to Biological Resources would be fewer under the Buildout Pursuant to BLHSP Alternative as compared to the proposed project.

Cultural Resources

While the Buildout Pursuant to BLHSP Alternative would result in the development of 793 fewer residential units than the proposed project, the Alternative would still result in the disturbance of the project site. However, the Buildout Pursuant to BLHSP Alternative would include a smaller disturbance footprint than the proposed project. As such, the Alternative's potential to cause a substantial adverse change in the significance of a unique archaeological resource or disturb human remains, including those interred outside of dedicated cemeteries, would be reduced as compared to the proposed project. Nonetheless, because ground disturbance would still occur under the Alternative, Mitigation Measures 4.4-2(a) through 4.4-2(c) and 4.4-3, which require

appropriate measures should cultural resources be discovered on-site, would still be required. Because the Buildout Pursuant to BLHSP Alternative would include a reduced disturbance footprint as compared to the proposed project, development of the Alternative could be designed to avoid encroaching upon the on-site portions of the Sacramento-Placerville Road, Mormon Hill Road-Lincoln Highway. Therefore, Mitigation Measures 4.4-1(a) and 4.4-1(b), which require the identification of on-site cultural resources and minimization of potential impacts, would not be required, and the significant and unavoidable impact related to the foregoing cultural resource would not occur under the Alternative. In addition, because the Buildout Pursuant to BLHSP Alternative would not include any off-site sewer improvements, potential impacts to the Old Bass Lake Road (Lincoln Highway) would not occur, and Mitigation Measures 4.4-1(c) and 4.4-1(d) would not be required. Overall, potential impacts related to Cultural Resources under the Buildout Pursuant to BLHSP Alternative would be fewer as compared to the proposed project.

Geology and Soils

As noted above, in addition to excluding the off-site sewer improvement, the Buildout Pursuant to BLHSP Alternative would include a smaller area of disturbance as compared to the proposed project. Consequently, the potential for the Alternative to result in substantial soil erosion or the loss of topsoil, as well as impacts related to being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, would be reduced as compared to the proposed project. Nonetheless, because the Alternative would still include on- and off-site ground disturbance, Mitigation Measure 4.5-2, which requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP), and Mitigation Measure 4.5-3, which requires the recommendations of the project-specific Preliminary Geotechnical Engineering Study to be implemented in improvement plans, would still be required. Overall, impacts related to Geology and Soils under the Buildout Pursuant to BLHSP Alternative would be fewer than the proposed project.

Hazards and Hazardous Materials

The overall disturbance area for the Buildout Pursuant to BLHSP Alternative would be reduced as compared to the proposed project. Thus, development of the Alternative could be designed to avoid the two wells within the Program Study Area and Mitigation Measure 4.6-2(c) would not be required. Because disturbance of on-site soils involves the potential to encounter NOA, similar mitigation to Mitigation Measure 4.2-3, which requires geologic evaluations of the project site to determine the presence or absence of NOA, as well as the preparation of an Asbestos Dust Mitigation Plan if NOA should be discovered, would still be required. In addition, although the Buildout Pursuant to BLHSP Alternative would not include the off-site sewer improvements, potential Recognized Environmental Conditions (RECs) were identified related to the off-site water line improvements. Thus, similar to the proposed project, the Buildout Pursuant to BLHSP Alternative could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. As such, Mitigation Measures 4.6-2(a) and 4.6-2(b), which require the preparation and submittal of a Phase I Environmental Site Assessment (ESA) of the off-site improvement areas and requires the project applicant complete any necessary remediation activities prior to initiation of ground-disturbing activities, would still be required under the Alternative. Overall, impacts related to Hazards and Hazardous Materials under the Buildout Pursuant to BLHSP Alternative would be fewer as compared to the proposed project.

Hydrology and Water Quality

Given that the Buildout Pursuant to BLHSP Alternative would include a reduced disturbance footprint as compared to the proposed project, the potential for the Alternative to result in construction and operational impacts related to water quality would be reduced as compared to the proposed project. Nonetheless, because the Alternative would still include ground-disturbing activities of land one acre in size or more, the Alternative would still be subject to the Construction General Permit and Mitigation Measure 4.7-1, which requires the preparation and implementation of a SWPPP, and Mitigation Measures 4.7-2(a) through 4.7-2(e), which require the preparation and implementation of a detailed Best Management Practice (BMP) and water quality maintenance plan and the project applicant to obtain applicable permits related to on-site water and wastewater infrastructure improvements, would still be required. Because the Alternative would include the development of 793 fewer residences than the proposed project, and would not include any commercial development, the amount of impervious surface created by the Buildout Pursuant to BLHSP Alternative would be reduced as compared to the proposed project. Nonetheless, similar to the proposed project, the Alternative could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, implementation of Mitigation Measures 4.7-4(a) and 4.7-4(b), which require implementation of Mitigation Measures 4.7-2(a) and 4.7-2(e), respectively, as described above, would still be required. Overall, because the Alternative would include a smaller disturbance footprint than the proposed project and would result in the creation of fewer impervious surfaces, impacts related to Hydrology and Water Quality under the Buildout Pursuant to BLHSP Alternative would be fewer than the proposed project.

Noise

Operational noise associated with the proposed project would consist of on-site vehicle noise, parking area noise, on-site delivery truck circulation and activity noise, heating, ventilation, and air-conditioning (HVAC) unit noise, and crowd and amplified noise associated with the Event Center/Museum. The Buildout Pursuant to BLHSP Alternative would only include the development of residential uses, which are not considered to be substantial sources of noise generation. Therefore, the Alternative would not be anticipated to result in the generation of a substantial permanent increase in ambient noise levels associated with the operations in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and Mitigation Measures 4.9-2(a) and 4.9-2(b), which prohibit on-site truck circulation during nighttime hours and require Event Center/Museum noise to comply with applicable noise standards, would not be required. Additionally, the significant and unavoidable noise impact associated with full buildout of the proposed project would not occur, and Mitigation Measure 4.9-3, which requires a noise study to be prepared to address operational noise associated with full buildout of the proposed project, would not be required. Overall, impacts related to Noise under the Buildout Pursuant to BLHSP Alternative would be fewer than the proposed project.

Transportation

Similar to the proposed project, the Buildout Pursuant to BLHSP Alternative would add construction vehicle traffic to area roadways, thereby potentially interfering with existing roadway operations during the construction phase. As such, Mitigation Measure 4.11-1 related to

preparation and implementation of a construction signing and traffic control plan would still be required under the Alternative. Because the Alternative would include the construction of 793 fewer residential units than the proposed project, the disturbance footprint would be reduced as compared to the proposed project. Thus, the overall intensity of construction traffic would be reduced as compared to the proposed project.

As discussed above, the proposed project would result in a significant and unavoidable impact related to a conflict with CEQA Guidelines Section 15064.3, subdivision (b) (related to VMT) and would cumulatively conflict with CEQA Guidelines Section 15064.3, subdivision (b). The Buildout Pursuant to BLHSP Alternative would include the development of 793 fewer residential units than the proposed project, which would result in fewer vehicle trips under the Alternative as compared to the proposed project, and, thus, a reduction in total VMT. However, because the Buildout Pursuant to BLHSP Alternative would involve development of the same project site as the proposed project, future residents would be anticipated to travel a similar distance under both scenarios. Therefore, the Buildout Pursuant to BLHSP Alternative would not result in a reduction in VMT per capita as compared to the proposed project. As such, even with implementation of Mitigation Measure 4.11-3, which requires the implementation of California Air Pollution Officers Association (CAPCOA) VMT reduction strategies, a significant and unavoidable impact would occur. Overall, impacts related to Transportation under the Buildout Pursuant to BLHSP Alternative would be fewer than the proposed project.

Tribal Cultural Resources

As noted above, because the Buildout Pursuant to BLHSP Alternative would include the development of 793 fewer residential units than the proposed project and would not include off-site sewer improvements, the Alternative would result in a smaller disturbance area than the proposed project. Thus, the potential for the Buildout Pursuant to BLHSP Alternative to result in disturbance or destruction of tribal cultural resources would be reduced as compared to the proposed project. Nonetheless, because the Buildout Pursuant to BLHSP Alternative would still involve ground-disturbing activities that could result in impacts to previously unknown tribal cultural resources, Mitigation Measures 4.12-1(a) through 4.12-1(e), which include guidance for tribal monitoring during on-site construction activities and procedures in the case that tribal cultural resources are encountered, would still be required under the Alternative. Overall, impacts related to Tribal Cultural Resources under the Buildout Pursuant to BLHSP Alternative would be fewer than the proposed project.

Wildfire

As discussed above, the disturbance area under the Buildout Pursuant to BLHSP Alternative would reduced as compared to the proposed project. Nonetheless, the Alternative would be subject to the same fire risk related to construction activities, specifically the potential use of equipment without spark arrestors. Because development of the Buildout Pursuant to BLHSP Alternative would result in a greater amount of the project site remaining in its current state than the proposed project, a greater amount of vegetation that could act as fuel for potential wildfires would remain on-site. Wildfire risks during operation due to existing on-site fuel sources and prevailing winds would consequently increase under the Alternative as compared to the proposed project. Therefore, Mitigation Measure 4.14-2, which requires the project applicant to submit a Vegetation Management Plan (VMP), would still be required. Overall, the impacts identified for the proposed project related to Wildfire could be greater under the Buildout Pursuant to BLHSP Alternative.

Higher Density Alternative

As noted above, the proposed project would result in significant and unavoidable impacts, including those related to GHG emissions and VMT. In their *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook),[1] CAPCOA sets forth VMT reduction strategies where the effectiveness of the strategies is supported by substantial evidence. Potential CAPCOA VMT reduction strategies are relevant to a project's location and land use context. It should be noted that most of the CAPCOA VMT reduction strategies also reduce GHG emissions and criteria pollutants, considered co-benefits, by reducing the source metric of VMT (i.e., vehicle ownership, number of vehicle trips, and trip distance). As such, implementation of CAPCOA strategies has the potential to reduce a project's significant impacts related to both GHG emissions and VMT. The CAPCOA strategy applied for the purposes of this chapter is Strategy T-1, Increase Residential Density.

As discussed in Chapter 4.11, Transportation, of this EIR, operations associated with the Project Development Area would result in VMT generation below the appropriate significance thresholds, and, thus, the residential and commercial uses in the Project Development Area would result in a less-than-significant impact related to VMT. Therefore, the Higher Density Alternative does not include any alterations to the Project Development Area. However, under full Project Buildout at 2040 horizon year conditions, while the prospective retail uses within the Program Study Area would not result in a significant impact related to VMT, the dwelling units constructed as part of the Program Study Area would generate a household VMT per resident that would exceed the applicable threshold of significance. Even with the implementation of Mitigation Measure 4.11-3, the impact was determined to be significant and unavoidable. Therefore, the Higher Density Alternative has been designed to address the significant and unavoidable impact related to the prospective residential uses within the Program Study Area.

Under the Higher Density Alternative, buildout of the Project Development Area of the project site would be the same as the proposed project and would include development of two hotels, retail services, two restaurants, a museum, an event center, associated parking, 56 residential cottages for employee housing, and an additional 56 residential cottages. Similar to the proposed project, the Alternative would require approval of a General Plan Amendment, BLHSP Amendments, Rezone, and Tentative Subdivision Map, as well as a potential conditional use permit and other responsible agency approvals. Additionally, this Alternative would require the same off-site water and sewer improvements as the proposed project, and similar to the proposed project, could construct an interim septic system to serve the Project Development Area until such time that future development proceeds within the Program Study Area, at which point the project would need to connect to public sewer.

Consistent with the proposed project, the Higher Density Alternative would also include the development of approximately 90,000 square feet of commercial uses within the Program Study Area; however, residential buildout of the Program Study Area under the Alternative would result in additional units as compared to the proposed project.

Table 6-1 presents a summary of the potential residential buildout of the Program Study Area under the proposed project and the Higher Density Alternative. As shown therein, future development of the Program Study Area under the proposed project could include up to 702 multi-family residential units within the portions designated as Multi-Family Residential (MFR) and

[1] California Air Pollution Control Officers Association. *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. December 2021.

Commercial (C). Under the Higher Density Alternative, the Program Study Area's MFR- and C-designated portions would be developed with 810 multi-family residential units, equal to a density of 30 du/ac. As established by El Dorado County Housing Element Measure HO-40, 30 du/ac is the maximum allowable residential density in multi-family residential land use designations. Thus, the Higher Density Alternative would include 108 additional residential units beyond what is currently anticipated within the Program Study Area for the proposed project, representing a net total of 922 residential units across the entire project site under the Alternative.

Table 6-1
Program Study Area Residential Land Use Comparison – Higher Density Alternative

		Proposed Project		Alternative	
Land Use	**Acres**	**Dwelling Units**	**Density Range**	**Dwelling Units**	**Density Range**
Multi-Family Residential	15.1	352	12 – 24 du/ac	810	30 du/ac
Commercial	11.9	350	22 – 30 du/ac		
Total	**27**	**702**	**--**	**810**	**--**

Because development of the Project Development Area under the Higher Density Alternative would be the same as the proposed project, all project objectives would be met by the Higher Density Alternative. In addition, because the Alternative would include the development of 108 more residential units within the Program Study Area than what is currently anticipated under the proposed project, the Alternative would further address Project Objective 1 by fulfilling goals of the El Dorado County General Plan through the provision of additional housing stock.

Aesthetics

The Higher Density Alternaitve would result in the development of 108 more residential units within the Program Study Area than is anticipated under the proposed project. All other components included as part of the proposed project would remain the same under the Higher Density Alternative. Given that the project site is predominantly undeveloped and affords views of the surrounding grassy hills and other natural landscape, similar to the proposed project, the existing visual character of the site would be significantly altered under the Higher Density Alternative. Mitigation Measure 4.1-3, which requires the preparation and implementation of a final landscaping plan, would still be required. Given that buildout of the Program Study Area under both the Alternative and proposed project would include commercial and residential uses, similar to the proposed project, even with the implementation of mitigation, the project-specific and cumulative impacts related to substantial degradation of the existing visual character or quality of public views of the site would remain significant and unavoidable. Because the Alternative includes an increase of 108 residential units relative to the proposed project, buildout of the Alternative could be more visually intrusive than the proposed project, but would not result in a substantial increase in the severity of the impact to the existing visual character and quality of public views of the site. Therefore, impacts related to Aesthetics under the Higher Density Alternative could be greater than the proposed project.

Air Quality, Greenhouse Gas Emissions, and Energy

Because the Higher Density Alternative would include the same development footprint as the proposed project, the Alternative's potential to expose sensitive receptors to NOA during construction would be the same as the proposed project. Therefore, implementation of Mitigation Measure 4.2-3 would still be required to reduce said impact to a less-than-significant level.

Because the Higher Density Alternative would include the development of up to 108 more residential units that what is anticipated under the proposed project, the Alternative would result in an increase in project-generated traffic or mobile and stationary emission sources as compared to the proposed project. As such, operation of the Higher Density Alternative would result in a greater contribution of pollutant emissions as compared to the proposed project. Thus, similar to the proposed project, even with implementation of Mitigation Measures 4.2-2(a) and 4.2-2(b), which require ROG emissions to be quantified and reduction measures to be identified, the Higher Density Alternative would exceed the EDCAQMD's thresholds of significance, conflict with the EDCAQMD's adopted attainment plans, and would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard. Therefore, impacts related to such would remain significant and unavoidable under the Higher Density Alternative.

As discussed below, VMT generation associated with the Higher Density Alternative would be reduced as compared to the proposed project. As such, the Alternative would result in an associated reduction in GHG emissions. Using the GHG Reduction Formula provided in the CAPCOA Handbook, the Higher Density Alternative could result in a 50.5 percent reduction in GHG emissions.[2] However, the maximum allowable reduction pursuant to the CAPCOA Handbook for Strategy T-1 is 30 percent; thus, the Higher Density Alternative would be considered to result in a 30 percent reduction in GHG emissions. Although the Alternative would reduce emissions of GHG, impacts related to GHG emissions are based on compliance with the Sacramento Metropolitan Air Quality Management District's (SMAQMD) BMPs. Mitigation Measures 4.2-7(a) and (b) would still be required under the Alternative in order to ensure compliance with SMAQMD's BMP-1 and BMP-2 related to natural gas usage and electric vehicle parking spaces, respectively. As discussed in further detail below, the Higher Density Alternative would result in reduced VMT such that the significant and unavoidable impact related to VMT would be avoided and Mitigation Measure 4.11-3 would not be required. Therefore, the Alternative would comply with SMAQMD BMP-3, Mitigation Measure 4.2-7(c) would not be required, and the cumulatively considerable and significant and unavoidable impact related to the generation of GHGs that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs would not occur under the Higher Density Alternative.

Based on the above, although the Higher Density Alternative would result in a greater contribution of criteria pollutant emissions as compared to the proposed project, and, thus, would result in an increase in the severity of the related significant and unavoidable impacts, the Alternative would avoid the significant and unavoidable impact related to GHG emissions. By increasing the severity of significant and unavoidable impacts (i.e., project-level and cumulative criteria pollutants) while avoiding another (i.e., GHG), the overall impacts related to air quality and GHG emissions would balance to some degree. However, for comparative analysis purposes of this EIR, simply focusing on the total number of significant impacts shows that this Alternative would result in fewer significant air quality/GHG related impacts than the proposed project. Thus, the overall impacts related to Air Quality, GHG Emissions, and Energy under the Higher Density Alternative would be considered fewer than the proposed project.

[2] ([Residential density of project development (30 du/ac) – Residential density of typical development (9.1 du/ac)] / Residential density of typical development (9.1 du/ac)]) x Elasticity of VMT with respect to residential density (-0.22) = -0.505 (50.5 percent GHG reduction).

Biological Resources

Similar to the proposed project, the Higher Density Alternative would include ground-disturbing activities on the project site, and would have the same development footprint as the proposed project. Thus, the Alternative would have the potential to impact special-status plants, Crotch's bumble bee, vernal pool fairy shrimp, monarch butterfly, northwestern pond turtle, nesting birds and raptors, and roosting bats either directly (e.g., cause a wildlife population to drop below self-sustaining levels, threaten to eliminate an animal community) or through substantial habitat modifications. In addition, the Alternative could result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities, or have a substantial adverse effect on federal or State protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Similar to the proposed project, because the Higher Density Alternative would also involve the removal of trees, the Alternative could conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance. As such, Mitigation Measures 4.3-1, 4.3-2, 4.3-3, 4.3-4, 4.3-5, 4.3-6, 4.3-7, 4.3-8, and 4.3-9, which require species-specific pre-construction surveys to be conducted, as well as Mitigation Measure 4.3-10, which requires the project proponent to implement minimization and avoidance measures to minimize or compensate for impacts to riparian habitat, and Mitigation Measures 4.3-11(a) through 4.3-11(d), which require the project proponent to obtain applicable permits for disturbance of aquatic resources, would still be required. Similarly, Mitigation Measure 4.3-13, which requires avoidance, minimization, and compensation related to the removal of on- and off-site trees, would still be required under the Alternative. Development of the Higher Density Alternative, in combination with other proposed and approved projects in the BLHSP area and El Dorado County, would result in a cumulatively considerable loss of wildlife habitat and oak woodlands. Therefore, the cumulatively considerable and significant and unavoidable impact related to the cumulative loss of habitat for special-status species and oak woodlands would still occur under the Higher Density Alternative, and Mitigation Measure 4.3-14 would still be required. Based on the above, overall impacts to Biological Resources would be similar under the Higher Density Alternative as compared to the proposed project.

Cultural Resources

While the Higher Density Alternative would include the development of additional residential units within the Program Study Area of the project site, all other components would be the same under the Alternative, and the overall development footprint would not change. As such, the Alternative's potential to cause a substantial adverse change in the significance of a unique archaeological resource or disturb human remains, including those interred outside of dedicated cemeteries, would be the same as the proposed project, and Mitigation Measures 4.4-2(a) through 4.4-2(c) and 4.4-3, which require appropriate measures should cultural resources be discovered on-site, would still be required. In addition, the Higher Density Alternative would still have the potential to encroach upon the Sacramento-Placerville Road, Mormon Hill Road-Lincoln Highway; even with the implementation of Mitigation Measures 4.4-1(a) and 4.4-1(b), which require the identification of on-site cultural resources and minimization of potential impacts, impacts to the foregoing cultural resource would be significant and unavoidable. Mitigation Measures 4.4-1(c) and 4.4-1(d), which require the off-site sewer line to avoid the historic macadam surface along the Old Bass Lake Road (Lincoln Highway), would still be required to reduce potential impacts to the aforementioned cultural resource to a less-than-significant level. Overall, potential impacts related to Cultural Resources under the Higher Density Alternative would be similar to the proposed project.

Geology and Soils

As noted above, the Higher Density Alternative would include the same overall area of disturbance as the proposed project. Consequently, the potential for the Alternative to result in substantial soil erosion or the loss of topsoil, as well as impacts related to being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, would be similar to the proposed project. As such, Mitigation Measure 4.5-2, which requires the preparation of a SWPPP, and Mitigation Measure 4.5-3, which requires the recommendations of the project-specific Preliminary Geotechnical Engineering Study to be implemented in improvement plans, would still be required. Overall, impacts related to Geology and Soils under the Higher Density Alternative would be similar to the proposed project.

Hazards and Hazardous Materials

Because the overall disturbance area for the Higher Density Alternative would be the same as the proposed project, all RECs identified on the project site, as well as potential RECs associated with the proposed off-site utility improvements, would still occur under the Alternative. Thus, similar to the proposed project, the Higher Density Alternative could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. As such, Mitigation Measures 4.6-2(a) and 4.6-2(b), which require the preparation and submittal of a Phase I ESA of the off-site improvement areas and requires the project applicant complete any necessary remediation activities prior to initiation of ground-disturbing activities, would still be required under the Alternative. In addition, Mitigation Measure 4.6-2(c), which requires the project applicant to properly abandon the on-site well, would also still be required under the Higher Density Alternative. Overall, impacts related to Hazards and Hazardous Materials under the Higher Density Alternative would be similar to the proposed project.

Hydrology and Water Quality

Given that the Higher Density Alternative would include the same overall area of disturbance compared to the proposed project, the potential for the Alternative to result in construction and operational impacts related to water quality would be similar to the proposed project. As such, Mitigation Measure 4.7-1, which requires the preparation and implementation of a SWPPP, and Mitigation Measures 4.7-2(a) through 4.7-2(e), which require the preparation and implementation of a detailed BMP and water quality maintenance plan and requires the project applicant to obtain applicable permits related to on-site water and wastewater infrastructure improvements, would still be required. Because the overall area of disturbance under the Higher Density Alternative would be the same as the proposed project, the Alternative would result in similar alterations to the existing drainage pattern of the site as compared to the proposed project. Therefore, implementation of Mitigation Measures 4.7-4(a) and 4.7-4(b), which require implementation of Mitigation Measures 4.7-2(a) and 4.7-2(e), respectively, as described above, would still be required. Overall, impacts related to Hydrology and Water Quality under the Higher Density Alternative would be similar to the proposed project.

Noise

Similar to the proposed project, operational noise associated with buildout of the Project Development Area under the Higher Density Alternative would consist of on-site vehicle noise, parking area noise, on-site delivery truck circulation and activity noise, HVAC unit noise, and crowd and amplified noise associated with the Event Center/Museum. Therefore, the Alternative

could result in the generation of a substantial permanent increase in ambient noise levels associated with the operations in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and Mitigation Measures 4.9-2(a) and 4.9-2(b), which prohibit on-site truck circulation during nighttime hours and require Event Center/Museum noise to comply with applicable noise standards, would still be required.

Because the Higher Density Alternative would include the development of commercial uses in the Program Study Area, operational noise associated with the foregoing uses would be similar to the proposed project. However, due to the increased residential density, the Higher Density Alternative would generate more traffic noise on internal and surrounding roadways. Because the actual noise generation associated with operation of the Higher Density Alternative cannot be determined, Mitigation Measure 4.9-3, which requires a noise study to be prepared to address operational noise associated with full buildout of the proposed project, would still be required, and the noise impact would remain significant and unavoidable. Overall, impacts related to Noise under the Higher Density Alternative would be similar the proposed project.

Transportation

Construction of the Higher Density Alternative would be similar to the proposed project, and the Alternative would add construction vehicle traffic to area roadways, thereby potentially interfering with existing roadway operations during the construction phase. As such, Mitigation Measure 4.11-1 related to preparation and implementation of a construction signing and traffic control plan would still be required under the Alternative.

As discussed in Chapter 4.11, Transportation, of this EIR, under the proposed project, the residential development within the Program Study Area would generate 22.9 VMT per resident, which exceeds the El Dorado County baseline average of 18.8 VMT per resident. Even with implementation of Measure 4.11-3, which requires the implementation of CAPCOA VMT reduction strategies, the impact would remain significant and unavoidable. The residential development within the Program Study Area under the Higher Density Alternative would increase to the maximum allowable density of 30 du/ac. According to the CAPCOA Handbook, for Strategy T-1, the percent reduction in VMT would be the same as the percent reduction in GHG emissions. As stated above, using the GHG Reduction Formula provided in the CAPCOA Handbook for Strategy T-1, the Higher Density Alternative could result in a 50.5 percent reduction in GHG emissions; however, the maximum allowable reduction pursuant to the CAPCOA Handbook for Strategy T-1 is 30 percent. Thus, consistent with the CAPCOA Handbook, because the VMT reduction would be the same as the GHG emissions reduction, the Higher Density Alternative would be considered to result in a maximum VMT reduction of 30 percent. A 30 percent reduction in VMT would reduce the project's estimated 22.9 VMT per resident to 16.03 VMT per resident (22.9 x 0.30 = 6.87; 22.9 – 6.87 = 16.03 VMT per resident), which would be below the El Dorado County baseline average of 18.8 VMT per resident. Therefore, implementation of Mitigation Measure 4.11-3 would not be required, and the significant and unavoidable impact related to a conflict with CEQA Guidelines Section 15064.3, subdivision (b) would not occur under the Higher Density Alternative. Overall, impacts related to Transportation under the Higher Density Alternative would be fewer as compared to the proposed project.

Tribal Cultural Resources

As noted above, the Higher Density Alternative would include the same disturbance area as the proposed project. Thus, the potential for the Higher Density Alternative to result in disturbance or destruction of tribal cultural resources would be similar to the proposed project. Consequently,

Mitigation Measures 4.12-1(a) through 4.12-1(e), which include guidance for tribal monitoring during on-site construction activities and procedures in the case that tribal cultural resources are encountered, would still be required under the Alternative. Overall, impacts related to Tribal Cultural Resources under the Higher Density Alternative would be similar to the proposed project.

Wildfire

As discussed above, the disturbance area under the Higher Density Alternative would be the same as under the proposed project. As such, the Alternative would be subject to the same fire risk related to construction activities, specifically the potential use of equipment without spark arrestors, as well as wildfire risks during operation due to existing on-site fuel sources and prevailing winds. Therefore, Mitigation Measure 4.14-2, which requires the project applicant to submit a VMP, would still be required. Overall, the impacts identified for the proposed project related to Wildfire would be similar under Higher Density Alternative.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. The environmentally superior alternative is generally the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the County. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, none of the impacts resulting from the proposed project would occur under the Alternative, as shown in Table 6-2 below. However, the No Project (No Build) Alternative would not meet any of the project objectives.

With respect to the Buildout Pursuant to BLHSP Alternative, because on-site ground disturbance would be limited to grading of house foundations and internal roads, and excavation of utility trenches, it is reasonable to assume that the Alternative could be designed with an emphasis on preserving and incorporating these features; thus, meeting Project Objectives 2 through 4. Because the Buildout Pursuant to BLHSP Alternative would include the development of only residential uses with generally uniform density, the Alternative would not meet the remaining project objectives.

With respect to the Higher Density Alternative, because development of the Project Development Area under the Higher Density Alternative would be the same as the proposed project, and because the Alternative would provide additional variety of the housing types and densities within the project site, all project objectives would be met by the Higher Density Alternative.

As discussed throughout this chapter and shown in Table 6-2, the Buildout Pursuant to BLHSP Alternative could result in a greater impact related to Wildfire and fewer impacts related to the remaining issue areas for which significant project impacts were identified. Moreover, under the Buildout Pursuant to BLHSP Alternative, the significant and unavoidable impacts identified for the proposed project related to Aesthetics; Air Quality, GHG Emissions, and Energy; Biological Resources; Cultural Resources; and Noise would not occur. The Buildout Pursuant to BLHSP Alternative would not avoid the significant and unavoidable impact related to Transportation (i.e.,

VMT). The Higher Density Alternative would result in two fewer impacts than the proposed project related to Transportation (i.e., VMT) and Air Quality, GHG Emissions, and Energy (i.e., GHG), greater impacts related to Aesthetics, and similar impacts related to the remaining issue areas for which project impacts were identified. Although the significant and unavoidable GHG impact and the significant and unavoidable Transportation (VMT) impact would not occur under the Higher Density Alternative, the Alternative would not avoid the remaining significant and unavoidable impacts related to Aesthetics; Air Quality (criteria pollutant emissions); Biological Resources; Cultural Resources; and Noise.

In conclusion, of the "build" alternatives, the Buildout Pursuant to BLHSP Alternative would result in the greatest reduction in the number of significant project impacts. However, the Buildout Pursuant to BLHSP Alternative would be considered a version of the No Project Alternative, and, thus, should not be considered in the selection of the Environmentally Superior Alternative. Of the "build" alternatives considered in this EIR, the Higher Density Alternative would be considered the Environmentally Superior Alternative.

Table 6-2
Comparison of Environmental Impacts for Project Alternatives

Resource Area	Proposed Project	No Project (No Build) Alternative	Buildout Pursuant to BLHSP Alternative	Higher Density Alternative
Aesthetics	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Greater*
Air Quality, Greenhouse Gas Emissions, and Energy	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Fewer*
Biological Resources	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Similar*
Cultural Resources	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Similar*
Geology and Soils	Less-Than-Significant with Mitigation	None	Fewer	Similar
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	None	Fewer	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Similar
Noise	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Similar*
Transportation	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer*	Fewer
Tribal Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Similar
Wildfire	Less-Than-Significant with Mitigation	None	Greater	Similar
	Total Greater:	**0**	**1**	**1**
	Total Fewer:	**11**	**10**	**2**
	Total Similar:	**0**	**0**	**8**

Note: No Impact = "None;" Greater than the Proposed Project = "Greater," Less than Proposed Project = "Fewer;" and Similar to Proposed Project = "Similar"

* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.