

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an EIR evaluate a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the proposed El Dorado Hills Apartments project (“proposed project”). An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the *State CEQA Guidelines*¹ pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that 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.
- 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 range of alternatives required in an EIR is governed by a “rule of reason.” Therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- The No Project alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur at the project site in the foreseeable future based on current plans and consistent with available infrastructure and community services if the project were not approved.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of potentially feasible alternatives is to be selected and discussed in a manner intended to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6.

suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to an alternative site.²

5.2 PROJECT OBJECTIVES

The underlying purpose of the proposed project is to make an economically viable use of the subject property in a manner that meets the planning policies and regulatory standards of the County of El Dorado while meeting a market demand for housing.

The objectives of the project are to develop a well-designed, economically feasible residential community that consists of a variety of residential unit types and incorporates smart growth elements. The applicant's key objectives for the proposed project are to:

- Implement the County's General Plan by directing growth to areas that are already developed with existing access to services, schools and transportation systems in order to preserve agricultural land and open space;
- Implement goals and objectives of the El Dorado Hills Specific Plan;³
- Provide a residential population to support commercial development within the Town Center East Planned Development area;
- Assist in increasing the housing supply in El Dorado County to improve the job-housing imbalance, including housing that is more affordable;
- Implement smart growth principles by developing underutilized properties with higher density housing projects.
- Develop a sustainable community that incorporates smart-growth elements, places higher-density housing in close proximity to job centers, and complements adjacent commercial uses; and
- Create a residential development that maximizes density with accessibility to alternate transportation modes, and integrates pedestrian, bicycle, transit, open space and outdoor uses to encourage active centers.

² California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6(f)(1).

³ See http://www.edcgov.us/Government/Planning/Zoning_Ordinances_for_Specific_Plans.aspx#El%20Dorado%20Hills for the goals and objectives listed in the El Dorado Hills Specific Plan.

5.3 IMPACTS OF THE PROPOSED PROJECT

To develop project alternatives, the County, as Lead Agency, considered the project objectives and reviewed the significant impacts of the proposed project, identified those impacts that could be substantially avoided or reduced through an alternative, and determined the appropriate range of alternatives to be analyzed. The Initial Study prepared for the proposed project and published on April 7, 2017, evaluated the potential impacts of the proposed project related to all CEQA topics. The following resource topics were evaluated further in this Draft EIR in **Chapter 4.0, Environmental Impact Analysis**: air quality, biological resources, cultural resources, greenhouse gas (GHG) emissions, land use and planning, noise, public services, transportation and traffic, utilities and service systems, and energy. The analysis in **Chapter 4.0** concluded that implementation of the proposed project would result in significant and potentially significant impacts in five resource areas: air quality, biological resources, cultural resources, transportation and traffic, and utilities and service systems. However, all of the significant and potentially significant impacts of the proposed project would be reduced to a less-than-significant level with the incorporation of mitigation measures. A summary discussion of project impacts under each resource area analyzed in the Draft EIR is presented below. **Table 5.0-3, Summary Comparison of Project Alternatives**, presented at the end of this chapter, lists all potentially significant and significant impacts of the proposed project.

5.3.1 Air Quality

The analysis in **Section 4.1, Air Quality**, of the Draft EIR, identified a potentially significant impact associated with construction phase emissions of criteria pollutants such as ozone precursors (reactive organic compounds [ROG] and oxides of nitrogen [NO_x]) and fugitive dust (**Impact AIR-1**), emissions of criteria pollutants such as ozone precursors (ROG and NO_x) during operation (**Impact AIR-2**), and exposing sensitive receptors to substantial pollutant concentrations associated with naturally occurring asbestos during construction (**Impact AIR-5**). However, all of these impacts would be reduced to a less than significant level with mitigation. Impacts associated with emissions of other criteria pollutants such as carbon monoxide (CO), particulates (PM₁₀ and PM_{2.5}), sulfur dioxide (SO₂), lead (Pb), sulfates (SO₄) and hydrogen sulfide (H₂S) would be less than significant. Finally, the analysis found that the proposed project would not conflict with an applicable air quality plan or create objectionable odors. No significant and unavoidable impacts related to air quality were identified.

5.3.2 Biological Resources

As analyzed in **Section 4.2, Biological Resources**, of the Draft EIR, the proposed project could have a potentially significant impact with respect to nesting birds (**Impact BIO-2**). However this impact would

be reduced to a less than significant level with mitigation. Impacts on candidate, sensitive, or special-status species or their habitat; riparian habitat; sensitive natural community; wetlands; and wildlife movement would be less than significant. No significant and unavoidable impacts associated with biological resources were identified.

5.3.3 Cultural Resources

The analysis found in **Section 4.3, Cultural Resources**, of the Draft EIR, identified potentially significant impacts associated with the disturbance of unknown archaeological resources (**Impact CUL-2**), disturbance of unknown human remains (**Impact CUL-4**), and disturbance of unknown tribal cultural resources (**Impact CUL-5**). However, these impacts would be reduced to a less-than-significant level with mitigation. Impacts associated with historical archaeological resources and paleontological resources were determined to be less than significant. No significant and unavoidable project-level impacts related to cultural resources were identified.

In addition, the analysis identified a potentially significant cumulative impact associated with cultural and tribal cultural resources (**Impact C-CUL-1**). However, with proposed mitigation, the project's contribution to this impact would be less than cumulatively considerable. No significant and unavoidable cumulative impacts related to cultural resources were identified.

5.3.4 Greenhouse Gas Emissions

As analyzed in **Section 4.4, Greenhouse Gas Emissions**, of the Draft EIR, the proposed project would not generate GHG emissions during construction and operation that would have a potentially significant impact on the environment. No significant and unavoidable impacts associated with GHG emissions were identified.

5.3.5 Land Use and Planning

The analysis in **Section 4.5, Land Use and Planning**, of the Draft EIR, found that the proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No significant and unavoidable impacts related to land use and planning were identified.

5.3.6 Noise

As analyzed in **Section 4.6, Noise**, of the Draft EIR, traffic and stationary noise sources associated with the proposed project would not cause a substantial permanent increase in noise levels at off-site receptors. In addition, although during construction, the proposed project would result in a substantial

temporary or periodic increase in ambient noise levels in the vicinity of the proposed project, the increase is not considered significant due to compliance with the County's noise ordinance. Finally, the proposed project would not expose on-site sensitive receptors to noise levels in excess of standards established in the County General Plan. No significant and unavoidable impacts associated with noise were identified.

5.3.7 Public Services

The analysis in **Section 4.7, Public Resources**, of the Draft EIR, found that the proposed project would not require the construction of new or physically altered fire, police, library, and parks and recreation facilities. No significant and unavoidable impacts related to public services were identified.

5.3.8 Transportation and Traffic

As analyzed in **Section 4.8, Transportation and Traffic**, of this Draft EIR, traffic generated by the proposed project would result in a significant impact at one intersection (El Dorado Hills Boulevard/Saratoga Way/Park Drive) under near-term cumulative plus project conditions (**Impact C-TRANS-1**). However, this impact would be reduced to a less-than-significant level with mitigation. In addition, the project's effect on the private intersection of Town Center Boulevard/Post Street under cumulative long-term plus project conditions, which is not required to be analyzed under CEQA, would be reduced with mitigation voluntarily proposed by the project applicant. No significant and unavoidable impacts associated with transportation and traffic were identified.

5.3.9 Utilities and Service Systems

The analysis in **Section 4.9, Utilities**, of this Draft EIR, identified a potentially significant impact associated with wastewater conveyance infrastructure (**Impact UTL-4**). However, this impact would be reduced to a less-than-significant level with mitigation. Impacts associated with water supply and infrastructure, and wastewater treatment capacity were identified as less than significant. No significant and unavoidable impacts related to utilities and service systems were identified.

5.3.10 Energy

The analysis in **Section 4.10, Energy**, of this Draft EIR, concluded that although the proposed project would result in an increase in energy demand, it would not result in a wasteful, inefficient or unnecessary consumption of energy resources, and the impact would be less than significant. No significant and unavoidable impacts associated with energy were identified.

5.4 ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the *State CEQA Guidelines* states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts.

During project scoping, the County received a request to locate the proposed project on a site located east of Vine Street between Rossmore Lane and White Rock Road. The possibility of locating the proposed project on this alternative site within the El Dorado Hills community was determined by the County to be infeasible given that neither the project applicant nor the County owns or controls the property. Therefore, the ability of the applicant to purchase this site to develop the project is considered speculative. In addition, the development of an apartment building of the same size at this location would result in similar impacts with respect to construction and operational air quality, cultural resources, and wastewater conveyance. Thus, placing the proposed development at this alternative site would not avoid the significant impacts of the proposed project.

The County also received requests from the public during project scoping to analyze a mixed-use alternative that would include ground floor retail above residential. This alternative was not considered as the retail component would generate more vehicle trips than the residential component that it would replace, thus resulting in greater traffic impacts and an increase in air quality and GHG emissions.

5.5 ALTERNATIVES EVALUATED IN DETAIL

According to the *State CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can avoid or substantially lessen the significant effects of the project, while feasibly attaining most of the basic project objectives. The *State CEQA Guidelines* indicate that the range of alternatives included in this discussion should be sufficient to allow decision-makers to make a reasoned choice. The alternative discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

Alternatives considered for detailed evaluation in this Draft EIR include potential alternate projects that meet most of the project's basic objectives while eliminating or reducing significant environmental impacts of the proposed project identified in **Section 4.0**. Alternatives considered in this Draft EIR for detailed evaluation include:

- No Project/No Development

- No Project/Existing Zoning
- Reduced Density

Table 5.0-3 provides a summary comparison of these alternatives in terms of their ability to reduce the significant and potentially significant impacts of the proposed project.

5.6 ALTERNATIVE IMPACT ANALYSIS

5.6.1 Alternative 1: No Project/No Development Alternative

Description and Analysis

Section 15126.6(e)(1) of the *State CEQA Guidelines*, states that, “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.” Under this alternative, no grading or new construction would occur on the project site and the site would remain vacant.

Description and Analysis

Air Quality

Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. Therefore, the proposed project’s impacts that would result from construction at the project site, including the potentially significant impacts related to emissions of criteria pollutants, fugitive dust, and emissions of naturally occurring asbestos during construction, would be avoided. The less than significant impact from the emissions of criteria pollutants during operations would also be avoided.

Biological Resources

No construction or grading activities would occur on the project site. As a result, the proposed project’s impacts that would result from construction at the project site, including the potentially significant impacts related to nesting birds, would be avoided.

Cultural and Tribal Cultural Resources

No construction or grading activities would occur on the project site. Therefore, the proposed project’s impacts that would result from construction at the project site, including potentially significant impacts related to disturbance of unknown archaeological resources, human remains, and tribal cultural resources

would be avoided. In addition, the proposed project would not contribute to a potentially significant cumulative impact to cultural and tribal cultural resources for the same reason.

Greenhouse Gas Emissions

Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. There would be no GHG emissions associated with construction and operation of proposed project. The proposed project's less than significant impacts associated with GHG emissions would be avoided under this alternative.

Land Use and Planning

Under the No Project/No Development alternative, no construction activities would occur at the project site and the site would remain vacant. Therefore, this alternative would not result in any land use impacts and the project's less-than-significant impacts related to land use would be avoided.

Noise

Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. There would be no noise associated with the construction and operation of proposed project. The proposed project's less than significant impacts associated with noise would be avoided under this alternative.

Public Services and Recreation

Under the No Project/No Development alternative, no construction activities would occur at the project site and the site would remain vacant. Therefore, this alternative would not result in an increase in county population and no impacts to public services would occur. The project's less-than-significant impacts on public services and recreation would be avoided.

Transportation and Traffic

Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. Therefore, the proposed project's impacts on traffic, including the proposed project's potentially significant impact at one intersection (El Dorado Hills Boulevard/Saratoga Way/Park Drive) under cumulative near-term plus project conditions, would be avoided. In addition, the project's effect on the private intersection of Town Center Boulevard/Post Street under cumulative long-term plus project conditions, which is not required to be analyzed under CEQA but for which a mitigation measure has been voluntarily proposed by the project applicant, would be also avoided.

Utilities and Service Systems

No construction or grading activities would occur on the project site. Therefore, the proposed project's impacts on utilities, including the potentially significant impact related to trunk sewer line capacity, would be avoided.

Energy

Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. There would be no energy consumption associated with the construction and operation of the proposed project. The proposed project's less than significant impacts associated with energy use would be avoided under this alternative.

Conclusion and Relationship to Project Objectives

The No Project/No Development alternative would avoid all of the potentially significant impacts of the proposed project. However, none of the project objectives would be met under this alternative.

5.6.2 Alternative 2: No Project/Existing Zoning

Description and Analysis

The *State CEQA Guidelines* state that "the 'no project' analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services." Should the proposed project not be approved by the County, it would be reasonable to expect that the project site would be developed by another entity consistent with the site's existing specific plan land use and zoning designations, and available infrastructure.

The project site is designated Commercial (C) in the El Dorado Hills Specific Plan (EDHSP) and zoned General Commercial-Planned Development (CG-PD). Based on a previous commercial land use proposal for the project site,⁴ this alternative would include seven buildings ranging in size from 2,750 square feet to 24,700 square feet. A total of 74,350 square feet of commercial building space, assumed to be retail, would be provided.⁵

⁴ CB Richard Ellis promotional materials

⁵ This amount of retail space is substantially lower than the amount of retail that could be entitled for this site under its current land use designation and zoning. However, this retail scenario is considered a realistic scenario as its development density is consistent with that of the adjoining commercial development in the TCE.

As shown in **Table 5.0-1 No Project/Existing Zoning Alternative Trip Generation**, the No Project/Existing Zoning alternative would generate 71 trips in the AM peak hour and 276 trips during the PM peak hour. Based on the County's zoning ordinance (one space per 300 square feet), a total of 478 parking spaces would be required.

**Table 5.0-1
No Project/Existing Zoning Alternative
Trip Generation**

Land Use	Trip Rates		Trips					
			AM Peak Hour			PM Peak Hour		
	AM	PM	In	Out	Total	In	Out	Total
Retail	0.96	3.71	44	27	71	132	143	276
Total								

Source: Source: Institute of Transportation Engineers' Trip Generation (9th Edition, 2012)

Air Quality

Under the No Project/Existing Zoning alternative, emissions of criteria pollutants during construction would be lower as the amount of building space (74,350 square feet) constructed under this alternative would be less than the proposed project (214,000 square feet). However, implementation of the same mitigation as recommended for the proposed project would be required to reduce exhaust emissions. The amount of fugitive dust, which could include naturally occurring asbestos, generated by this alternative would be the same, as the amount of area disturbed on the site would remain the same, and this alternative would implement the same mitigation measures. Impacts with respect to fugitive and naturally occurring asbestos under this alternative would also be reduced to a less than significant level with mitigation.

With respect to operational emissions, under the No Project/Existing Zoning alternative, emissions of ROG and NOX from area sources would decrease as the amount of space constructed (74,350 square feet) would decrease compared to the proposed project (214,000 square feet) while emissions of ROG and NOX from mobile sources would increase as the number of PM peak hour vehicle trips (276 PM trips) generated by the proposed retail under this alternative would be greater than the number of vehicle trips (105 PM trips) generated under the proposed project although the AM peak hour trips would be somewhat lower. As majority of the project's ROG emissions (97 percent) before mitigation are generated by area sources (wood burning hearths), emissions of criteria pollutants under this alternative would be substantially reduced as the amount of building space under this alternative would decrease by

approximately 65 percent. However, the reduction would not reduce ROG emissions below the significance threshold established by the County of El Dorado Air Quality Management District (EDCAQMD), and this alternative would implement the same mitigation measure as the proposed project to reduce impacts to a less than significant level. The project's NOx emissions are well below the EDCAQMD's significance threshold, and the increase in vehicle trips under this alternative would not be substantial enough to exceed the significance threshold, and thus the impact would remain less than significant.

The less than significant impacts of the proposed project associated with emissions of other criteria pollutants such as CO, particulates, SO₂, lead, sulfates, and H₂S would remain less than significant based on screening criteria established by the EDCAQMD. Finally, this alternative would not result in a conflict with an applicable air quality plan as emissions under this alternative would not exceed the EDCAQMD's threshold for criteria pollutants. This alternative would not create objectionable odors as the proposed retail use does not include any land uses that could subject existing receptors in the project vicinity to substantial odors.

Biological Resources

Similar to the proposed project, the No Project/Existing Zoning alternative would have the potential to result in a potentially significant impact to nesting birds. However, the mitigation measure identified for the proposed project would also apply to this alternative to reduce the impact to a less than significant level. This alternative would not adversely affect candidate, sensitive, or special-status species or their habitat as none of these species are located on the project site. In addition, this alternative would not indirectly affect any riparian habitat, sensitive natural community, or wetlands nor interfere with the movement of any wildlife species as these resources are not located on the project site. With respect to indirect impacts on the adjacent man-made lake, similar to the proposed project, development under this alternative would be required to adhere to National Pollutant Discharge Elimination System (NPDES) Permit regulations during construction, which would prevent pollutants from entering the water features. This impact would remain less than significant.

Cultural and Tribal Cultural Resources

Similar to the proposed project, the No Project/Existing Zoning alternative would disturb the project site and would have the potential to result in potentially significant impacts to unknown archaeological resources, human remains, and unknown tribal cultural resources. However, mitigation measures identified for the proposed project would also apply to this alternative to reduce the impacts to less than

significant levels. The less than significant impacts of the proposed project associated with historic architectural and paleontological resources would also occur under this alternative.

Similar to the proposed project, the No Project/Existing Zoning alternative could also result in potentially significant cumulative impacts to cultural and tribal cultural resources. However, mitigation measures identified for the proposed project that would also apply to this alternative would ensure that its contribution to this impact would be less than cumulatively considerable.

Greenhouse Gas Emissions

Under the No Project/Existing Zoning alternative, GHG emissions from area sources during operation would decrease as the amount of space constructed (74,350 square feet) would decrease compared to the proposed project (214,000 square feet) while GHG emissions from mobile sources would increase as the number of vehicle trips in the PM peak hour generated by the proposed retail under this alternative would be greater than the number of vehicle trips generated under the proposed project. While a majority of the project's GHG emissions (60 percent) are generated by mobile sources, the proposed project's per capita GHG emissions (2.98 MTCO_{2e}/capita) are substantially below the GHG efficiency threshold (4.5 MTCO_{2e}/capita), and even if the higher emissions from the increase in vehicle trips under this alternative were added in, the resulting per capita emissions for this alternative would not exceed the threshold. The GHG impacts of the alternative would remain less than significant.

Land Use and Planning

Similar to the proposed project, the No Project/Existing Zoning alternative would also not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect as it would be consistent with the specific plan and zoning land use designations for the project site. As with the proposed project, this impact would be less than significant.

Noise

Under the No Project/Existing Zoning alternative, noise generated by traffic would increase as the number of vehicle trips (71 AM trips and 276 PM trips) generated by the proposed retail under this alternative would be greater than the number of vehicle trips (109 AM trips and 105 PM trips) generated under the proposed project. With the exception of Town Center Boulevard, east of Post Street, the increase in traffic under this alternative would not be enough to result in an increase of 3 dBA or greater along surrounding roadways, which is the County's threshold of significance for project-related noise increases due to traffic. However, it is possible that the increase in traffic under this alternative would be

enough to result in an increase of 3 dBA or greater along Town Center Boulevard, compared to the increase in noise under the proposed project which is estimated to be 2.7 dBA. However, as there are no sensitive receptors along this segment, this impact would remain less than significant.

Noise generated by stationary sources such as HVAC systems and parking lots would be reduced under the No Project/Existing Zoning alternative as the amount of space constructed (74,350 square feet) would decrease compared to the proposed project (214,000 square feet), and thus the number of HVAC systems and parking spaces required would also be reduced. As with the proposed project, this impact would be less than significant.

Under the No Project/Existing Zoning alternative, noise generated during construction would be reduced in duration as the amount of space constructed would decrease compared to the proposed project. As with the proposed project, this impact would be less than significant.

No on-site sensitive receptors would be exposed to noise levels in excess of standards established in the County General Plan under the No Project/Existing Zoning alternative as retail employees and patrons are not considered sensitive receptors. No impact would occur under this alternative.

Public Services and Recreation

Similar to the proposed project, the No Project/Existing Zoning alternative would increase demand for fire and police services. However, as the amount of space constructed (74,350 square feet) would decrease compared to the proposed project (214,000 square feet), the demand for fire and police services under this alternative would be reduced. As with the proposed project, this impact would be less than significant.

Unlike the proposed project, the No Project/Existing Zoning alternative would not increase demand for libraries and parks and recreation facilities as this alternative does not include a residential component. No impact would occur with respect to these facilities.

Transportation and Traffic

Under the No Project/Existing Zoning alternative, the number of PM peak hour vehicle trips (276 PM trips) generated by the retail development would be greater than the number of vehicle trips (105 PM trips) generated under the proposed project. Similar to the proposed project, all study area intersections and freeway facilities would operate at an acceptable LOS under existing conditions with the addition of traffic from this alternative. As with the proposed project, traffic generated by this alternative would also significantly affect the intersection of El Dorado Hills Boulevard/Saratoga Way/Park Drive under near-term plus project conditions, and the same mitigation measure would apply. However, this alternative

would result in a new significant impact because with the addition of the traffic from this alternative, the intersection of Latrobe Road/White Rock Road would operate at an unacceptable LOS under long-term cumulative conditions, and an additional mitigation measure would be required. For this reason, the traffic impacts of this alternative would be greater than those of the proposed project. Similar to the proposed project, traffic generated under this alternative would also affect the private intersection of Town Center Boulevard/Post Street under cumulative long-term plus project conditions, and the same mitigation measure that has been voluntarily proposed by the project applicant but that is not required under CEQA, would need to be considered. Finally, the No Project/Existing Zoning Alternative would not conflict with policies, programs or plans for alternate transportation for the same reason.

Utilities and Service Systems

Similar to the proposed project, this alternative would result in a potentially significant impact associated with wastewater infrastructure. However, the extent of the impact would be reduced as the amount of space constructed (74,350 square feet) would decrease compared to the proposed project (214,000 square feet), and retail uses generate less wastewater than residential uses. The mitigation measure identified for the proposed project would still be required for this alternative to reduce the impact to a less-than-significant level. The less-than-significant impacts of the proposed project associated with water supply and infrastructure, and wastewater treatment capacity would be reduced for the same reasons, and would be less than significant.

Energy

Under the No Project/Existing Zoning alternative, the amount of energy demanded by the proposed structures would be lower as the amount of building space (74,350 square feet) constructed under this alternative would be less than the proposed project (214,000 square feet) while the amount of energy demanded by vehicles would increase as the total number of vehicle trips generated by the proposed retail under this alternative would be greater than the number of vehicle trips generated under the proposed project. However, the increase in energy use due to a greater number of trips under this alternative would not be substantial as vehicles traveling to and from the project site would be subject to statewide measures intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), thus improving vehicle fuel economies, and thereby conserving gasoline and diesel fuel. As with the proposed project, this impact would be less than significant.

Conclusion and Relationship to Project Objectives

The No Project/Existing Zoning alternative would increase the project's impacts related to transportation and traffic while decreasing the proposed project's impacts related to air quality, GHG emissions, noise, public services, utilities and service systems, and energy. Impacts related to biological resources and cultural resources would be similar to those of the proposed project. This alternative would not achieve many of the project objectives because it would not provide a residential population to support commercial development within the Town Center East Planned Development area, assist in increasing the housing supply in El Dorado County to improve the job-housing imbalance, and implement smart growth principles by developing underutilized properties with higher density housing projects. In addition, this alternative would not: develop a sustainable community that incorporates smart-growth elements; place higher-density housing in close proximity to job centers; and would not complement adjacent commercial uses. Finally, this alternative would not create a residential development that maximizes density with accessibility to alternate transportation modes, and would not integrate pedestrian, bicycle, transit, open space and outdoor uses to encourage active centers.

5.6.3 Alternative 3: Reduced Density

Description and Analysis

The Reduced Density alternative would reduce the number of residential units on the project site by approximately 50 percent. Specifically, this alternative would develop a residential project on the project site at a density of 24 units per acre, which is the density allowed under the El Dorado County General Plan's Multifamily Residential land use designation (see General Plan Policy 2.2.1.2). Under this alternative a total of 108 residential units would be provided in two 2-story buildings on the project site as opposed to a total of 214 residential units provided in two 4-story buildings under the proposed project. The mix of apartment units under this alternative would consist of 58 studio/1-bedroom units and 50 2-bedroom units. In addition, a total of 209 vehicle parking spaces and 11 motorcycle parking spaces would be provided in a central 3-story garage compared to a total of 409 vehicle parking spaces and 22 motor cycle parking spaces located in a central 5-story garage under the proposed project. This alternative would also include an additional five vehicle spaces of surface parking elsewhere on the site similar to the proposed project.

As shown in **Table 5.0-2, Reduced Density Alternative Trip Generation**, the Reduced Density alternative would generate 55 trips during the AM peak hour and 53 trips during the PM peak hour.

**Table 5.0-2
Reduced Density Alternative
Trip Generation**

Land Use	Trip Rates		Trips					
			AM Peak Hour			PM Peak Hour		
	AM	PM	In	Out	Total	In	Out	Total
Multifamily Housing (Dwelling Units)	0.51	0.62	11	44	55	44	23	67
Town Center Trips						9	5	14
Vehicle Trips External to Town Center			11	44	55	35	18	53

Source: Institute of Transportation Engineers' Trip Generation (9th Edition, 2012)

Air Quality

Similar to the proposed project, the Reduced Density alternative would result in potentially significant impacts associated with construction phase emissions of criteria pollutants, fugitive dust, and exposure of existing sensitive receptors to construction emissions of naturally-occurring asbestos. However, compared to the proposed project, the magnitude of these impacts would be less under this alternative because a smaller structure would be constructed. Mitigation measures identified for the proposed project would still apply to this alternative to control emissions and reduce the impacts to a less than significant level.

Similar to the proposed project, this alternative would result in potentially significant impacts associated with emissions of criteria pollutants such as ozone precursors during operation. However, compared to the proposed project, the magnitude of these impacts would be less under this alternative because fewer apartment units would be constructed. Mitigation measures identified for the proposed project would be required to reduce the impact to a less than significant level.

The less than significant impacts of the proposed project associated with emissions of other criteria pollutants such as CO, particulates, SO₂, lead, sulfates, and H₂S would still remain less than significant based on screening criteria established by the EDCAQMD. Finally, this alternative would not conflict with an applicable air quality plan as emissions under this alternative would not exceed the EDCAQMD's threshold for criteria pollutants, and this alternative would not create objectionable odors as the proposed residential do not generate substantial odors.

Biological Resources

Similar to the proposed project, the Reduced Density alternative would have the potential to result in a potentially significant impact to nesting birds. However, the mitigation measure identified for the proposed project would also apply to this alternative to reduce the impact to a less than significant level. This alternative would not adversely affect candidate, sensitive, or special-status species or their habitat as none of these species are located on the project site. In addition, this alternative would not indirectly affect any riparian habitat, sensitive natural community, or wetlands nor interfere with the movement of any wildlife species as these resources are not located on the project site. With respect to indirect impacts to the adjacent man-made lake, development under this alternative would be required to adhere to NPDES Permit Program regulations during construction, which would prevent pollutants from entering the water features, similar to the proposed project. As with the proposed project, this impact would be less than significant.

Cultural Resources and Tribal Cultural Resources

The Reduced Density alternative would result in similar potentially significant impacts associated with the disturbance of unknown archaeological resources, human remains, and unknown tribal cultural resources. Mitigation measures identified for the proposed project would also be required for this alternative to reduce impacts to less than significant levels. Similarly, the less than significant impacts of the proposed project associated with historic architectural and paleontological resources would be the same under this alternative.

The Reduced Density alternative could also result in potentially significant cumulative impacts to cultural and tribal cultural resources. However, mitigation measures identified for the proposed project that would also apply to this alternative would ensure that its contribution to this impact would remain less than cumulatively considerable.

Greenhouse Gas Emissions

Under this alternative, GHG emissions during construction would be reduced as the amount of building space constructed would be less than that of the proposed project. Similarly, GHG emissions during operation would also be reduced as a result of fewer apartment units and fewer trips generated under this alternative. The GHG impacts would be less than significant.

Land Use and Planning

Similar to the proposed project, the Reduced Density alternative would require a general plan and a specific plan amendment as well as rezoning, although it would not require a change in the density of multi-family residential development. With these amendments, the alternative would also not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. As with the proposed project, this impact would be less than significant.

Noise

The less than significant impacts of the proposed project associated with traffic noise would be reduced under the Reduced Density alternative as there would be fewer residential units, and thus the alternative would generate a fewer number of vehicle trips to the project site. As with the proposed project, this impact would be less than significant.

Noise generated by stationary sources such as HVAC systems and parking lots would be reduced under the Reduced Density alternative as the proposed structure would have fewer residential units, and thus would require fewer HVAC systems and parking spaces. This impact would be less than significant and reduced compared to the proposed project.

Less construction noise would be generated under the Reduced Density alternative as less building space would be constructed compared to the proposed project. This impact would be less than significant and reduced compared to the proposed project.

Fewer on-site sensitive receptors would be exposed to noise levels in excess of standards established in the County General Plan under the Reduced Density alternative as fewer residential units would be constructed compared to the proposed project. This impact would be less than significant and reduced compared to the proposed project.

Public Services and Recreation

Similar to the proposed project, the Reduced Density alternative would also increase demand for fire and police services. However, as fewer residential units would be constructed under this alternative, demand for fire, police, and library services and parks and recreation facilities would be reduced. This impact would be less than significant and reduced compared to the proposed project.

Transportation and Traffic

Under the Reduced Density alternative, the number of vehicle trips (55 AM trips and 53 PM trips) that would be generated would be less than the number of vehicle trips (109 AM trips and 105 PM trips) generated under the proposed project. As with the proposed project, all study area intersections and freeway facilities would operate at an acceptable LOS under existing conditions with the addition of traffic from this alternative. In addition, traffic generated by this alternative would also impact the intersection of El Dorado Hills Boulevard/Saratoga Way/Park Drive under near-term cumulative conditions, and the same mitigation measure would apply. The addition of traffic from this alternative would also affect the private intersection of Town Center Boulevard/Post Street under cumulative long-term plus project conditions, and the same mitigation voluntarily proposed by the project applicant but that is not required under CEQA would apply. In addition, the Reduced Density alternative would not conflict with policies, programs or plans for alternate transportation for the same reason. These impacts would be less than significant and reduced compared to the proposed project.

Utilities and Service Systems

Similar to the proposed project, this alternative would result in a potentially significant impact associated with wastewater infrastructure. However, the impact would be reduced under this alternative as fewer residential units would be constructed and less wastewater would be generated. The mitigation measure identified for the proposed project would also be required for this alternative to reduce the impact to a less-than-significant level. Less than significant impacts to water supply and infrastructure, and wastewater treatment capacity, would also be reduced compared to the proposed project as fewer residential units would be constructed.

Energy

Under the Reduced Density alternative, the amount of energy demanded by the proposed structure would be reduced as fewer residential units would be built. In addition, energy demanded by vehicles would be reduced as fewer vehicle trips would be generated under this alternative than the proposed project. This impact would remain less than significant.

Conclusion and Relationship to Project Objectives

The Reduced Density alternative would decrease the project's impacts related to air quality, GHG emissions, noise, public services, utilities and service systems, transportation and traffic, and energy. Impacts related to biological resources and cultural resources would be similar to those of the proposed

project. While this alternative would achieve many of the project objectives, it would not create a residential development that maximizes density with accessibility to alternate transportation modes

5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative to the proposed project that reduces some of the environmental impacts of the proposed project, regardless of the financial costs associated with this alternative. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Additionally, if the No Project Alternative is determined to reduce most impacts, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*State CEQA Guidelines* Section 15126.6).

Alternative 3, Reduced Density alternative is determined to be the environmentally superior alternative. As this alternative would provide as half as many units as the proposed project, it would reduce the project's significant and potentially significant impacts to the greatest extent. For this reason, Alternative 3 is the environmentally superior alternative.

**Table 5.0-3
Summary Comparison of Project Alternatives¹**

	Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/ No Development	Alternative 2: No Project/ Existing Zoning	Alternative 3: Reduced Development
AIR-1	Construction activities associated with the proposed project would result in a violation of an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable national or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)	S/LTS	Avoided	Reduced	Reduced
AIR-2	Operation of the proposed project would result in a violation of an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable national or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	S/LTS	Avoided	Reduced	Reduced
AIR-5	Project construction would expose sensitive receptors to substantial pollutant concentrations.	PS/LTS	Avoided	Similar	Reduced

	Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/ No Development	Alternative 2: No Project/ Existing Zoning	Alternative 3: Reduced Development
BIO-2	The proposed project would not directly or indirectly affect any riparian habitat, sensitive natural community, or wetlands nor interfere with the movement of any wildlife species, but project construction noise could affect nesting birds.	PS/LTS	Avoided	Similar	Similar
CUL-2	The proposed project could cause a substantial change in the significance of an archaeological resource pursuant to Section 15064.5.	PS/LTS	Avoided	Similar	Similar
CUL-4	The proposed project could disturb human remains, including those interred outside of formal cemeteries.	PS/LTS	Avoided	Similar	Similar
CUL-5	The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource.	PS/LTS	Avoided	Similar	Similar
C-CUL-1	Cumulative development could cause a substantial change in the significance of a historical resource or unique archaeological resource pursuant to Section 15064.5 or impact tribal cultural resources, but the proposed project would not contribute substantially to the cumulative impacts.	PS/LTS	Avoided	Similar	Similar
C-TRANS-1	Development of the proposed project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the traffic circulation system under Near-Term (2027) plus Project Conditions.	S/LTS	Avoided	Similar	Reduced
UTL-4	Development of the proposed project would require the construction of new or expanded wastewater conveyance systems.	PS/LTS	Avoided	Greater (S)	Reduced

Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/ No Development	Alternative 2: No Project/ Existing Zoning	Alternative 3: Reduced Development
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KEY

SU Significant and unavoidable

S Significant

PS Potentially significant impact

LTS Less than significant impact

Avoided Proposed project's impact avoided

Similar Impact similar to proposed project

Reduced Impact less than proposed project

Greater Impact greater than proposed project

1 This table lists only the significant or potentially significant environmental impacts of the proposed project.