

Explanation:

Exposure of site workers or the public to hazardous materials can occur from improper handling, storage, or use of hazardous materials or hazardous wastes during construction or occupancy of the project, particularly by untrained personnel, environmentally unsound disposal methods, transportation accidents, or fire, explosion or other emergencies. (Draft EIR, p. P-9.)

Hazardous materials will be used in varying amounts during construction and operation of the Project. Because the project is a residential development, however, the types and quantities of hazardous materials that can be present during occupancy of the project are expected to be minimal and will be limited to household-type products. Planned development activities and the types of hazardous materials that can be present at the project site are described in the Final EIR. (Draft EIR, p. P-9.)

Construction and operation of the Project will increase the number of structures using and storing hazardous materials within the project site. Future site residents can be exposed to hazards associated with accidental releases of hazardous materials, which can result in adverse health effects. The types and amounts of hazardous materials will vary according to the nature of the activity; therefore, the specific hazardous materials and amounts that will be on site or transported cannot be determined at this time. In some cases, it is the *type* of hazardous material that is potentially hazardous; in others, it is the *amount* of hazardous material that can present a hazard. However, assuming compliance with federal, state, and local laws and regulations will ensure that this impact is less than significant impact. (Draft EIR, p. P-9.)

Mitigation Measures:

Although mitigation measures are not required, implementation of the following measures will minimize the potential for adverse effects and comply with state and federal regulations:

- REQ-MM The project applicant shall comply, at minimum, with the provisions of Titles 8 and 22 of the Code of California Regulations, the Uniform Fire Code, and Chapter 6.95 of the California Health and Safety Code, as well as any other applicable regulation. (Draft EIR, pp. P-8, P-9.)

X. PROJECT ALTERNATIVES

Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a project as proposed will still cause one or more significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. As noted earlier, in Section VI of these Findings,

an alternative may be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project. Thus, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." of a project. (*City of Del Mar, supra*, 133 Cal.App.3d at p. 417; see also *Sequoyah Hills, supra*, 23 Cal.App.4th at p. 715.)

The detailed discussion in Section IX demonstrates that all significant environmental effects of the project except for a few have been either substantially lessened or avoided through the imposition of existing policies or regulations or by the adoption of additional, formal mitigation measures recommended in the EIR. The only significant effects that have not been at least substantially lessened are the following: E-1: change in visual character of project site; E-4 (cumulative change in visual character of area); I-1 (short-term loss of native oak trees); and O-5 (cumulative loss of cultural resources). In this section (X) of these Findings, then, the City need only focus on the extent to which any of the alternatives described in the EIR are environmentally superior to the Project as mitigated with respect to these four significant, unavoidable effects. (See *Laurel Hills, supra*, 83 Cal.App.3d at pp. 519-527; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 730-731 [270 Cal.Rptr. 650]; and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 400-403 [253 Cal.Rptr. 426].)

For the sake of full disclosure, however, the City notes that the following significant effects, though substantially lessened by mitigation, also remain significant and unavoidable. The following impacts remain significant: E-5: contribution to cumulative light and glare in the region; I-3: disturbance and/or loss of natural habitat on the project site, including loss of annual grassland, oak woodland, and riparian habitats; I-11: contribution to cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region; K-1: generation of criteria air pollutants from construction emissions (short-term) in excess of Placer County APCD thresholds; and K-5: cumulative contribution of air pollutants that will hinder the ability of the air district to achieve attainment for O₃ and PM₁₀.

Although, as noted above, CEQA requires only that these Findings focus on the significant effects that are neither substantially lessened nor avoided by feasible mitigation, these Findings will nevertheless address – again, for reasons of full disclosure – the environmental merits of the alternatives with respect to all broad categories of impacts. The Findings will also assess whether each alternative is feasible in light of the City's objectives for the Project.

The City's review of project alternatives is guided primarily by the need to reduce potential impacts associated with the Project, while still achieving the basic objectives of the Project. As noted earlier, the goals of the Project are to fulfill the following project objectives, as identified in the Project itself:

- 1) Increase the City's housing supply in close proximity to existing transportation corridors and employment centers to minimize trip length for employees.
- 2) Design a residential development that is consistent with the City's land use designation and zoning for the site, and compatible with existing nearby neighborhoods.
- 3) Provide residential uses in an area contiguous to existing development and finance required infrastructure.
- 4) Preserve Secret Ravine and protect other significant onsite natural resources through appropriate project design.
- 5) Construct planned roadway improvements (bridge) specified in the City's Circulation Element Update - Southeast Rocklin Area.
- 6) To the extent considered appropriate by the Placer County Flood Control and Water Conservation District, detain on-site drainage such that the rate of runoff flow is maintained at pre-development levels.

(Final EIR, p. B-8.)

The EIR identified the following six potentially feasible alternatives to the Project: No Project/No Development Alternative; Reduced Units and Expand Open Space Alternative; Reduction in Density Alternative; No Monument Springs Drive Extension Alternative; Offsite Alternative; and Open Space Ownership/Access Alternative. Each of these Alternatives will be discussed in detail below.

Alternative 1: No Project/No Development Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project/No Development" alternative (CEQA Guidelines section 15126.6, subd. (e)). The No Project/No Development Alternative can be defined either as "no action taken on the Project" or "no development" on the project site. (Draft EIR, p. Q-5.)

A "no action" alternative would assume that future conditions would be what is reasonably expected to occur under current plans and consistent with available infrastructure and community services. This would be consistent with the City's General Plan. As discussed in the EIR, the 1991 General Plan assumed development of the project site with uses similar to the Project. The General Plan assumptions for the project site provided for the same number of residential units (1.5 dwelling units per acre) as the Project. Because the same level of development is assumed under the General Plan, the impacts of this alternative would be the same as those of the Project. Therefore, this

alternative was not considered further in the EIR. (Draft EIR, p. Q-5.)

A "no development" alternative assumes that no new development would occur on the project site and it would remain, as it is today, undeveloped with the exception of the one single-family residence located on a parcel surrounded by the project site. Under this alternative, it is assumed the site would be downzoned to ensure no development would occur on the site. The residence would remain on its site and is not considered part of the Project. The site-specific impacts of the "No Project/No Development" alternative are best described by the existing conditions presented in the setting sections of the technical chapters of the EIR. The impacts of the No Project/No Development Alternative in comparison to the Project are described below. (Draft EIR, p. Q-5.)

Land Use

Under the Project, the impacts addressing consistency with the City's General Plan and compatibility with existing and planned uses were all determined to be less than significant. Under the No Project/No Development Alternative, the project site would remain as it is; therefore, no impacts would occur. However, by eliminating this site for new housing, this alternative would reduce the City's available sites to provide housing. This could conflict with the City's goals and policies regarding the provision of housing. (Draft EIR, p. Q-6.)

Under this alternative, the City would downzone the land to ensure the site would not be developed. This would eliminate the City's ability to provide housing on this site, which can potentially put more pressure on other land in the City that may not be designated for housing to be developed with residential uses. (Draft EIR, p. Q-6.)

Visual Resources

The Project will change the character of the site resulting in a significant and unavoidable impact. The No Project/No Development Alternative would not include new development, so it would not change the existing character of the site, adversely effect the existing visual adjacent uses, and would not increase light or glare in the area. (Draft EIR, p. Q-6.)

The Project will contribute to a cumulative change in visual character and contribute to a cumulative increase in light and glare. This alternative does not include new sources of light or glare, so it would not contribute to a cumulative increase. (Draft EIR, p. Q-6.)

Population, Employment and Housing

The Project will result in an increase in population and change in the City's jobs/housing balance. The Project is also consistent with the City's General Plan policies. The No Project/No Development Alternative does not include development, so it would not change the City's current population or availability of housing. However, it could conflict

with the City's goals and policies regarding the provision of housing or potentially conflict with the City's jobs/housing balance. (Draft EIR, p. Q-6.)

Geology, Soils and Seismicity

The Project will result in exposure of people and property to seismic groundshaking and cumulative exposure of people and property to seismic hazards. Under the No Project/No Development Alternative, the site would remain undeveloped and, therefore, there would be no increased risk of exposure of people or property to seismic hazards and no hazards associated with construction. (Draft EIR, p. Q-7.)

The potential for the Project to alter site topography and affect the rate or extent of erosion was found to be potentially significant. The No Project/No Development Alternative would not grade or otherwise disturb the project site. Under this alternative, there would be no impact related to erosion and topography. (Draft EIR, p. Q-7.)

Hydrology, Water Quality and Flooding

The Project will increase the rate and amount of stormwater runoff from newly created impervious surfaces, which can contribute to localized or downstream flooding. People will be exposed to flooding hazards, increase in stormwater runoff, and construction activities that can degrade water quality in Secret Ravine Creek. No development will occur under the No Project/No Development Alternative, so development would not be sited in a flood zone, create stormwater runoff over existing conditions, or result in any construction activities that could increase erosion. (Draft EIR, p. Q-7.)

Under the Project, the cumulative impact of construction activities that can affect water quality in Secret Ravine Creek is found to result in a less-than-significant impact assuming compliance with the State General Construction Activity Permit. The cumulative increase in impervious surfaces resulting in more urban contaminants affecting water quality was determined to be less than significant. The increase in rate and volume of stormwater runoff was found to be a less-than-significant impact. No development would occur under the No Project/No Development Alternative, so there would be no contribution to these cumulative impacts. (Draft EIR, p. Q-8.)

Biological Resources

The Project will result in the loss of native oak trees. Under the No Project/No Development Alternative, the site would remain as it is today, undeveloped with the exception of the one residence located in the center of the project site. There would be no loss of native oak trees. (Draft EIR, p. Q-8.)

Development of the Project will result in disturbance and/or loss of natural habitat on the project site, including loss of annual grassland, oak woodland and riparian habitats. Under the No Project/No Development Alternative, the project site would remain as it is today, undeveloped with the exception of the one residence located in the center of the project site. This would eliminate the direct impact due to project development. However, under this alternative, there is an increased likelihood that illegal four-wheel driving and other trespassing activity could occur. This could cause a potentially significant impact from disturbance and/or loss of natural habitat on the site associated with these activities. (Draft EIR, p. Q-8.)

The Project would fill 0.488 acre of seasonal wetlands and other jurisdictional waters of the U.S. No development would occur under the No Project/No Development Alternative, so no wetlands would be converted. (Draft EIR, p. Q-8.)

Development of the Project can disturb and/or displace nesting raptors from the project site. No development would occur under the No Project/No Development Alternative, so no raptors would be disturbed and/or displaced from the project site. (Draft EIR, p. Q-9.)

Development of the Project will remove elderberry shrubs, some of which may host the valley elderberry longhorn beetle (VELB). No development would occur under the No Project/No Development Alternative, so no elderberry shrubs would be disturbed within the project site. (Draft EIR, p. Q-9.)

The Project will increase human activity in and adjacent to Secret Ravine Creek that can disturb fall-run chinook salmon and the federally-threatened Central Valley steelhead. Under the No Project/No Development Alternative, the project site would remain as it is today, undeveloped with the exception of the one residence located in the center of the project site. Human activity would most likely remain the same as it currently is today. (Draft EIR, p. Q-9.)

Development of the Project can increase sedimentation and pollution of Secret Ravine Creek and Dry Creek, which can degrade habitat for the fall-run chinook salmon and the Central Valley steelhead. No development would occur under the No Project/No Development Alternative, so habitat for the fall run chinook and Central Valley steelhead would not be disturbed. (Draft EIR, p. Q-9.)

Stormwater runoff from the Project can contain urban contaminants that can degrade water quality in Secret Ravine Creek and downstream drainages, degrading habitat for fall-run chinook and Central Valley steelhead. Under the No Project/No Development Alternative, the project site would remain essentially undeveloped. Habitat for the fall run chinook and Central Valley steelhead in Secret Ravine and downstream drainages would not be disturbed. (Draft EIR, p. Q-9.)

Construction of the bridge across Secret Ravine Creek can affect special-status aquatic species. Under the No Project/No Development Alternative, no new development would occur. Special-status aquatic species would not be affected. (Draft EIR, p. Q-10.)

Construction of the Project, in combination with other development in the County, can contribute to the cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region. Under the No Project/No Development Alternative, no new development would occur. Habitat conditions would not change from the current conditions under this alternative. (Draft EIR, p. Q-10.)

Construction of the Project, in combination with other development in this region, can contribute to the cumulative loss or deterioration of salmon and steelhead habitat and to the loss of aquatic resources in the region. Under the No Project/No Development Alternative, no new development would occur. Habitat conditions would not change from the current conditions under this alternative. (Draft EIR, p. Q-10.)

Transportation/Circulation

Under the Project, traffic associated with the Project will increase congestion on City of Rocklin roadways and intersections. Under the No Project/No Development Alternative, there would not be any increases in traffic from the project site, so there would not be any impact on City or County roadways. There would not be an increase in demand for transit services or bicycle facilities. For these reasons, there would be no impacts under this alternative because the existing conditions would not change. (Draft EIR, p. Q-10.)

Air Quality

Activities associated with Project construction will generate criteria air pollutants that will exceed Placer County APCD standards. No development would occur under the No Project/No Development Alternative, so there would be no construction impacts. (Draft EIR, pp. Q-10, Q-11.)

Emissions associated with Project operation will be significant. No development would occur under the No Project/No Development Alternative, so there would be no impacts associated with project operation. (Draft EIR, p. Q-11.)

The potential for localized pockets of woodsmoke will occur associated with fireplace and woodstoves. Under the No Project/No Development Alternative, there would be no development, so no impact would result due to the presence of woodsmoke. (Draft EIR, p. Q-11.)

Although project-related traffic will contribute to local CO emissions under the Project, these emissions will not exceed State or Federal standards. The No Project/No Development Alternative would not create additional traffic, so there would be no new

traffic-related emissions. (Draft EIR, p. Q-11.)

Project emissions, in combination with other development in the air basin, can interfere with achievement of the air district attainment goals for Ozone and PM₁₀. Because the No Project/No Development Alternative would not increase emission levels over existing conditions, no impact would occur. (Draft EIR, p. Q-11.)

Noise

Construction activities will temporarily increase noise levels at existing noise-sensitive land uses. The No Project/No Development Alternative would not include construction, so there would be no construction noise impact. (Draft EIR, p. Q-11.)

Project operation will increase noise levels at existing noise-sensitive land uses located on and off the project site, increase in traffic noise associated with project operation, and the increase in future noise levels associated with project traffic. Under the No Project/No Development Alternative, no new noise would be created because the project site would not be developed. (Draft EIR, p. Q-11.)

Public Services

Law Enforcement

Under the Project, there will be a demand on police services and additional demands on police protection services created by cumulative development in the City of Rocklin. Because the No Project/No Development Alternative includes no development, demands on police services would not increase from current conditions. This alternative would not contribute to cumulative impacts on police services. (Draft EIR, p. Q-12.)

Fire Protection and Emergency Services

The Project will increase the demand for fire protection and emergency services. There will be impacts associated with response time and emergency access. The development of the Project on steep slopes can reduce adequate fire access. Additional demands on fire protection and emergency services created by cumulative development in the City of Rocklin were found to be less than significant. Because the No Project/No Development Alternative does not include development, there might be an increased risk of wildland fires because lands within the project site are considered to be of moderate to high fire severity. Under this alternative, the fire probability could result in an impact because the site would remain undeveloped. (Draft EIR, p. Q-12.)

Schools

The Project will increase the number of school-age children. However, there is adequate capacity in either existing or planned schools to accommodate the Project. Additional demand on school facilities created by cumulative development in the City of Rocklin were found to be less than significant. The No Project/No Development Alternative would not increase the demand on schools. (Draft EIR, p. Q-12.)

Parks

The Project will increase the demand for park facilities. The Project does not include any active parks, only passive open space. The No Project/No Development Alternative would not increase the demand for park facilities because no development would occur. (Draft EIR, pp. Q-12, Q-13.)

Public Utilities

Water

Under the Project, the demand for water supply and treatment will increase. However, adequate water supplies and treatment capacity are available to serve the Project site. Under the No Project/No Development Alternative, there would be no additional demand for water supply or treatment. (Draft EIR, p. Q-13.)

Construction of the new water distribution system will be done in compliance with PCWA's standards, which will ensure that the Project's infrastructure was adequately sized and connected to PCWA's system. The No Project/No Development Alternative would not require the construction of a new water distribution system. There would be no impact on the water system associated with this alternative. (Draft EIR, p. Q-13.)

The increased water demand generated by the Project will increase Citywide demand for water supply, treatment, and conveyance. The increase in water supply, treatment and conveyance, in conjunction with cumulative development in the City of Rocklin and PCWA's service area, was found to result in less-than-significant impacts. Because no development would occur under the No Project/No Development Alternative, there would be no impact. (Draft EIR, p. Q-13.)

Wastewater

The Project will increase the City's population and will result in increased wastewater flows. A new wastewater treatment plant is under construction that will serve the project site. In addition, the existing wastewater treatment plant is in the process of being expanded to provide incremental capacity for growth anticipated to occur in the area. The No Project/No Development Alternative would not generate additional wastewater-producing uses. This alternative would not increase wastewater flows beyond existing

conditions, and there would be no impact on wastewater treatment services. (Draft EIR, p. Q-13.)

The Project, in combination with other development in the City, will increase demand for wastewater collection and treatment. The Project's cumulative contribution was determined to be less than significant. No impact would occur under the No Project/No Development Alternative. (Draft EIR, p. Q-13.)

Solid Waste

The Project will generate an increase in solid waste. However, there is adequate capacity at the landfill to accommodate this increase. The cumulative contribution also determined that the impact would be less than significant. Under the No Project/No Development Alternative, no solid waste would be generated. (Draft EIR, p. Q-14.)

In addition to solid waste generated after the Project is completed, there will be an increase in solid waste during Project construction. The impact will be less than significant because there is adequate capacity at the landfill to accommodate this additional waste. Under the No Project/No Development Alternative, no solid waste would be generated associated with project construction. (Draft EIR, p. Q-14.)

Natural Gas and Electrical Services

Project-specific and cumulative impacts on natural gas and electrical services will be less than significant because new development will be responsible for the costs associated with the necessary expansion and upgrading of the systems. Under the No Project/No Development Alternative, there would be no impact on natural gas or electrical services. (Draft EIR, p. Q-14.)

Cultural Resources

The Project can damage or destroy unidentified historic and/or prehistoric resources. Under the No Project/No Development Alternative, there would be no impact on cultural resources because the site would not be disturbed. (Draft EIR, p. Q-14.)

Development of the Project will disturb identified resources on the project site. Under the No Project/No Development Alternative, there could be an impact associated with trespassers on the project site potentially disturbing any identified resources. (Draft EIR, p. Q-14.)

Development of off-site infrastructure can damage or destroy any unidentified resources. Under the No Project/No Development Alternative, there could be impacts to any unidentified resources associated with people trespassing in the site and potentially disturbing these resources. (Draft EIR, p. Q-14.)

The Project is consistent with the City of Rocklin's General Plan policies, and thus creates no impacts associated with the potential for inconsistency. Under the No Project/No Development Alternative, no such impacts would occur. (Draft EIR, p. Q-14.)

Development of the Project, in combination with other development in the Secret Ravine watershed, will contribute to the cumulative loss of cultural resources in the County. Under the No Project/No Development Alternative, no impact would occur because the site would not be disturbed. (Draft EIR, p. Q-15.)

Public Safety and Hazards

Construction and occupancy of the Project was determined not to result in a significant impact because existing State and federal laws highly regulate the use of hazardous materials. However, development of the site can expose future occupants and construction workers to localized soil or groundwater contamination. Under the No Project/No Development Alternative, the site would not be developed so workers and project occupants would not be exposed to any potentially hazardous soil or groundwater. (Draft EIR, p. Q-15.)

Development of the Project site can expose Project occupants and the public to physical hazards associated with the two granite quarries located on the project site. Under the No Project/No Development Alternative, project occupants and the public would not be exposed to any physical and chemical hazards associated with the two quarries because no development would occur. However, people trespassing on the project site could be exposed to these hazards. (Draft EIR, p. Q-15.)

Exposure of Project residents to rattlesnakes will result in a less-than-significant impact. Project development will increase the potential for wildland fires. The Project, in combination with other development, will increase the number of people exposed to safety hazards and hazardous materials. The Project, in combination with other development, can expose people to increased wildland fire hazards. Under the No Project/No Development Alternative, the site would not be developed so there could be increased hazards associated with wildland fires due to the amount of flammable material on the site. There would be no hazards associated with rattlesnakes or any other hazard because the site would not be occupied by people. (Draft EIR, p. Q-15.)

Relationship of the No Project/No Development Alternative to the Project Objectives; Infeasibility of Alternative

The No Project/No Development Alternative would not meet any of the Project objectives. Because no development would occur under this alternative, no new housing would be provided, planned roadway improvements would not be constructed, and no new infrastructure would be provided. (Draft EIR, p. Q-15.) For these reasons, the City Council determines that No Project/No Development Alternative is infeasible. (*City of*

Del Mar, supra, 133 Cal.App.3d at p. 417; see also *Sequoyah Hills, supra*, 23 Cal.App.4th at p. 715.)

Furthermore, California law does not permit the City to deny the 119-unit project as proposed by the applicant. Government Code section 65589.5, subdivision (j), imposes severe constraints on a local government's ability to deny or reduce the density of any "housing development project" that complies with applicable "general plan and zoning standards and criteria[.]" Such a denial or density reduction is legally permissible only where a city or county decisionmaking body can make written findings identifying substantial evidence showing that such action is necessary to avoid a "specific, adverse impact upon the public health and safety[.]" Here, because the Project complies with all relevant general plan and zoning standards and criteria, and does not cause any adverse effects on public health and safety, the City is required by law to approve the Project as proposed. (See *Sequoyah Hills, supra*, 23 Cal.App.4th at p. 715.)

Alternative 2: Reduced Units and Expanded Open Space Alternative

Under the Reduced Units and Expanded Open Space Alternative, a total of 89 units would be developed at the same density as the Project, resulting in a reduction of 30 dwelling units from what was assumed under the Project. Based on the current density of 1.5 units per acre, a total of 37.71 acres would be left in undeveloped open space, an increase of 11.8 acres from the Project. Based on the City's persons per household factor of 2.6, this alternative would generate a population of approximately 231 residents. (Draft EIR, p. Q-16.)

For this analysis, it is assumed that the roadway system, including the extension of Monument Springs Drive, the bridge across Secret Ravine Creek, and infrastructure would be the same as those planned for the Project. (Draft EIR, p. Q-16.)

Land Use

The Project will be consistent with current City plans, policies, and ordinances and will allow development of land uses that will be compatible with existing or planned surrounding land uses. Alternative 2 would develop essentially the same project, but with fewer residential units. Therefore, under this alternative, the impacts would all remain less than significant, the same as the Project. (Draft EIR, p. Q-16.)

Visual Resources

The development of the Project will replace the open character of the Project site with an urban setting. Alternative 2 would be located on the same site as the Project and would also replace open space with an urban setting. The impact would be considered slightly less severe than the Project because a smaller area would be developed, leaving a larger area of undisturbed open space (37.71 acres vs. 25.91 acres). (Draft EIR, p. Q-16.)

The Project will be visually compatible with existing and planned residential uses. Alternative 2 would also be visually compatible with existing and planned residential uses because it is essentially the same project with fewer units. There would be no change in the severity of this impact under Alternative 2. (Draft EIR, p. Q-16.)

Light and glare from the Project can substantially alter the nighttime lighting character of the area. Alternative 2 could also substantially alter the nighttime lighting character of the area because the same roadway system would be developed under this alternative. However, because fewer residences would be developed, the total magnitude of light would be less than the Project. Any development under this alternative, would also be required to comply with the City's lighting standards. The impact would be considered slightly less severe than the Project. (Draft EIR, pp. Q-16, Q-17.)

The Project will contribute to the cumulative change in visual character of the region from undeveloped land to a developed environment. Alternative 2 would also contribute to this cumulative change. However, because of its smaller scale, its contribution would be slightly smaller and the impact slightly less severe than the Project. (Draft EIR, p. Q-17.)

The Project will also contribute to an increase in cumulative light and glare in the region. Alternative 2 would also contribute to cumulative light and glare in the region. However, because of its smaller scale, its contribution would be slightly smaller and the impact slightly less severe than the Project. (Draft EIR, p. Q-17.)

Population, Employment, and Housing

Under the Project, there will be an increase in the City's population over existing conditions. Alternative 2 would also result in an increase in the City's population. However, the impact would be slightly less severe because only 231 residents would be added under this alternative. (Draft EIR, p. Q-17.)

The Project will change the Citywide jobs/housing ratio. Alternative 2 would also change the Citywide jobs/housing ratio. However, the impact would be considered slightly less severe because the amount of housing developed would be less than the Project. (Draft EIR, p. Q-17.)

The Project will be consistent with the City of Rocklin General Plan Housing Policy regarding the provision of housing. Alternative 2 would also be consistent with the City of Rocklin General Plan policies regarding the provision of housing and future buildout in the City. Alternative 2 would be the same as the Project. (Draft EIR, p. Q-17.)

Geology, Soils and Seismicity

Exposure of people and property to seismic hazards, such as groundshaking, lurch cracking, liquefaction, settlement, or expansive soils, were found as less than significant

because compliance with UBC and CBC would be required. This impact would be the same for Alternative 2 because it would be located on the same site as the Project. (Draft EIR, p. Q-17.)

The site development will occur in areas that can present geotechnical constraints that require special construction methods. Because the site is the same for the Project and Alternative 2, the risk of siting in areas that could present geotechnical constraints that require special construction methods would be the same for this alternative. (Draft EIR, pp. Q-17, Q-18.)

The site development will result in topographic alteration and soil disturbance, which can lead to increased erosion. Because the site is the same for Alternative 2, the risk of siting in areas that result in topographic alteration and soil disturbance that could lead to increased erosion would be the same for this alternative. However, the impact would be less severe than that of the Project because the reduced size of the developed area would result in less topographic alteration and soil disturbance. (Draft EIR, p. Q-18.)

The Project, in combination with buildout under the General Plan, will expose a greater number of people and property to seismic hazards such as seismic groundshaking, hazards associated with geologic or soils conditions, and potential effects of erosion. The impact would be the same as that of the Project, except that fewer people would be exposed to geologic and seismic hazards. Therefore, cumulative impacts related to seismic hazards and soils would be slightly less severe than for the Project. (Draft EIR, p. Q-18.)

Hydrology, Drainage and Water Quality

The Project can expose persons and structures to hazards associated with a 100-year flood event. Because no development would be sited in the floodplain under Alternative 2, the impact would be identical to that of the Project. (Draft EIR, p. Q-18.)

The Project will increase the rate and amount of stormwater runoff from newly created impervious surfaces, which can contribute to localized or downstream flooding. Use of the larger quarry as a detention basin will detain stormwater flows from the northern portion of the site to minimize any increase in downstream flooding. Alternative 2 would also increase the rate and amount of stormwater runoff from newly created impervious surfaces. However, the amount of impervious surface would be slightly less than with the Project because fewer residences would be constructed. (Draft EIR, p. Q-18.)

Grading, excavation, and construction activities associated with the Project can result in degraded water quality and/or increased deposition of sediment in Secret Ravine Creek, Sucker Ravine Creek, and pond areas on the Project site. These activities associated with Alternative 2 could result in degraded water quality and/or increased deposition of sediment in these areas. However, the amount of earthmoving activities would be less

than would occur with the Project because less development would occur. (Draft EIR, p. Q-19.)

Stormwater runoff from the Project can contain urban contaminants that could degrade water quality. Alternative 2 could also produce stormwater that would contain urban contaminants. However, the impact would be less severe than that of the Project because the impervious surface area would be less, resulting in less contaminated stormwater runoff. (Draft EIR, p. Q-19.)

Construction of the Project, in combination with other development that can occur within the Dry Creek Watershed, can affect receiving water quality. Alternative 2, in combination with other construction activities, could also affect receiving water quality, to a similar degree as the Project. The impact would be the same as that of the Project, but slightly less severe. (Draft EIR, p. Q-19.)

Increased impervious surfaces and urbanization associated with development of the Project, in combination with other development in the Dry Creek Watershed, can cumulatively increase urban contaminant loading, adversely affecting water quality. Implementation of mitigation measures will reduce this cumulative impact to a less-than-significant level. Alternative 2 would also require mitigation. However, the contribution would be slightly less than that of the Project because the amount of impervious surface would be less. (Draft EIR, p. Q-19.)

The Project, in combination with future development that can occur within the Dry Creek Watershed, can increase the rate and volume of stormwater runoff from newly created impervious surfaces. Alternative 2 would also produce stormwater that would contribute to this impact. However, the impact would be considered less severe than that of the Project because the impervious surface area would be less resulting in less stormwater runoff. (Draft EIR, pp. Q-19, Q-20.)

Biological Resources

The Project will result in the loss of native oak trees. The removal of approximately 1,159 healthy native oaks associated with development of residences, roadways, and trail. Under Alternative 2, the number of native oak trees to be removed would be less than would occur with the Project because fewer units would be constructed and a total of 37 acres would be left in undeveloped open space. (Draft EIR, p. Q-20.)

Development of the Project will result in disturbance and/or loss of natural habitat on the Project site, including loss of annual grassland, oak woodland and riparian habitats. A total of approximately 54.15 acres of habitat will be lost due to Project development. Under Alternative 2, there would still be a disturbance and/or loss of natural habitat. However, the amount of habitat lost would be reduced because overall fewer acres would be disturbed. (Draft EIR, p. Q-20.)

The Project will fill 0.488 acre of seasonal wetlands and other jurisdictional waters of the U.S. Under Alternative 2, a total of 37 acres would be set aside in undeveloped open space. It is anticipated that this open space would include the seasonal wetland located in the northeast corner of the Project site. The roadway system would be the same as that of the Project. Therefore, those wetland areas disturbed by the proposed internal roadway system would also be disturbed under this alternative. Alternative 2 would reduce the severity of the impact compared to the Project by reducing the total amount of seasonal wetlands to be filled, but mitigation would still be required. (Draft EIR, p. Q-20.)

Development of the Project can disturb nesting raptors. Under Alternative 2, there could still be a potential disturbance to nesting raptors due to construction activities. Although less of the site would be disturbed, there still could be an impact to nesting raptors and mitigation would still be required. (Draft EIR, pp. Q-20, Q-21.)

Development of the Project will remove elderberry shrubs, some of which may host the valley elderberry longhorn beetle (VELB). Under Alternative 2, removal of elderberry shrubs would still be required to accommodate development. It is not known if some shrubs could be avoided reducing the severity of this impact. It is anticipated that due to the addition of more open space areas fewer shrubs would be disturbed. (Draft EIR, p. Q-21.)

The Project will increase human activity adjacent to Secret Ravine Creek that can disturb migrating and rearing fall-run chinook salmon, and the federally-threatened Central Valley steelhead. Under Alternative 2, the total number of residential units would be decreased, so the level of human activity within the project site would be slightly decreased. (Draft EIR, p. Q-21.)

Development of the Project can increase sedimentation and pollution of Secret Ravine Creek and Dry Creek, which can degrade habitat for the fall-run chinook salmon and the Central Valley steelhead. Under Alternative 2, the total amount of construction would be less than would occur with the Project. The impact would be very similar to that of the Project, though slightly less severe. (Draft EIR, p. Q-21.)

Stormwater runoff from the Project can contain urban contaminants that can degrade water quality in Secret Ravine Creek and downstream drainages, degrading habitat for fall-run chinook and Central Valley steelhead. Under Alternative 2, the number of residential units is less than what will occur with the Project. However, runoff could still contribute urban contaminants that could degrade water quality in Secret Ravine Creek and downstream drainages. The impact would be the same as that of the Project, but slightly less severe. (Draft EIR, p. Q-21.)

Construction of the bridge across Secret Ravine Creek can affect special-status aquatic species. Under Alternative 2, the bridge would still be constructed and mitigation would still be required to reduce the impact to a less than significant level. (Draft EIR, pp. Q-21, Q-22.)

Construction of the Project, in combination with other development in the County, can contribute to the cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region. Under Alternative 2, the amount of residential development would be reduced and the amount of open space increased. A reduction in the loss of habitat would occur; however, more of the site would be undeveloped, leaving more habitat undisturbed. Under this alternative, a total of 37 acres of open space would be added. The impact would be slightly less severe compared to the Project, but it would still be a significant and unavoidable impact. (Draft EIR, p. Q-22.)

Construction of the Project, in combination with other development in this region, can contribute to the cumulative loss or deterioration of salmon and steelhead habitat and to the loss of aquatic resources in the region. Under Alternative 2, the impact would be less severe compared to that of the Project; however, mitigation measures would still be required. (Draft EIR, p. Q-22.)

Traffic and Circulation

Traffic associated with the Project will increase congestion on City of Rocklin roadways and intersections. There will be no significant impacts to bicycle or transit facilities. No significant impacts associated with the construction and operation for the first phase of development. Impacts on local streets, collector streets, and arterials will all be less than significant. (Draft EIR, p. Q-22.)

Under Alternative 2, a reduction of 30 dwelling units from the Project would result in a reduction of approximately 270 daily vehicle trips. The number of daily vehicle trips would decline from 1,071 under the Project to 801. This reduction in trips would result in lower numbers of vehicles on local roadways. However, the local roadways and intersections would operate at the same Level of Service (LOS) as they would under the Project. Impacts would be the same as those of the Project, but slightly less severe because fewer vehicles trips would result. Impacts on bicycle and transit facilities would be less than significant, the same as under the Project. (Draft EIR, p. Q-22.)

Air Quality

Construction activities associated with the Project will generate criteria air pollutants that will exceed Placer County APCD thresholds. Development of Alternative 2 would also generate criteria air pollutants during project construction, resulting in an impact similar to that of the Project, but slightly less severe. (Draft EIR, p. Q-23.)

Operation of the Project will result in a significant impact due to the generation of both vehicle and area source air pollutants, increasing total ROG emission levels above PCAPCD thresholds. Under Alternative 2, fewer residences would be developed, generating fewer vehicle trips than would occur under the Project. The reduction in the

number of vehicles, combined with mitigation measures, would be sufficient to ensure that the increase in ROG would not exceed the current PCAPCD threshold of 82 pounds per day. (Draft EIR, p. Q-23.)

Under the Project, there is the potential for pockets of woodsmoke to occur due to the use of fireplaces and woodstoves. Under Alternative 2, fewer homes would be developed and any increase in woodsmoke would be less than would occur with the Project, resulting in a less severe impact. (Draft EIR, p. Q-23.)

The Project will increase localized CO concentrations at some intersections. Alternative 2 would also increase localized CO concentrations at some intersections. However, because fewer vehicles would be generated by this alternative, it would slightly reduce the severity of this impact compared to that of the Project. (Draft EIR, pp. Q-23, Q-24.)

The Project, in combination with other cumulative development, will hinder the PCAPCD's ability to bring the region into attainment for Ozone and PM₁₀. Alternative 2, in combination with other cumulative development, would also contribute to this impact. However, this alternative's contribution to the impact would be smaller than that of the Project because of its lower ROG levels and generally lower pollutant contributions. (Draft EIR, p. Q-24.)

Noise

Construction of the Project will temporarily increase noise levels at existing noise-sensitive land uses. Alternative 2 would have a short-term construction noise impact similar to that of the Project, but it would be considered slightly less severe because less development would occur. (Draft EIR, p. Q-24.)

Operation of the Project will increase noise levels at existing noise-sensitive land uses located on- and off-site. Operation of Alternative 2 would also increase noise levels at existing on- and off-site noise-sensitive land uses. This impact would be slightly less severe because fewer residences would be developed and fewer vehicle trips generated. (Draft EIR, p. Q-24.)

Noise-sensitive land uses on the Project site will be exposed to existing noise from traffic. Under Alternative 2, residents would also be exposed to existing traffic noise. (Draft EIR, p. Q-24.)

Operation of the Project will increase noise levels on noise-sensitive land uses. Operation of Alternative 2 would also increase noise levels on noise-sensitive land uses. The impact would be considered slightly less severe due to the development of fewer units, which would collectively produce less operational noise. (Draft EIR, p. Q-24.)

Noise-sensitive land uses on the Project site will be exposed to future noise from traffic. Under Alternative 2, residents would also be exposed to future traffic noise. The impact would be slightly less severe because the amount of traffic on the project site would be reduced due to fewer vehicles generated by this alternative. (Draft EIR, p. Q-24.)

Public Services

Law Enforcement

The Project will increase a demand for law enforcement services in the City of Rocklin. In combination with future development in the City, it will create a demand for additional law enforcement services. Alternative 2 would also increase demand for law enforcement services in the City of Rocklin. Under this alternative, this impact would be slightly less severe due to the reduced size of this alternative and the smaller population (231 new residents vs. 309 for the Project) that would place less of a demand on law enforcement services. (Draft EIR, p. Q-25.)

Fire Protection and Emergency Services

The Project will increase demand for fire protection and emergency services. Alternative 2 would also increase a demand for fire protection and emergency services. Under this alternative, this impact would be slightly less severe due to its reduced size and subsequently smaller population that would place less of a demand on these services. (Draft EIR, p. Q-25.)

The Project can result in residences located beyond two miles from the closest fire station. Because the site is the same in Alternative 2, the impact would be the same as that of the Project. (Draft EIR, p. Q-25.)

Implementation of the Project can result in inadequate emergency access to the open space portions of the project site. Alternative 2 could also result in inadequate emergency access to the open space portions of the project site. However, because the site layout is the same, the impact would be identical to that of the Project. (Draft EIR, p. Q-25.)

The Project can result in development on steep slopes that can affect fire access. Under Alternative 2, the same area would be developed. The impact would essentially be the same as that of the Project, but slightly less severe because fewer residences would be developed. (Draft EIR, p. Q-25.)

The Project, in combination with future development in the City, will create demand for additional fire protection and emergency services. Under Alternative 2, the demand for fire protection and emergency services would increase. When combined with other development, Alternative 2's contribution to the impact would be slightly less severe due to its reduced size and subsequently smaller population that would place less of a demand on these services. (Draft EIR, p. Q-26.)

Schools

The Project can result in an increased demand for school services in the RUSD. In combination with future development in the City, it would increase the demand for school facilities. Alternative 2 would also increase demand for school services in the RUSD. This impact would be slightly less severe due to its reduced size and smaller population that would place less of a demand on schools. A total of 39 elementary age students, 10 middle school students and 16 high school age students would be generated under this alternative. (Draft EIR, p. Q-26.)

Parks

Implementation of the Project, in combination with other development in the City, will increase the demand for park facilities. Alternative 2 would also increase the demand for park facilities. This impact would be slightly less severe due to the reduced size of this alternative and a smaller population that would place less of a demand on parks. (Draft EIR, p. Q-26.)

Public Utilities

Water

The Project will result in an increased demand for water supply and treatment. Alternative 2 would also increase demand for water supply and treatment. This impact would be slightly less severe due to fewer residential units and a smaller population that would place less of a demand on water supply and treatment. A total of 102,350 gpd would be required for this alternative. (Draft EIR, p. Q-27.)

The Project will increase demand for water conveyance facilities. Alternative 2 would also increase demand for water conveyance facilities. This impact would be slightly less severe due to fewer residential units being developed and a smaller population that would place less of a demand on water conveyance facilities. (Draft EIR, p. Q-27.)

The Project, in combination with future development in the City and PCWA's service area, will increase the demand for water supply and treatment. Alternative 2 would also increase demand for water supply and treatment. This impact would be slightly less severe due to fewer residential units developed and a smaller population that would place less of a demand on water supply and treatment. (Draft EIR, p. Q-27.)

Wastewater

The Project will increase demand for wastewater conveyance. Mitigation requires that the project applicant work with the District, Placer County, and the City of Rocklin to incorporate a sewer crossing within the Monument Springs Bridge. Alternative 2 also

includes the bridge across Secret Ravine Creek and would also increase demand for wastewater conveyance. Mitigation would still be necessary to reduce this impact. (Draft EIR, p. Q-27.)

The Project will increase demand for wastewater treatment. Alternative 2 would also increase demand for wastewater treatment. This impact would be slightly less severe due to the reduced size of this alternative and a smaller population that would place less of a demand on wastewater treatment. A total of 35,600 gpd would be generated with the total required for treatment of 22,695 gpd. (Draft EIR, pp. Q-27, Q-28.)

The Project, in combination with future development in the City, will increase the demand for wastewater collection and treatment. Alternative 2 would also increase the demand for wastewater collection and treatment when combined with future City development. This impact would be slightly less severe due to the reduced size of this alternative and a smaller population that would place less demand on wastewater collection and treatment. (Draft EIR, p. Q-28.)

Solid Waste

Implementation of the Project will generate approximately 389 tons of solid waste on an annual basis. Alternative 2 would also generate solid waste. This impact would be slightly less severe due to the reduced size of this alternative and a smaller population that would produce less solid waste. A total of 291 tons of solid waste per year would be generated. (Draft EIR, p. Q-28.)

The Project will generate construction debris. Alternative 2 would also generate construction debris. This impact would be slightly less severe because the smaller size of this development would yield less construction debris. (Draft EIR, p. Q-29.)

The Project, in combination with future development in the City, will increase the demand for solid waste collection and disposal. Alternative 2 would also increase the demand for solid waste collection and disposal in combination with future development in the City. This alternative's contribution to the impact would be slightly less severe due to its reduced size and smaller population that would generate less solid waste. (Draft EIR, p. Q-29.)

Electrical and Natural Gas

The Project will increase demand for electrical and natural gas facilities and supply. In combination with future development in the City, it will increase the demand for electrical and gas services. Alternative 2 would also increase demand for electrical and natural gas facilities and supply. This impact would be slightly less severe due to the reduced size of this alternative and a smaller population that would place less of a demand on electricity and natural gas. (Draft EIR, p. Q-29.)

Cultural Resources

Implementation of the Project can damage or destroy unidentified historic and/or prehistoric resources. Alternative 2 would also have the potential to damage or destroy unidentified historic and/or prehistoric resources. However, it is anticipated that because less land would be disturbed, the impact would be slightly less severe than that of the Project. (Draft EIR, p. Q-29.)

Implementation of the Project (absent proper mitigation) could damage or destroy prehistoric resource CA-PLA-668. Under Alternative 2, the reduced-scale project could be situated on the site so as to avoid the above-mentioned prehistoric resource. (Draft EIR, p. Q-29.)

Construction of offsite infrastructure can damage or destroy undiscovered archeological and/or historic resources. Construction of offsite infrastructure for Alternative 2 would also have the potential to damage or destroy unidentified historic and/or prehistoric resources. This impact would be the same as the Project. (Draft EIR, pp. Q-29, Q-30.)

The Project is consistent with the City of Rocklin General Plan policies regarding cultural resources. Because Alternative 2 would develop a similar project and would comply with City policies, this alternative would also be consistent with the City of Rocklin General Plan policies regarding cultural resources. This impact would be identical to that of the Project. (Draft EIR, p. Q-30.)

Cumulative development in the Secret Ravine watershed, in conjunction with development of the Project, can contribute incrementally to the regional loss of cultural resources in Placer County. Alternative 2 could also contribute to regional loss of cultural resources. Due to its reduced impact on identified prehistoric and historic resources, its contribution to this cumulative impact would be less severe than that of the Project. (Draft EIR, p. Q-30.)

Public Safety and Hazards

Construction and occupancy of the Project can result in the use, generation, storage, and disposal of hazardous materials within the project site. Under this alternative, construction and occupancy could also result in the use, generation, storage, and disposal of hazardous materials within the project site. However, due to the reduced size of the project, the amount of hazardous use, storage, and disposal associated with project operation would be reduced. (Draft EIR, p. Q-30.)

Development of the Project site can expose construction workers and the public to unknown contaminated soil and/or groundwater. Construction of Alternative 2 could also expose construction workers and the public to unknown contaminated soil and/or groundwater. However, the impact would be slightly less severe because fewer construction workers would potentially be exposed. (Draft EIR, p. Q-30.)

Development of the Project will occur around two granite quarries, potentially exposing the public and the environment to physical hazards. Development of Alternative 2 would also occur around the two granite quarries, and could potentially expose the public and the environment to physical and chemical hazards. However, the impact would be slightly less severe than the Project because fewer residents could be exposed. (Draft EIR, pp. Q-30, Q-31.)

The Project occupants can be exposed to hazards associated with rattlesnakes. Alternative 2 would also potentially expose occupants to rattlesnake hazards. This impact would be less severe than that of the Project because fewer residents would potentially be exposed to rattlesnakes. (Draft EIR, p. Q-31.)

Implementation of the Project will increase the potential for wildland fires. Alternative 2 would also increase the potential for wildland fires. This impact would be identical to that of the Project. (Draft EIR, p. Q-31.)

Implementation of the Project, in combination with other development, will increase the number of people exposed to additional safety hazards and hazardous materials. Alternative 2 would also increase the number of people exposed to additional safety hazards and hazardous materials. However, due to the smaller population associated with this reduced-scale alternative, this cumulative impact would be slightly less severe than that associated with the Project. (Draft EIR, p. Q-31.)

Development of the Project, in combination with other development, can expose more people to risks associated with wildland fires. Under Alternative 2, the impact would be the same, but slightly less severe. (Draft EIR, p. Q-31.)

Relationship of the Reduced Units and Expanded Open Space Alternative to the Project Objectives; Infeasibility of Alternative

The Reduced Units and Expanded Open Space Alternative would meet most of the objectives of the project by: increasing the City's housing supply in close proximity to existing transportation corridors and employment centers; designing a residential development that is consistent with the City's land use designation and zoning for the site and compatible with existing nearby neighborhoods; providing residential uses in an area contiguous to existing development and providing required infrastructure; preserving Secret Ravine and protecting other significant onsite natural resources through appropriate project design; constructing planned roadway improvements (bridge) specified in the City's Circulation Element Update – Southeast Rocklin Area; and using existing onsite drainage features to detain project flows, thereby minimizing post-development surface runoff. Compared to the Project, Alternative 2 would be very similar because it would meet the intent of the project objectives. (Draft EIR, pp. Q-31, Q-32.)

Nevertheless, Alternative 2 is both legally and financially infeasible. As noted earlier, California law does not permit the City, under present circumstances, to reduce the number of units in the 119-unit project as proposed by the applicant. Government Code section 65589.5, subdivision (j), imposes severe constraints on a local government's ability to deny or reduce the density of any "housing development project" that complies with applicable "general plan and zoning standards and criteria[.]" Such a denial or density reduction is legally permissible only where a city or county decisionmaking body can make written findings identifying substantial evidence showing that such action is necessary to avoid a "specific, adverse impact upon the public health and safety[.]" Here, because the Project complies with all relevant general plan and zoning standards and criteria, and does not cause any adverse effects on public health and safety, the City is required by law to approve the Project as proposed. (See *Sequoyah Hills*, *supra*, 23 Cal.App.4th at p. 715.)

Furthermore, the applicant has submitted substantial evidence and expert testimony indicating that an alternative with only 89 units *and* the bridge over Secret Ravine Creek at Monument Springs Drive. In a lengthy letter dated November 19, 2001, counsel for the applicant explained why such an alternative simply cannot work from a financial standpoint. Based on supporting evidence, he explained why the per-lot improvement costs that would occur under the alternative would be prohibitively high. He emphasized that, regardless of how much money Alleghany or any successor puts into improvements on the Project site, finished lots for the Project as proposed will sell wholesale for no more than about \$90,000 to \$97,000 per finished lot. Alternative 2, however, would require "hard costs" of \$105,000 per lot. This figure not only significantly exceeds – by more than \$15,000 per lot – the post-September 11, 2001, estimated per-unit wholesale price of \$89,571; it also significantly exceeds – by more than \$8,000 per lot – the \$96,714 per lot figure reflecting conditions prior to September 11, 2001. (See Letter from Jim Moose to Sherri Abbas, November 19, 2001.) It is plain that, where the costs to ready the lots for sale far exceeds the amount of money than can be recouped through such sales, a proposed land use plan (here, Alternative 2) is financially infeasible.

Alternative 3: Reduced Density Alternative

Under the Reduced Density Alternative, a total of 80 units would be developed at a density of 1 unit per acre, resulting in a reduction of 39 dwelling units from what was assumed under the Project. For this Alternative, it is assumed that the amount of open space and internal (on-site) infrastructure would be the same as those planned for the Project. However, the Monument Springs Drive extension and bridge over Secret Ravine would not be built. This alternative would generate a population of approximately 208 residents. (Draft EIR, p. Q-32.)

Land Use

Under the Project, impacts associated with consistency with the City's General Plan and compatibility with existing and planned uses were determined to be less than significant. Under Alternative 3, the site would be developed with a total of 80 units, a reduction of 39 units from the Project. This alternative includes the same amount of open space, on-site roadway infrastructure, and infrastructure as the Project. However, under this alternative, Monument Springs Drive would not be extended and the bridge would not be built across Secret Ravine Creek. Under this alternative, the impacts would be the same as those identified for the Project. (Draft EIR, p. Q-32.)

Visual Resources

The Project will change the character of the project site. Alternative 3 would also involve developing the site with residences, similar to what would occur with the Project. Under this alternative, the character of the site would be changed, as would occur with the Project, but because fewer units would be developed at a lower density, the impact would be less severe. (Draft EIR, p. Q-32.)

The Project will be visually compatible with existing and planned residential uses. Alternative 3 includes developing the same type of project as the Project, but with fewer residences and at a lower density. Because the same type of uses would be developed as the Project, the impact would be identical to the Project. (Draft EIR, p. Q-32.)

The introduction of nighttime lighting can increase light and glare in the area. Alternative 3 includes developing essentially the same project as the Project, including the same internal roadway system, but overall fewer units would be developed at a lower density and the bridge and road extension would not be built. The impact would be less severe because overall less nighttime lighting would result. (Draft EIR, pp. Q-32, Q-33.)

The Project will contribute to a cumulative change in visual character and contribute to a cumulative increase in light and glare. Under Alternative 3, the Project would change the visual character of the site because it would be developed and it would introduce light and glare into the area. The cumulative impact would be less severe than the Project because overall less development would occur. (Draft EIR, p. Q-33.)

Population, Employment and Housing

The Project will result in an increase in population, change in the City's jobs/housing balance, and consistency with the City's General Plan policies. Under Alternative 3, there would be a total of 80 units developed, which would increase the population in the City by approximately 208 residents. The increase in population and change in the City's jobs/housing balance would be very similar to the Project. The impacts would be the same as the Project. Alternative 3 would not conflict with the City's General Plan policies. However, because fewer residents would be generated under this alternative, the

overall impact would be slightly less severe than that of the Project. (Draft EIR, p. Q-33.)

Geology, Soils and Seismicity

The Project will result in exposure of people and property to seismic groundshaking on a project-specific level and a cumulative level. Under Alternative 3, this impact would be the same as the Project. However, because fewer residents and structures would be affected, the impact is less severe. (Draft EIR, p. Q-33.)

Development of the Project site can occur in areas underlain with shallow or exposed bedrock. Implementation of Alternative 3 would also require development of the Project site in areas that could include shallow or exposed bedrock. Under this alternative, the impact would be identical to the Project. (Draft EIR, p. Q-33.)

The Project can potentially alter site topography and affect the rate or extent of erosion. Development of the project site would occur under Alternative 3, but more areas would be left undisturbed because the lot sizes would be larger and the bridge and road extension would not be included. Development would still alter the site topography and affect the rate and extent of erosion. However, the impact would be slightly less severe than that of the Project because overall less disturbance would occur. (Draft EIR, pp. Q-33, Q-34.)

Hydrology, Water Quality and Flooding

The Project can expose people to flood hazards and will increase the rate and amount of stormwater runoff from newly created impervious surfaces, which can contribute to localized or downstream flooding. These impacts can degrade water quality in Secret Ravine Creek. None of the developed areas of the project site are located within the 100-year floodplain. The trail to be constructed in the open space area along Secret Ravine Creek very minimally encroaches upon the 100-year floodplain. Use of the larger quarry as a detention basin will detain stormwater flows from the northern portion of the site to minimize any increase in downstream flooding and construction activities will be required to comply with BATs/BMPs that will reduce any impacts associated with increased erosion. Under Alternative 3, development would occur, but would be less dense than would occur with the Project. However, development of this alternative would still increase the rate and amount of stormwater runoff from newly created impervious surfaces, which could contribute to localized or downstream flooding and increase sediment that could degrade water quality in Secret Ravine Creek. The same as with the Project, impacts under this alternative would be less than significant and would not require special mitigation. However, because less area would be developed and Monument Springs Drive would not be constructed, the impact would be considered slightly less severe. (Draft EIR, p. Q-34.)

Under the Project, stormwater runoff can contain urban contaminants. Under Alternative 3, development of roadways and driveways could also contribute urban contaminants that would runoff during the rainy season. However, because less development would occur, the impact would be considered slightly less severe. (Draft EIR, p. Q-34.)

Under the Project, the cumulative impact of construction activities can affect water quality in Secret Ravine Creek. The Project can also result in the cumulative increase in impervious surfaces resulting in more urban contaminants affecting water quality and the cumulative increase in the rate and volume of stormwater runoff. Under Alternative 3, cumulative impacts would be the same as those of the Project. However, the impacts would be slightly less severe because overall less construction would result. (Draft EIR, pp. Q-34, Q-35.)

Biological Resources

Under Alternative 3, native oak trees would be impacted by project development similar to the Project. Under the Project, a total of 1,159 healthy oak trees will be removed. However, under Alternative 3, there would be fewer native oaks removed because the total lot sizes would be larger, leaving more area undisturbed. (Draft EIR, p. Q-35.)

Construction of the bridge over Secret Ravine Creek and the extension of Monument Springs Drive would not occur under Alternative 3. There would be no impact associated with construction of this roadway because the roadway is not extended and the bridge is not constructed. (Draft EIR, p. Q-35.)

A total of approximately 54.15 acres of habitat will be lost due to project development under the Project. Under Alternative 3, there would still be a disturbance and/or loss of natural habitat due to project development, similar to the Project. However, the amount of habitat lost would be reduced compared to the Project because less land would be disturbed. (Draft EIR, p. Q-35.)

The Project will fill 0.488 acres of seasonal wetlands and other jurisdictional waters of the United States. Under Alternative 3, it is anticipated that wetlands would still be impacted by project development because the roadway system would be the same. However, by implementing a deed restriction to not develop residences on the small seasonal wetland area located in the northeast corner of the project site, the impact to wetlands would be slightly less severe than that of the Project. (Draft EIR, p. Q-35.)

Development of the Project can disturb nesting raptors. Under Alternative 3, even with fewer residential units developed, there would still be a potential disturbance to nesting raptors. (Draft EIR, pp. Q-35, Q-36.)

Development of the Project will remove elderberry shrubs, some of which may host the valley elderberry longhorn beetle (VELB). Under Alternative 3, removal of elderberry shrubs would still be required. However, because the lot sizes are larger, it is anticipated some shrubs could be avoided. (Draft EIR, p. Q-36.)

The Project will increase human activity adjacent to Secret Ravine Creek that can disturb migrating and rearing fall-run chinook salmon, and the federally-threatened Central Valley steelhead. Under Alternative 3, fewer residential units would be constructed and fewer residents would be generated by the project; therefore, the impact would be less severe compared to that of the Project. (Draft EIR, p. Q-36.)

Development of the Project can increase sedimentation and pollution of Secret Ravine Creek and Dry Creek, which can degrade habitat for the fall-run chinook salmon and the Central Valley steelhead. Under Alternative 3, fewer units would be constructed. The impact would be the same as the Project, but slightly less severe because overall less construction would occur. (Draft EIR, p. Q-36.)

Under the Project, stormwater runoff from the Project can contain urban contaminants that can degrade water quality in Secret Ravine Creek and downstream drainages, degrading habitat for fall-run chinook and Central Valley steelhead. Under Alternative 3, even though fewer residences would be constructed, stormwater runoff could still contain contaminants. However, the impact would be less severe than that of the Project. (Draft EIR, p. Q-36.)

Construction of the bridge across Secret Ravine Creek could affect special-status aquatic species. Under Alternative 3, the bridge would not be constructed, so no impact would occur. (Draft EIR, p. Q-36.)

Construction of the Project, in combination with other development in the County, can contribute to the cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region. Under Alternative 3, even though fewer residences would be constructed, large amounts of habitat would still be disturbed. Therefore, the impact would be the same as that of the Project, but slightly less severe because overall less construction would occur. (Draft EIR, p. Q-37.)

Construction of the Project, in combination with other development in this region, can contribute to the cumulative loss or deterioration of salmon and steelhead habitat and to the loss of aquatic resources in the region. Under Alternative 3, the bridge would not be constructed, so the impact would be less severe compared to the Project. (Draft EIR, p. Q-37.)

Transportation/Circulation

Under the Project, traffic associated with the project will increase congestion on city of Rocklin roadways and intersections. There will be no significant impacts to bicycles or transit facilities. Phase I of the Project will not result in any significant impacts. Under cumulative conditions, impacts to local streets, collector streets, or arterials will be less than significant. (Draft EIR, p. Q-37.)

Under Alternative 3, a reduction of 39 dwelling units from the Project would result in a reduction of 351 daily vehicle trips. The number of daily vehicle trips would decline from 1,071 under the Project to 720 under this alternative. This reduction in trips would result in lower numbers of vehicles on local roadways. The local roadways and intersections would operate at the same Level of Service (LOS) under this alternative as they would under the Project. However, because the bridge would not be constructed and Monument Springs Drive would not be extended, it is assumed a majority of trips would use Aguilar Road to access the site. Currently Aguilar Road is not designed to current roadway standards and would need to be improved to accommodate trips associated with buildout of the project. It is anticipated that improvements to this road would result in short-term construction impacts (e.g., noise, air quality). In addition, the widening of this roadway may also result in impacts to adjacent homes and/or driveways which are located within any right-of-way needed to widen the road. Therefore, under this alternative, impacts associated with traffic would be more severe than those of the Project. Impacts on bicycle facilities and transit would be the same as under the Project. (Draft EIR, p. Q-37.)

Air Quality

Emissions associated with project construction will generate criteria air pollutants that will exceed Placer County APCD standards. Under Alternative 3, construction activities would also occur. Because fewer units would be developed under this alternative compared to the Project, the impact would be slightly less severe than that of the Project. (Draft EIR, p. Q-38.)

The Project will result in emissions associated with project operation. Under Alternative 3, because fewer units would be developed and fewer cars would be accessing the site, the overall emissions associated with project operation would be slightly less severe compared to those of the Project. (Draft EIR, p. Q-38.)

Operation of the Project can result in pockets of woodsmoke. Under Alternative 3, because fewer residences would be developed, the impact would be less than significant, but considered slightly less severe compared to that of the Project. (Draft EIR, p. Q-38.)

Although project-related traffic will contribute to local CO emissions under the Project, these emissions will not exceed state or federal standards. Under Alternative 3, project-related traffic would be less than that of the Project. (Draft EIR, pp. Q-38, Q-39.)

Project emissions, in combination with other development in the air basin, can interfere with achievement of the air district attainment goals for ozone and PM₁₀. Alternative 3 would result in the contribution of fewer cars compared to the Project. However, the cumulative contribution would still be considered significant but less severe because fewer vehicles would be generated by the project resulting in a slight decline in ROG emissions. (Draft EIR, p. Q-39.)

Noise

Under the Project, construction activities will temporarily increase noise levels at existing noise-sensitive land uses. Development would still occur under Alternative 3 and construction noise would result in a temporary increase in noise levels at existing noise-sensitive uses. However, because fewer units would be developed, the overall amount of construction would be less. (Draft EIR, p. Q-39.)

The Project will result in noise from project operation and potential impacts to uses both on and off the project site, increase in traffic noise associated with project operation, and the increase in future noise levels associated with project traffic. Under Alternative 3, the impacts would be the same as the Project. Noise levels could be slightly less because Monument Springs Drive would not be extended, and fewer vehicles would be generated by this alternative, resulting in a less severe impact. (Draft EIR, p. Q-39.)

Public Services

Law Enforcement

Under the Project, there can be an increased demand on police services and additional demands on police protection services created by cumulative development in the City of Rocklin. Under Alternative 3, fewer residents (208 vs. 309) would be generated compared to the Project. Therefore, the demand on police services, both on a project-specific and cumulative level, would remain less than significant, but would be considered slightly less severe than those of the Project. (Draft EIR, pp. Q-39, Q-40.)

Fire Protection and Emergency Services

The Project will increase the demand for fire protection and emergency services and include impacts associated with response time and emergency access (i.e. development in areas with steep slopes). There will be additional demands on fire protection and emergency services created by cumulative development in the City of Rocklin. Under Alternative 3, the demand for fire protection and emergency services would be slightly less than that of the Project because fewer residents would be generated. Therefore, the

impact would be slightly less severe than that of the Project. Impacts associated with the availability of adequate water for fire flows, and access for emergency purposes, would be the same as those of the Project. (Draft EIR, p. Q-40.)

Schools

The Project will increase the number of school-age children. Under the Project, a total of 48 elementary students, 12 middle school students and 18 high school students will be generated. However, there is adequate capacity in either existing or planned schools to accommodate the Project. There will be additional demands on school facilities created by cumulative development in the City of Rocklin. Under Alternative 3, fewer students would be generated because the project is smaller. A total of 35 elementary students, 9 middle school students and 14 high school students would be generated. Adequate capacity would be available to accommodate these students. Because fewer students would be generated, the impact is considered slightly less severe compared to that of the Project. (Draft EIR, p. Q-40.)

Parks

The Project will increase the demand for park facilities. The project does not include any active parks, only passive open space. Under Alternative 3, the same amount of open space would be provided as would occur with the Project. No active parks would be included under this alternative. It is anticipated that a fee would be contributed to the City for the purchase and construction of active park facilities in other areas of the city. Therefore, even though fewer residents would be generated, the impact is proportionally the same as that of the Project. (Draft EIR, p. Q-40.)

Public Utilities

Water

Under the Project, the demand for water supply and treatment will increase; however, adequate water supplies and treatment capacity are available to serve the project site. A total of 136,850 gpd will be required to serve the Project. Under Alternative 3, a total water demand of 92,000 gpd would be required. Because less water would be required, the impact is considered slightly less severe compared to that of the Project. (Draft EIR, p. Q-41.)

Construction of the new water distribution system will be done in compliance with PCWA's standards, which will ensure that the Project's infrastructure is adequately sized and connected to PCWA's system. Alternative 3 would also increase demand for water conveyance facilities; however, this impact would be slightly less severe due to fewer residential units being developed and a smaller population that would place less of a demand on water conveyance facilities. In addition, under this alternative, no infrastructure would be tied into the existing 12-inch line at the intersection of Monument

Springs Drive and Hidden Glen Drive. The only water connection would be to the 8-inch line in Greenbrae Drive. Therefore, the impact would be similar to that of the Project; however, an additional water connection may be required to serve the project, which could result in additional impacts. (Draft EIR, pp. Q-41, Q-42.)

The Project's increased water demand will increase Citywide demand for water. This increase, in conjunction with cumulative development in the City of Rocklin and PCWA's service area, was found to be a less-than-significant impact. Overall Alternative 3 would generate a demand for less water than the Project. Therefore, the impact would be less than significant, the same as with the Project, but slightly less severe because less water would be needed. (Draft EIR, p. Q-42.)

Wastewater

The Project will increase the City's population and will result in increased wastewater flows and need for wastewater conveyance and treatment. Under the Project, a total of 0.047 mgd of wastewater will be generated. Under Alternative 3, a total of 0.032 mgd of wastewater would be generated. The impact would be less than significant, the same as with the Project, but slightly less severe because less wastewater would be generated under this alternative. (Draft EIR, p. Q-42.)

A sewer trunk line currently crosses a portion of the project site. However, there is no wastewater infrastructure currently serving the property, so new connections to the WWTP will be constructed to serve the Project. Under Alternative 3, the same on-site infrastructure would be developed to serve the project, but there would be no sewer line connection across Secret Ravine Creek because the bridge would not be constructed under this alternative. The sewer lines for the project would tie into the existing trunk line that transects the site. The temporary lift station would remain under this alternative. (Draft EIR, p. Q-42.)

The project, in combination with other development in the City, will increase demand for wastewater collection and treatment. Under Alternative 3, because fewer residences would be constructed, the cumulative impact would remain less than significant, but would be considered slightly less severe compared to the project. (Draft EIR, p. Q-42.)

Solid Waste

The Project will generate a total of approximately 369 tons per year of solid waste. Adequate capacity is available at the landfill to accommodate this increase. The cumulative contribution also determined that the impact will be less than significant. Under Alternative 3, a total of 262 tons per year of solid waste would be generated. Because adequate capacity is available at the landfill to accommodate this increase, the impact would remain less than significant. However, because the total amount of solid waste generated is less than would occur with the Project, the impact is considered slightly less severe. (Draft EIR, p. Q-43.)

In addition to solid waste generated after the Project is completed, there will be an increase in solid waste during project construction. There is adequate capacity at the landfill to accommodate this additional waste. Under Alternative 3, the overall amount of construction debris generated would be less than with the Project because fewer units are proposed. The impact would be less than significant, the same as with the Project. (Draft EIR, p. Q-43.)

Natural Gas and Electrical Services

Under the Project, the project-specific and cumulative impacts to natural gas and electrical services will be less than significant because new development will be responsible for the costs associated with the necessary expansion and upgrading of the systems. The impact would be the same for Alternative 3; however, because fewer residents would be generated, the impact would be slightly less severe than that of the Project. (Draft EIR, p. Q-44.)

Cultural Resources

The Project can damage or destroy unidentified historic and/or prehistoric resources. Under Alternative 3, the site would also be disturbed, which could result in damage to any unidentified resources. However, because less area would be disturbed, the impact would be slightly less severe. (Draft EIR, p. Q-44.)

Development of the Project will disturb identified resources on the project site. Under Alternative 3, there is the potential for those resources identified on the project site to be disturbed during project construction. However, because the lots would be larger, it is possible that impacts to resource CA-PLA-668 would be mitigated through avoidance. (Draft EIR, p. Q-44.)

Development of off-site infrastructure can damage or destroy any unidentified resources. Under Alternative 3, the road and bridge would not be constructed. (Draft EIR, p. Q-44.)

The Project is consistent with the City of Rocklin's General Plan policies. Alternative 3 would also be consistent with the City's goals and policies. (Draft EIR, p. Q-44.) Alternative 3 would not help implement the City's goal of building the bridge over Secret Ravine Creek and Monument Springs Drive, however. In this respect, the Project, which would include affirmative steps to fund and facilitate bridge construction, is more compatible with the General Plan than Alternative 3 would be. (See *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 378-380.)

Development of the Project, in combination with other development in the Secret Ravine watershed, will contribute to the cumulative loss of cultural resources in the County. Under Alternative 3, less area would be disturbed than the Project and the potential for resource CA-PLA-668 to be preserved is an option. However, because there is the

possibility of any unknown resources to be disturbed, the impact would be less severe but would remain significant and unavoidable. (Draft EIR, p. Q-44.)

Public Safety and Hazards

Construction and occupancy of the Project was determined not to result in a significant impact, because existing state and federal laws highly regulate the use of hazardous materials. However, development of the site can expose future occupants and construction workers to localized soil or groundwater contamination. Under Alternative 3, development of the site would still expose workers and project occupants to soil or groundwater exposure. However, because fewer construction workers and project occupants could potentially be exposed, the impact is considered less severe. (Draft EIR, p. Q-45.)

Development of the site can expose project occupants and the public to physical hazards associated with the two granite quarries located on the project site. Under Alternative 3, project occupants and the public would also be exposed to the physical hazards associated with the two quarries. As with the Project, mitigation would still be required to reduce the impact. However, because fewer project occupants would be exposed to hazards, the impact is considered less severe. (Draft EIR, p. Q-45.)

The Project will result in exposure of project residents to rattlesnakes. The project development can increase the potential for wildland fires. The Project, in combination with other development, will increase the number of people exposed to safety hazards and hazardous materials. Hazards associated with wildlands fires can occur. Under Alternative 3, public safety impacts would be less severe because fewer residents would be exposed. The exposure of project occupants to rattlesnakes would not change from what was analyzed under the Project. However, fewer residents would potentially be exposed to rattlesnakes. The potential for wildland fires would essentially be the same as the Project; however, because the individual lots would be larger, there would be the possibility for more untended brush to be present. This could increase the risk of wildland fires due to the presence of more fuel. (Draft EIR, p. Q-45.)

Relationship of the Reduced Density Alternative to the Project Objectives; Infeasibility of Alternative

Alternative 3 would increase the City's housing supply, though by a lesser amount than the Project. This alternative would develop a residential development consistent with the City's land use and zoning designations of the project site and would develop a residential area contiguous to existing development and infrastructure. Similar to the Project, the Reduced Density Alternative would preserve an area of Secret Ravine, construct some planned roadway improvements, and use existing onsite drainage features for stormwater runoff. Alternative 3, however, would not construct the bridge across Secret Ravine Creek or extend Monument Springs Drive. (Draft EIR, pp. Q-45, Q-46.)

Alternative 3 is infeasible for three separate but related reasons. First, Government Code section 65589.5, subdivision (j), does not permit the City, under the present circumstances, to reduce the density of any "housing development project" that complies with applicable "general plan and zoning standards and criteria[.]" Such a density reduction is legally permissible only where a city council can make written findings identifying substantial evidence showing that such action is necessary to avoid a "specific, adverse impact upon the public health and safety[.]" Here, because the Project complies with all relevant general plan and zoning standards and criteria, and does not cause any adverse effects on public health and safety, the City is required by law to approve the Project as proposed. (See *Sequoyah Hills, supra*, 23 Cal.App.4th at p. 715.) Second, Alternative 3 fails to meet an important project objective: facilitating the construction of the Monument Springs Drive bridge over Secret Ravine, a facility identified in the City's General Plan. This fact, by itself, permits the City Council to conclude that the alternative is infeasible. (See *City of Del Mar, supra*, 133 Cal.App.3d at p. 417; see also *Sequoyah Hills, supra*, 23 Cal.App.4th at p. 715.) And third, the City believes that an expansion of Aguilar Road – necessary for Alternative 3 – would entail unacceptable impacts to the residents adjoining the road. As noted earlier, Aguilar Road is not designed to current roadway standards and would need to be improved to accommodate trips associated with buildout of Alternative 3. The improvements necessary to increase capacity would not only result in short-term construction impacts, but would also result in impacts to adjacent homes and/or driveways located within the right-of-way that would be needed for the required widening. Notably, the Placer County Department of Public Works has expressed concern about the potential impacts of widening Aguilar Road. (See Draft EIR, vol. 2 (Appendices), Appendix A, Letter from William H. Moore, P.E., to Sherri Abbas.)

Alternative 4: No Monument Springs Drive Extension Alternative

Under Alternative 4, the project site would be developed as currently designed, except that Monument Springs Drive would not be extended to connect to the project site. Therefore, no bridge across Secret Ravine would be constructed. Under this alternative, the same number of residents would be generated as under the Project. For this analysis, it is assumed that the roadway system, and infrastructure within the project site would be the same as those planned for the Project; therefore, the impacts would be the same except where noted. However, under this alternative, Aguilar Road would remain open to accommodate project traffic and Greenbrae Road would not be extended to Sierra College Boulevard. (Draft EIR, p. Q-46.)

Land Use

Under this alternative, the land use impacts would be identical to those of the Project. (Draft EIR, p. Q-46.)

Visual Resources

Alternative 4 would be designed and located identically to the Project, with the exception of the Monument Springs Drive Extension and the bridge. Therefore, the project-specific and cumulative impacts would be similar to the Project but slightly reduced because tree removal due to the road extension and bridge would not occur. (Draft EIR, p. Q-46.)

Population, Employment, and Housing

Alternative 4 would result in an identical population increase to the Project; therefore, the project-specific and cumulative population, employment and housing impacts would be identical to those of the Project. (Draft EIR, p. Q-46.)

Geology, Soils and Seismicity

Because Alternative 4 is identical to the Project, with the exception of not connecting Monument Springs Drive to the project site, all of the geology, soils, and seismicity impacts would be identical to those of the Project. (Draft EIR, p. Q-46.)

Hydrology, Drainage and Water Quality

Under Alternative 4, the hydrology, drainage, and water quality impacts would be identical to those of the Project. However, because slightly less impervious surface area would be created (no roadway bridge), impacts associated with increased erosion affecting water quality and the contribution of hazardous materials from vehicles affecting water quality would be less severe under this alternative. (Draft EIR, pp. Q-46, Q-47.)

Biological Resources

Under Alternative 4, the proposed residential development would remain the same; therefore, the native oaks impacted under the Project would still be impacted. However, by not extending Monument Springs Drive, the 25 native oaks, originally intended to be removed under the Project, would not be removed. Therefore, this alternative would have a reduced impact on native oaks compared to the Project. (Draft EIR, p. Q-47.)

Under this alternative, less area would be disturbed resulting in a less severe impact to habitat and wildlife. There would be no change in impacts to elderberry shrubs because no shrubs were located in this proposed roadway alignment. Because no trees would be removed associated with the road extension and bridge construction, the impact to raptors would also be less severe. Impacts associated with project construction would be reduced because the bridge and road would not be constructed. Also, any potential increase in sedimentation associated with project construction would be minimized because the bridge and roadway would not be constructed. (Draft EIR, p. Q-47.)

Impacts identified under the Project associated with construction of the bridge would not occur under Alternative 4. Overall, biological impacts would be less severe under this impact because less disturbance to the environment would occur. (Draft EIR, p. Q-47.)

Traffic and Circulation

All traffic impacts associated with the Project would remain the same. The elimination of the Monument Springs Drive extension and bridge and the elimination of the Aguilar Road closure would shift project trips and some other trips from China Garden Road to Aguilar Road. The impact would be an increase in vehicles on Aguilar Road south of China Garden Road and a decrease in vehicles on China Garden Road. Aguilar Road south of China Garden is a local residential roadway and would have traffic volumes increased to higher than 2,500 daily vehicle trips, representing a significant impact. In addition, due to the substandard condition of Aguilar Road, the roadway would need to be improved under this alternative, resulting in potential impacts to adjacent residences. Traffic impacts would be more severe under this alternative as compared to those of the Project. (Draft EIR, p. Q-47.)

Air Quality

Under Alternative 4, the amount of air emissions generated would be the same as with the Project with the exception of construction-related emissions. Overall, the total amount of construction emissions would be reduced because the roadway connection would not be constructed. However, all project-related operational emissions would not change and would be the same as those associated with the Project. (Draft EIR, p. Q-47.)

Noise

Noise generated by construction activities would be reduced under Alternative 4 because less construction would occur. Therefore, impacts associated with construction noise would be less severe under this alternative. Under Alternative 4, noise generated by project operation, as well as the number of residents exposed to existing noise sources, would be the same as the Project. (Draft EIR, p. Q-48.)

Public Services

Under Alternative 4, project-specific and cumulative impacts to law enforcement, fire services, schools, and parks would be identical to those of the Project. (Draft EIR, p. Q-48.)

Public Utilities

Under Alternative 4, project-specific and cumulative impacts to water supply and treatment, wastewater treatment and conveyance, and electrical and natural gas resources would be identical to those of the Project. However, because less construction would be required under this alternative, the amount of solid waste generated would be less. Therefore, impacts to solid waste would be slightly less severe. (Draft EIR, p. Q-48.)

Cultural Resources

Under Alternative 4, the same area would be disturbed with the exception of the Monument Springs Drive extension. Under Alternative 4, impacts on cultural resources would be slightly less severe compared to those of the Project. (Draft EIR, p. Q-48.)

Public Safety and Hazards

Under Alternative 4, the impacts for public safety and hazards would be slightly less severe because overall less construction would be required and less area disturbed. Therefore, the impacts would be slightly less severe compared to those of the Project. (Draft EIR, p. Q-48.)

Relationship of the No Monument Springs Drive Extension Alternative to the Project Objectives; Infeasibility of Alternative

The No Monument Springs Drive Extension Alternative would meet the objectives of the project by: increasing the City's housing supply in close proximity to existing transportation corridors and employment centers; designing a residential development that is consistent with the City's land use designation and zoning for the site and compatible with existing nearby neighborhoods; providing residential uses in an area contiguous to existing development and financing required infrastructure; preserving Secret Ravine and protecting other significant onsite natural resources through appropriate project design; and using existing onsite drainage features to detain project flows, thereby minimizing post-development surface runoff. This alternative would not meet the project objective of constructing planned roadway improvements (bridge) specified in the City's Circulation Element Update – Southeast Rocklin Area. (Draft EIR, p. Q-48.)

Alternative 4 is infeasible for two separate but related reasons. First, Alternative 4 fails to meet an important project objective: facilitating the construction of the Monument Springs Drive bridge over Secret Ravine, a facility identified in the City's General Plan. This fact, by itself, permits the Council to conclude that the alternative is infeasible. (See *City of Del Mar, supra*, 133 Cal.App.3d at p. 417; see also *Sequoyah Hills, supra*, 23

Cal.App.4th at p. 715.) Second, the City believes that an expansion of Aguilar Road – necessary for Alternative 4 – would entail unacceptable impacts to the residents adjoining the road. As noted earlier, Aguilar Road is not designed to current roadway standards and would need to be improved to accommodate trips associated with buildout of Alternative 4. The improvements necessary to increase capacity would not only result in short-term construction impacts, but would also result in impacts to adjacent homes and/or driveways located within the right-of-way that would be needed for the required widening. Notably, the Placer County Department of Public Works has expressed concern about the potential impacts of widening Aguilar Road. (See Draft EIR, vol. 2 (Appendices), Appendix A, Letter from William H. Moore, P.E., to Sherri Abbas.)

Alternative 5: Offsite Alternative

CEQA generally does not require EIRs to consider “off-site alternatives” where a proposed project is consistent with the general plan and zoning designations for a property. (*Goleta II*, *supra*, 52 Cal.3d at p. 572-573; *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1751-1754 [12 Cal.Rptr.2d 308].) Even so, however, the EIR for the Granite Lake Estates project did include an off-site alternative, as described and discussed below.

The Project includes a residential development project on approximately 80 acres. There are few undeveloped areas in the City of Rocklin without active development entitlements that are of this size and close enough to existing or planned infrastructure (e.g., roads, sewer and water lines) to make connections possible without extensions through undeveloped land, which would create new impacts (especially regarding growth-inducement) rather than reduce impacts. Therefore, the only alternative location to be evaluated is land within the Northwest Rocklin Annexation Area, which is within the City’s sphere of influence. (Draft EIR, p. Q-49.)

The Offsite Alternative site includes the portion of the Northwest Rocklin Annexation Area just north of Stanford Ranch at the current terminus of Sioux Drive, an area that is roughly equivalent to 80 acres. Because the applicant for the Project does not own or in any way control the Offsite Alternative site, the Offsite Alternative is a variation of the No Project/No Development Alternative, in that the impacts associated with the Project site would not occur. (Draft EIR, p. Q-49.)

Land Use

Under the Project, impacts that address consistency with the City’s General Plan and compatibility with existing and planned uses were all determined to be less-than-significant impacts. Under Alternative 5, the impacts would similarly be less than significant. This alternative would require annexation into the City of Rocklin and would result in the conversion of approximately 80 acres of land currently designated Residential-Agriculture by Placer County to more urbanized uses. (Draft EIR, p. Q-49.)

Under Alternative 5, the City of Rocklin General Plan would need to be amended to include the project in the City. This alternative would be required to conform to the City's General Plan policies, as well as City Improvements Standards and Design Standards. The site is located immediately adjacent to residential development (Stanford Ranch) in the City of Rocklin. Like the Project, Alternative 5 would include 119 residential units and open space uses. Therefore, under this alternative, the impacts would be the same as those identified for the Project. However, because the site is not within the city limits and would involve amending the General Plan, the land use impacts are considered more severe than those of the Project. (Draft EIR, pp. Q-49, Q-50.)

Visual Resources

Under this alternative, the impacts would be the same as those identified for the Project. This alternative would propose development that would be constructed on undeveloped land adjacent to the Stanford Ranch development, which is in the City of Rocklin. This site contains predominately open rangeland consisting of annual grassland. The topography of this site ranges from approximately 180 to 250 feet. This site is visible from various elevated points within the City of Rocklin. The area to the immediate west, north and east of this site, is undeveloped grassland with occasional oak woodlands. Therefore, development under this alternative would change the visual character of the site from open grassland to a developed, residential area. (Draft EIR, p. Q-51.)

Similar to the Project, Alternative 5 would result in a residential character that would be comparable to the existing character of residential properties located to the south of the Project and to planned residential units on the Northwest Rocklin Annexation area. The height of residential structures would be limited to 30 feet and would provide for common elements within the new development, similar to existing adjacent development. While the area to the west, north, and east of the site is currently undeveloped, this area is part of the Northwest Annexation area, formerly identified in the General Plan as the Sunset Ranchos area and is currently designated as Planning Reserve. Under Alternative 5, the impact would be identical to that of the Project. (Draft EIR, p. Q-51.)

Under Alternative 5, the introduction of nighttime lighting could increase light and glare in the area, similar to what would occur with the Project. Development under Alternative 5 would have the potential to create artificial light from residential uses and roadways. It would also have the potential to reflect some sunlight during the day; however, residential structures are not likely to create substantial amounts of glare because of the materials used and the height of the structures. Night lighting would be readily apparent to neighboring properties that are not accustomed to development on the site, but the level of lighting would be typical of residential use and consistent with existing nearby lighting and is not expected to significantly impact neighboring properties. This level of light would represent a change from the existing condition, but would not introduce lighting different from that which already exists at other residences in the vicinity. Compliance with the City's lighting standards would reduce this impact. The impact would be similar to that of the Project, but slightly more severe because there are no existing trees to help

block or shield night lighting from adjacent areas. (Draft EIR, p. Q-51.)

The Project will contribute to a cumulative change in visual character and contribute to a cumulative increase in light and glare. Under Alternative 5, the impacts would be the same as those identified for the Project. Continued growth and development in the Cities of Rocklin, Roseville, and Lincoln will result in a long-term change to the aesthetic character of the region, gradually altering the region from predominantly open land to residential uses. As growth continues, the prevalent visual character will become predominantly residential with fewer open space and agricultural traits. Adherence to the development and design policies of the City of Rocklin General Plan would ensure that the visual character of areas developed in the future would be compatible with areas already developed in the City of Rocklin, but would not eliminate the shift from a rural to an urban character. Implementation of the Granite Lakes residential development on this location, in addition to future planned development in the Sunset Ranchos area, would substantially alter viewsheds and vistas and would result in a significant impact on visual resources that could not be mitigated to a less-than-significant level. Alternative 5 would contribute to the alteration of views and contribute to a significant and unavoidable cumulative impact, but because the area is more open than the Granite Lakes site, the impact would be considered slightly more severe. Lastly, the City of Rocklin General Plan Update EIR found visual impacts associated with buildout of the General Plan significant and unavoidable impacts. (Draft EIR, pp. Q-51, Q-52.)

Similar to what would occur with the Project, development of Alternative 5 would result in a cumulative increase in light and glare. Many areas that are presently undeveloped will support some level of outdoor lighting. The cumulative effect of this phenomenon would be an overall increase in nighttime light levels in the region, reducing views of the nighttime sky. Alternative 5 would contribute to the cumulative increase in light and glare, resulting in a slightly more severe impact because the area is completely open and there are no trees to shield light impacts. (Draft EIR, p. Q-52.)

Population, Employment and Housing

The Project will result in an increase in population, changes in the City's jobs/housing balance, and consistency with the City's General Plan policies. Under Alternative 5, the impacts would be the same as those identified for the Project. The location of the proposed Granite Lakes Estates development would change under Alternative 5, but the number of residential units and the number of residents would not change. Alternative 5 would add 119 single-family dwelling units and increase the population in the City by approximately 309. This increase is assumed in the projected future residential buildout for the City of Rocklin, and the impact would remain less than significant. Alternative 5 would also be consistent with the current General Plan population projections, and would not adversely affect the ability of the City to implement Housing Element policies. (Draft EIR, p. Q-52.)

Geology, Soils and Seismicity

The Project will result in exposure of people and property to seismic groundshaking on a project-specific level and a cumulative level. Under Alternative 5, this impact would be the same as for the Project. (Draft EIR, pp. Q-52, Q-53.)

Development of the Project can occur in areas underlain with shallow or exposed bedrock. The Offsite Alternative location consists of deposits that are traditionally mapped as Mehrten Formation in the Sierra Nevada foothill region. The soils on the site are predominately Exchequer-rock outcrop complex and inks-Exchequer complex. Although a site-specific geotechnical study has not been prepared for Alternative 5, the underlying formation is the same. Therefore, this impact would be the same as for the Project, with a similar mitigation measure. (Draft EIR, p. Q-53.)

The potential for the Project to alter site topography and affect the rate or extent of erosion was found to be less than significant. The exact topography of Alternative 5 is not known and a site-specific geotechnical report has not been completed for this location. Elevations in this area range approximately from 180 feet to 250 feet. This site does not contain slopes that would require stabilization to avoid erosion. The impact under this alternative would be less than significant and potentially less severe compared to the Project. (Draft EIR, p. Q-53.)

Hydrology, Water Quality and Flooding

The Project will increase the rate and amount of stormwater runoff from newly created impervious surfaces, which can contribute to localized or downstream flooding. The Project will result in impacts addressing the exposure of people to flooding hazards, increase in stormwater runoff, and construction activities that can degrade water quality in Secret Ravine Creek. None of the developed areas of the project site are located within the 100-year floodplain. Use of the larger quarry as a detention basin will detain stormwater flows from the northern portion of the site to minimize any increase in downstream flooding; and construction activities will be required to comply with BATs/BMPs that will reduce any impacts associated with increased erosion. Alternative 5 is not located within a 100-year floodplain; therefore, this impact would be similar to that of the Project. (Draft EIR, p. Q-53.)

Implementation of Alternative 5 would result in an increase in impervious surfaces similar to what would occur with the Project. However, this location does not contain existing quarry ponds that could be used as a detention basin; and it is not known whether the site's natural site topography could be used to effectively collect and deliver stormwater. Therefore, this impact is considered more severe than that of the Project. (Draft EIR, p. Q-53.)

Because Alternative 5 would not result in construction activity near Secret Ravine Creek, Sucker Creek and nearby pond areas, there would be no impact to these features. No waterways are located within Alternative 5. Therefore, it is assumed that any impacts to waterways outside the project site would be less than significant. The impact is considered slightly less severe than that of the Project. (Draft EIR, pp. Q-53, Q-54.)

Under the Project, stormwater runoff can contain urban contaminants. Alternative 5 would result in the same amount of construction as the Project, and would also result in activities that could increase the types or quantities of pollutants in runoff due to development. This impact is considered very similar to that of the Project. (Draft EIR, p. Q-54.)

The Project will result in a cumulative impact of construction activities that can affect water quality in Secret Ravine Creek. Under Alternative 5, no construction would occur on Secret Ravine Creek or in the Dry Creek Watershed. In addition, because there are no waterways either on or near the project site, there would be no impact associated with construction activities that could potentially affect waterways. Therefore, under this alternative, the impacts would be less-than-significant. (Draft EIR, p. Q-54.)

Biological Resources

The Project will result in the loss of native oak trees. Under Alternative 5, the habitat of the site is mainly grassland with no native oaks. Therefore, there would be no impact to native oak trees. (Draft EIR, p. Q-54.)

Development of the Project will result in disturbance and/or loss of natural habitat on the project site, including loss of annual grassland, oak woodland and riparian habitats. A total of approximately 54.15 acres of habitat will be lost due to project development. Under Alternative 5, development of this site would include the loss of annual grasslands. The loss of this habitat is not considered significant, so the impact would be less severe than that of the Project. (Draft EIR, p. Q-54.)

The Project will fill 0.488 acre of seasonal wetlands and other jurisdictional waters of the United States. Under Alternative 5, there would be no impacts to wetlands because there are no wetland areas on the site. (Draft EIR, p. Q-54.)

Development of the Project can disturb nesting raptors. Under Alternative 5, there is no nesting habitat for raptors. Therefore, under this alternative, there would be no impact to raptors. (Draft EIR, p. Q-54.)

Development of the Project will remove elderberry shrubs, some of which may host the valley elderberry longhorn beetle (VELB). Under Alternative 5 there are no elderberry shrubs located within the project site. Therefore, there would be no impact to elderberry shrubs. (Draft EIR, pp. Q-54, Q-55.)

The Project will result in impacts related to fisheries issues. Under Alternative 5, no bridge would need to be constructed and there are no issues related to fisheries because no streams are present in this area. Therefore, there would be no impact to fisheries. (Draft EIR, p. Q-55.)

Construction of the Project, in combination with other development in the County, can contribute to the cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland resources in the region. Under Alternative 5, the proposed residential development would remain the same. However, there would be no impact to raptors, elderberry shrubs, or fisheries; therefore, mitigation measures identified for the project would not be required. The cumulative impact, under Alternative 5, associated with the loss of these species would be considered less severe. (Draft EIR, p. Q-55.)

Construction of the Project, in combination with other development in this region, can contribute to the cumulative loss or deterioration of salmon and steelhead habitat and to the loss of aquatic resources in the region. Under Alternative 5, there are no issues related to fisheries or aquatic resources; therefore, there would be no impact. (Draft EIR, p. Q-55.)

Transportation/Circulation

Under the Project, traffic associated with the Project will increase congestion on City of Rocklin roadways and intersections. There will be no significant impacts to bicycles or transit facilities. Under cumulative conditions, impacts to local streets, collector streets, or arterials will be less than significant. (Draft EIR, p. Q-55.)

Alternative 5 would include the same number of dwelling units as the Project; therefore, the same number of vehicle trips would result as the Project. These trips would be generated in a different part of the Rocklin area. The addition of these vehicle trips would result in impacts on different roadways and intersections than what was analyzed under the Project. Under existing conditions, the intersection of Sunset Boulevard and Highway 65 currently operates at Level of Service D. The addition of Alternative 5 would most likely increase traffic volumes at this intersection during the PM peak hour and may degrade the LOS. This could be a significant impact. Under cumulative conditions, the intersections of Sunset Boulevard and Atherton and Sunset Boulevard and West Stanford Ranch Road are projected to operate at LOS F and E, respectively. The addition of Alternative 5 would add traffic volumes to these intersections that would only exacerbate the Level of Service deficiencies at these intersections. These intersections are all in close proximity to Alternative 5 location, and would be projected to receive additional traffic from the project. A more detailed level of analysis of Alternative 5 could result in other intersection and roadway impacts farther away from the project site. It is anticipated that Alternative 5 could also result in impacts on bicycle and transit facilities, as well. Therefore, traffic impacts under this alternative would be more severe compared to the Project. (Draft EIR, pp. Q-55, Q-56.)

Air Quality

Emissions associated with project construction will generate criteria air pollutants that will exceed Placer County APCD standards. Identical to the Project, implementation of Alternative 5 would generate emissions associated with construction of 119 single-family residential units. It is anticipated that construction emissions would still exceed the significance criteria for NO_x and PM_{10} . This impact would be similar to that of the Project. (Draft EIR, p. Q-56.)

The Project will result in emissions associated with project operation. Under Alternative 5, vehicle and area-wide source emissions would be similar to those estimated for the Project. As with the Project without mitigation, area-wide emissions associated with Alternative 5 emissions would exceed PCAPCD thresholds for ROG. This impact would be similar to that of the Project. (Draft EIR, p. Q-56.)

The Project will result in the potential for pockets of woodsmoke to occur due to the hilly topography of the project site. Under Alternative 5, the topography is flat, so there would be no impact associated with localized pockets of wood smoke. (Draft EIR, p. Q-56.)

Although project-related traffic will contribute to local CO emissions under the Project, these emissions will not exceed state or federal standards. Currently, intersections in the area of Alternative 5 (Sunset Boulevard/West Oaks Boulevard, Sunset Boulevard/West Stanford Ranch Road, West Stanford Ranch Road/West Oaks Boulevard, and West Stanford Ranch Road/Sioux Drive) are currently operating at LOS A. A cumulative air quality analysis completed for the proposed Northwest Rocklin Annexation project found that future development in the project area will result in a less-than-significant increase in CO concentrations. Therefore, CO impacts associated with the alternative would be less than significant, or the same as with the Project. (Draft EIR, p. Q-56.)

The Project, in combination with other development in the air basin, can interfere with achievement of the air district attainment goals for Ozone and PM_{10} . Similar to the Project, Alternative 5 would result in the construction of 119 single-family dwelling units creating operational vehicle and area wide emissions sources. Implementation of Alternative 5 would cumulatively contribute to an existing and future Ozone and PM_{10} non-attainment problem, the same as the Project. (Draft EIR, pp. Q-56, Q-57.)

Noise

Under the Project, construction activities will temporarily increase noise levels at existing noise-sensitive land uses. Alternative 5 would include the construction of 119 single-family residential units and would result in construction noise similar to that of the Project. The location of Alternative 5 is bounded on the west, north and east by undeveloped open space, and to the south by existing residential units in the Stanford Ranch development. Construction noise impacts would be similar to those of the Project

because the site is adjacent to both undeveloped and developed residential land uses. Project noise would affect existing residences on the northern boundary of Stanford Ranch during construction and along Sioux Drive from truck traffic associated with transport of heavy materials and equipment. This impact is considered to be the same as that of the Project. (Draft EIR, p. Q-57.)

The Project will result in noise from project operation and potential impacts to uses both on and off the project site, increase in traffic noise associated with project operation, and the increase in future noise levels associated with project traffic. Alternative 5 would produce operational noise impacts associated with residential activity and from project traffic. Alternative 5 would contribute new traffic primarily to Sioux Drive. Homes along Sioux Drive and on the northern boundary of the Stanford Ranch development would be the off-site residences most likely to experience a substantial increase in noise from project traffic accessing the site. It is unknown at this time what the increase in noise levels would be due to development of Alternative 5; however, the resulting noise levels could be greater than 60 L_{dn} at the adjacent properties. Therefore, under Alternative 5, this impact would be equal to or more severe than the Project. (Draft EIR, p. Q-57.)

Future development in the Northwest Rocklin Annexation area, including Alternative 5, can result in residential development in close proximity to existing and proposed roadways. Existing noise level measurements were recently taken in the vicinity of Alternative 5 for the proposed Northwest Rocklin Annexation project. Continuous hourly noise level measurements were conducted on the Offsite Alternative site. It is not anticipated that residents within Alternative 5 would be exposed to unacceptable levels of noise, and the impact would remain the same as that of the Project. (Draft EIR, p. Q-57.)

As with the Project, project traffic under Alternative 5 would contribute to cumulative growth and an increase in noise on roadways within the area and in residential areas along Sioux Drive. The cumulative traffic noise increases would occur as a result of other projects proposed for development in the area, combined with region wide growth, that would occur with or without Alternative 5. At this time, it is not known if the cumulative contribution of noise associated with the project would be significant, but because there is the possibility the impact is identified as being potentially significant. These impacts would be considered equal to or more severe than those of the Project. (Draft EIR, pp. Q-57, Q-58.)

Public Services

Law Enforcement

The Project will result in an increased demand on police services. There will be additional demands on police protection services created by cumulative development in the City of Rocklin. As with the Project, implementation of Alternative 5 would result in construction of 119 single-family dwelling units and the addition of approximately 309 persons. The location of Alternative 5 is currently outside of the City of Rocklin City

limits, but within the City's sphere of influence. The location is part of an area that was designated in the City of Rocklin General Plan as Planning Reserve and is planned for annexation into the City of Rocklin. If the site is annexed to the City, the site would be served by the City's police department. If the site is not annexed, it would continue to be served by the Placer County Sheriff's Department from the South Placer County Sheriff's Substation. The Sheriff's office and detention facility are located in Auburn, and the Department is currently staffed with 267 sworn and 113 non-sworn personnel. The Placer County Sheriff's Department does not maintain a designated level of service standard of personnel-to-residents because of the variation in population and terrain within the County. However, due to the relatively small increase in the need for law enforcement personnel, facilities and equipment generated by the Project, it is anticipated that this alternative would result in an impact to law enforcement similar to that of the Project. (Draft EIR, p. Q-58.)

Alternative 5 is in conformance with the level of development anticipated in the City of Rocklin General Plan for this site and the anticipated demand for additional law enforcement services. Under Alternative 5, the impact would be the same as the Project. (Draft EIR, p. Q-58.)

Fire Protection and Emergency Services

Implementation of the Project will increase the demand for fire protection, emergency services, and impacts associated with response time and emergency access. There will be additional demands on fire protection and emergency services created by cumulative development in the City of Rocklin. The Project will also result in an impact associated with development in steep terrain. Alternative 5 would include the construction of 119 single-family residential units and approximately 309 residents. Similar to the Project, Alternative 5 would slightly increase the need for additional fire personnel and equipment because the City's population would be increased. The alternative site would be served by Fire Station No. 2, located at 3401 Crest Drive. A parcel was reserved for a future fire station as a part of the Stanford Ranch General Development Plan, located on the south side of West Oaks Boulevard, adjacent to the City park. When constructed, this facility would provide fire protection, suppression and emergency services to the site. This impact would be the same as that of the Project. (Draft EIR, pp. Q-58, Q-59.)

The Rocklin Fire Department's review of development projects places emphasis on availability of water supply for fire flows and the distance in road miles from the closest fire station to the Project. The recommended distance for single and duplex dwellings is two road miles from the fire station to all points in the project site. The closest fire station to this site is Fire Station No. 2, approximately 2.5 miles from the offsite alternative. Until Station No. 3 is constructed, this distance would place the Alternative 5 project site outside of the recommended distance. Therefore, under Alternative 5, this impact regarding distance from the nearest fire station would be considered a potentially significant impact, resulting in a more severe impact compared to that of the Project. A mitigation measure requiring the installation of fire sprinklers would be needed until

Station No. 3 is constructed in order to reduce the impact to a less than significant level. (Draft EIR, p. Q-59.)

At this time, it is assumed that the circulation plan for Alternative 5 would be the same as the Project. It is assumed that the future roadway system through the project site would provide adequate access to the development and would not create an obstacle for fire protection and emergency services. The impact would be the same as that of the Project. (Draft EIR, p. Q-59.)

Buildout under Alternative 5 would result in the same population increase as the Project and the cumulative impact on fire protection and emergency services would remain less than significant. (Draft EIR, p. Q-59.)

Schools

The Project will increase the number of school-age children. Under the Project a total of 48 elementary students, 12 middle school students and 18 high school students will be generated. However, there is adequate capacity in either existing or planned schools to accommodate the Project. Alternative 5 would result in the same generation of residents and school-age children as the Project. The closest elementary school that would serve Alternative 5 would be Breen Elementary, and the closest middle school would be Granite Oaks Middle School. High school age students would attend Rocklin High School. All of these schools are currently operating within the maximum total capacity of the schools. Because Alternative 5 would generate the same number of school-age children as the Project, the impacts would be the same as those of the Project. (Draft EIR, pp. Q-59, Q-60.)

Parks

The Project will increase the demand for park facilities. The Project does not include any active parks, only passive open space. Because the City has determined that the project site is not suited for an active park, the project applicant is contributing a fee to the City for the purchase and construction of active park facilities in other areas of the City. It is not known at this time if the site for Alternative 5 would be similarly constrained from constructing a park on-site. However, if the City determines that this alternative site is also unsuitable for an active park, it is assumed that the project applicant would still contribute an additional fee to the City's fund. Because development under the Offsite Alternative would be the same as the Project, project-specific and cumulative impacts to parks would be the same. (Draft EIR, p. Q-60.)

Public Utilities

Water

Under the Project, the demand for water supply and treatment will increase. However, adequate water supplies are available to serve the project site. As with the Project, Alternative 5 would result in the development of 119 single-family residential units and the addition of 309 persons to the City of Rocklin. This would result in a similar demand for water supply and treatment. The impacts would be the same as those of the Project. (Draft EIR, p. Q-60.)

Construction of the new water distribution system will be done in compliance with PCWA's standards, which will ensure that the project's infrastructure was adequately sized and connected to PCWA's system. Implementation of Alternative 5 would also require construction of a water distribution system and would be required to comply with PCWA's standards. An existing water line is located to the south in the Stanford Ranch development. This impact would be the same as that of the Project. (Draft EIR, p. Q-60.)

The increased water demand generated by the Project will increase Citywide demand for water. This increase, in conjunction with cumulative development in the City of Rocklin and PCWA's service area, was found to be a less-than-significant impact. Because Alternative 5 would result in the same amount of residential development, the cumulative impact would remain less than significant. (Draft EIR, p. Q-60.)

Wastewater

The Project will increase the City's population and will result in increased wastewater flows. Under the Project, a total of 0.047 mgd of wastewater will be generated. A new wastewater treatment plant is under construction that could serve the project site. In addition, the existing wastewater treatment plant is in the process of being expanded to provide incremental capacity for growth anticipated to occur in the area. (Draft EIR, p. Q-61.)

A sewer trunk line currently crosses a portion of the project site. However, there is no wastewater infrastructure currently serving the project site, so new connections to the WWTP will be constructed to serve the Project. Alternative 5 would not require a sewer crossing over the Monument Spring Bridge. In the area of the Offsite Alternative, there is an existing sewer line on Sioux Drive in the Stanford Ranch area. The project would connect to this line. This impact is considered less severe compared to that of the Project. (Draft EIR, p. Q-61.)

Because Alternative 5 would result in the same amount of development as the Project, the same amount of wastewater would be generated; therefore, this impact would be the same as that of the Project. (Draft EIR, p. Q-61.)

Solid Waste

The Project will generate a total of approximately 389 tons per year of solid waste. Adequate capacity is available at the landfill to accommodate this increase. The cumulative contribution also determined that the impact will be less than significant. Because Alternative 5 would result in the same amount of residential development, the amount of solid waste generated would remain the same as for the Project. Therefore, these impacts would be identical to those of the Project. (Draft EIR, p. Q-61.)

In addition to solid waste generated after the Project is completed, there will be an increase in solid waste during project construction. There is adequate capacity at the landfill to accommodate this additional waste. Alternative 5 would result in the same amount of residential construction debris, and the impact would be identical to that of the Project. (Draft EIR, p. Q-61.)

Natural Gas and Electrical Services

The Project resulted in project-specific and cumulative impacts to natural gas and electrical services. These impacts will be less than significant because new development will be responsible for the costs associated with the necessary expansion and upgrading of the systems. Because Alternative 5 would result in the same amount of residential construction and population increase, the demand on natural gas and electrical services would be the same as under the Project. Impacts would be identical to those of the Project. (Draft EIR, pp. Q-61, Q-62.)

Cultural Resources

The Project can damage or destroy unidentified historic and/or prehistoric resources. However, mitigation will reduce this impact. The site for Alternative 5 has been surveyed for cultural resources and some resources were identified. As with the Project, excavation and grading activities during project construction could damage or disturb any undiscovered subsurface historic or archaeological resources. The impact would be the same as that of the Project. (Draft EIR, p. Q-62.)

Development of the Project will disturb identified resources on the project site. However, mitigation will offset this impact. It appears the site for Alternative 5 includes a previously-identified resource identified as walls, alignments, and fence lines on the historic Whitney Ranch. This site was determined not to be a significant resource because it lacks important data, cannot be dated, and its historical context cannot be explicitly defined. Because this site was determined not to be a significant resource, this impact would be less than significant. In addition, development on the Offsite Alternative site

would ensure the preservation of the identified prehistoric site located on the Granite Lakes site. Therefore, impacts to cultural resources associated with Alternative 5 are considered less severe. (Draft EIR, p. Q-62.)

Development of infrastructure off the project site can damage or destroy any unidentified resources. However, mitigation will reduce this impact. With Alternative 5, the potential for off-site infrastructure to damage or destroy unidentified resources during construction would be similar. Mitigation would be required to reduce the impact, the same as with the Project. (Draft EIR, p. Q-62.)

The Project is consistent with the City of Rocklin's General Plan policies. Alternative 5 would be developed in a manner similar to the Project, and this impact would remain less than significant. (Draft EIR, p. Q-62.)

Development of the project, in combination with other development in the Secret Ravine watershed, will contribute to the loss of cultural resources in the county. Implementation of Alternative 5, along with other cumulative development in South Placer County, could damage or destroy cultural resources particular to the area. This impact would remain significant and unavoidable under Alternative 5; however, it would be less severe. (Draft EIR, p. Q-62.)

Public Safety and Hazards

Construction and occupancy of the Project was determined not to result in a significant impact due to compliance with state law. Alternative 5 would result in the same amount and type of uses as the Project. The potential for the use, generation, storage, and disposal of hazardous materials from construction and operation of the site would be similar to what would occur with the Project, and the impact would be identical to that of the Project. (Draft EIR, p. Q-63.)

Development of the site can expose future occupants and construction workers to localized soil or groundwater contamination. However, mitigation measures will reduce hazardous materials risks. Alternative 5 would result in a similar amount of construction in the northwest portion of the City of Rocklin, on the site designated in the City of Rocklin General Plan as the Sunset Ranchos. A Phase I Environmental Site Assessment was performed for the Sunset Ranchos property and identified areas that have historically been used for disposal of trash and debris, potentially containing hazardous compounds. Construction activities on this site could encounter perched groundwater. Based on the site investigations, this water may have elevated levels of nitrates, as well as pesticides and herbicides. This impact is considered more severe than what would occur with the Project. (Draft EIR, p. Q-63.)

Development of the project site can expose project occupants and the public to physical hazards associated with the two granite quarries located on the project site. However, mitigation requirements reduce risks associated with the quarries. Implementation of

Alternative 5 would not include residential construction around existing quarries, so there would be no impact related to development around granite quarries. (Draft EIR, p. Q-63.)

The Project will result in exposure of project residents to rattlesnakes. The site for Alternative 5 consists mostly of open grassland and does not contain the type of rock outcrops found on the Project site. Rattlesnakes are present in the foothill areas so there is the possibility that rattlesnakes could be on the site. The impact would therefore be the same as that of the Project. (Draft EIR, p. Q-63.)

Project development can increase the potential for wildland fires. However, mitigation will ensure fire safety measures are followed to reduce the impact. The site for Alternative 5 is covered with grasslands and has a wildland fire potential similar to that of the Project site. (Draft EIR, p. Q-63.)

The Project, in combination with other development, will increase the number of people exposed to safety hazards and hazardous materials. Implementation of Alternative 5 would result in the same amount and type of development as the Project, and the impact would remain less than significant. (Draft EIR, p. Q-64.)

Relationship of the Offsite Alternative to the Project Objectives; Infeasibility of Alternative

The Offsite Alternative would meet most of the project objectives – at least as understood without regard for the Project site. The Offsite Alternative would locate the project in the northwest corner of the City of Rocklin near State Route 65 and the Sunset Industrial Area, which includes the fully-developed Atherton Tech Center. This relocation would increase the City's housing supply in close proximity to existing transportation corridors and employment centers to minimize trip length for employees. The alternative project site was designated by the City of Rocklin as Planning Reserve, and the General Plan would need to be amended to include the project in the City. Residential uses on this site would be consistent with the City's land use plans and compatible with existing development in the Stanford Ranch area. However, the site is not designated or zoned for housing, per se, the project would not fully meet the intent of the objectives. The Offsite Alternative would meet the objective of providing residential uses in an area contiguous to existing development because it would border existing Stanford Ranch development to the south. This alternative would also include financing for future infrastructure.

As an offsite alternative to development on the Granite Lakes Estates site near Secret Ravine, the Offsite Alternative would not provide protection of Secret Ravine and other onsite natural resources because development in this area would not affect these resources. The Offsite Alternative would not be consistent with project objectives because implementation of this alternative would not include roadway improvements in the Southeast Rocklin area. Although the final design of this alternative is not known at this time, the Offsite Alternative site does not include existing detention facilities, such as the granite quarries, that would provide an onsite drainage feature and could be

inconsistent with the project objectives. (Draft EIR, p. Q-64.) The Project, in contrast, funds a new bridge of Secret Ravine Creek, as contemplated by the General Plan, will create a new public trail that will open up recreational opportunities along the Creek, and will allow for public access to visually attractive property that would otherwise remain in private ownership.

More fundamentally, however, development of the offsite alternative does not deal with the reasonable investment-backed expectations of the owner of the Granite Lake Estates property, which is planned and zoned for residential development. A decision by the City to "pursue" the off-site alternative would amount to a denial of the pending application for the Project, as the City has no reason to believe that the applicant can obtain control over the Sunset Ranchos property. (See CEQA Guidelines, § 15126.6., subd. (f)(1) "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" is a factor in determining whether an alternative is "feasible".) As noted earlier, then, the off-site alternative is really a variation of the No Project Alternative, and is infeasible for the same reasons that the No Project Alternative is infeasible. If the Council denied the proposed Project, it would simply delay the date on which it would eventually have to approve development consistent with the subject property's general plan and zoning designations.

As noted previously more than once, Government Code section 65589.5, subdivision (j), does not permit the City, under the present circumstances, to deny the Project as proposed, as it is a "housing development project" that complies with applicable "general plan and zoning standards and criteria[.]" Such a denial could only be legally permissible if the Council were able to make written findings identifying substantial evidence showing that denial is necessary to avoid a "specific, adverse impact upon the public health and safety[.]" Here, because the Project complies with all relevant general plan and zoning standards and criteria, and does not cause any adverse effects on public health and safety, the City is required by law to approve the Project as proposed. (See *Sequoyah Hills*, *supra*, 23 Cal.App.4th at p. 715.)

Even in the absence of these legal constraints, however, the Council would see no reason to turn down the project as proposed solely in order to require the applicant to come in with a new application in the future. The current project is consistent with the General Plan, is subject to numerous mitigation measures that have avoided most of its potential significant impacts, and reflects the landowner's considered judgment regarding how to develop its property in light of the realities of the marketplace. The Council believes it is appropriate to give some weight to this entrepreneurial judgment. (See *Laurel Hills*, *supra*, 83 Cal.App.3d at 521 (a "public agency may approve a developer's choice of a project once its significant adverse effects have been reduced to an acceptable level – that is, all avoidable damage has been eliminated and that which remains is otherwise acceptable").)

Alternative 6: Open Space Ownership/Access Alternative

Under Alternative 6, the same development density and infrastructure as the Project is assumed. However, this alternative considers the benefits/disadvantages and impacts of different ownership and access options for the open space areas. (Draft EIR, p. Q-64.)

The Open Space areas on the project site can be categorized into three different subareas: 1) Parcel J, which is 12.15 +/- acres in size, is located along the northwestern boundary of the project site. This parcel includes the 100-year floodplain of Secret Ravine Creek and is the location of the future bicycle/pedestrian trail; 2) Parcels A, B, C, D, E, F, G, H, and K, which vary in size from 7.58 +/- acres to 0.03 +/- acres, are located throughout the project site area. These parcels represent the open space areas that are mostly associated with the water features of the project site; and 3) A private Open Space Conservation Easement, approximately 6.51 +/- acres in size that exists on a portion of the backyard areas for Lots 41-57.

The Homeowner's Association would be responsible for maintaining the open space areas that are included in Parcels A, B, C, D, E, F, G, H, and K. Several options exist for the responsibility for maintaining the open space area that is included in Parcel J and those options are discussed below.

Options analyzed for ownership of the open space areas include: 1) a Homeowners Association where access either would be limited to residents of the Project or would be open to general public through an agreement with the city. It is assumed that any trails provided in the open space areas would not be constructed to city standards. The trails would be more informal, similar to a dirt path; 2) conveyance to a public entity such as the Dry Creek Conservancy where access would be restricted, and trails would be provided, the same as Option 1; or 3) conveyance to the City of Rocklin resulting in access being granted to the general public and possible incorporation of a paved multi-use trail. (Draft EIR, p. Q-64.)

Option 1: Homeowners Association (access limited to residents of the Project)

Under this option, access to the 12.15 +/- acre Parcel J open space area within the project site would be limited to residents of the Project. Approximately 309 residents of the project would have access to this area. The Homeowners Association would be responsible for all maintenance and security of this area. It is assumed that no regular security would be provided to these areas, but City police officers would respond in an emergency. To prohibit any unauthorized access, signs would be installed limiting access to residents of the Project. In addition, it is assumed that the CC&R's for the homeowners association would restrict access to this area to daytime hours. There would be no lighting included. Activities allowed would be considered 'passive' and could include bird watching, walking, hiking, picnicking, and other similar activities. Under this option, it is assumed that any trails constructed in the open space areas would not be constructed to city standards or be served by the city for maintenance or security. It is anticipated that

if any trails are provided, they would be single-track, dirt paths. Activities such as fishing, hunting, mountain biking, dirt bike riding, or horseback riding would not be permitted.

Those issue areas that could be affected by this option are discussed below.

Geology, Soils and Seismicity

Under Option 1, it is anticipated that the types of uses allowed in the open space areas would not increase erosion along Secret Ravine Creek or in other areas of the open space. The types of uses that would be allowed in this area are limited to activities that are considered low-impact passive recreation. No development of any kind would occur in this area; therefore, the topography of the site would not be disturbed and there would be no increase in storm runoff associated with earth moving activities. In addition, due to the small number of people that would be permitted to use this area and the types of uses that would be allowed, it is anticipated that there would not be increased erosion throughout the open space area, especially along the banks of Secret Ravine Creek. Under this option, dirt trails could be constructed. It is assumed that construction of these trails would require removal of brush and would be done by hand; no grading or motorized equipment would be required. It is assumed that on-going maintenance would also be limited to clearing brush and would also be done by hand. It is also assumed that during the rainy season the trails would receive less use, minimizing the occurrence of increased erosion. The impact would be considered less than significant. (Draft EIR, p. Q-65.)

Hydrology, Water Quality and Flooding

Under Option 1, as discussed above under Geology, any erosion that would occur in the open space areas that could effect the sedimentation and water quality in Secret Ravine Creek would be considered negligible. No new impervious surface areas would be created that could increase the rate and amount of stormwater runoff. Therefore, under this option, the impact would be considered less than significant. (Draft EIR, pp. Q-65, Q-66.)

Noise

Under this option, it is anticipated that access to the open space area would be limited to daylight hours. Signs would be posted to remind residents that access is limited to certain hours. In addition, the activities allowed do not generate a significant amount of noise; therefore, it is anticipated that any noise impacts would be considered less than significant. (Draft EIR, p. Q-66.)

Biological Resources

Under Option 1, impacts to biological resources would be minimal and primarily associated with construction and use of the trails. It is assumed that trails would be constructed by hand and would not involve the use of any heavy equipment. It is also

assumed that primarily brush would be cleared and no trees would be removed during trail construction. Therefore, impacts to biological resources associated with trail construction would be less than significant. (Draft EIR, p. Q-66.)

Under Option 1, only the residents of the Project would be allowed access to this area. Due to the small number of people that would have access to this area and the types of activities that would be permitted, potential impacts to habitat, including riparian habitat along Secret Ravine and Sucker Ravine creeks, and wildlife would not be considered significant. (Draft EIR, p. Q-66.)

Recreation/Security

The City of Rocklin General Plan does not contain any goals or policies for the provision of recreation that would pertain to this option. Under Option 1, the recreational value of this area would be limited because only residents of the Project would be allowed access. (Draft EIR, p. Q-66.)

Under this option, it is assumed that security to the open space areas would be provided by the Homeowners Association. Due to the location of some of these open space areas drive-by surveillance would not be an option for city police officers because they would be obscured by houses. Backyards would be oriented towards the creek with houses fronting the street. This would make it difficult for police surveillance. Officers would respond only when contacted. However, under this option, because access to the open space areas would be limited to residents of the Project, it is assumed that there would be less pedestrian traffic and minimal need for security. (Draft EIR, p. Q-66.)

Public Services

Under this option, access to project residents would be provided to the open space areas on the project site. Due to the increase in people accessing this area, there could be an increased potential for wildland fires. Access to this area would be limited, but would be accessible for fire vehicles in the event of fire. (Draft EIR, p. Q-66.)

Option 1a: Homeowners Association (public access allowed)

Under Option 1a, the general public, as well as residents of the Project, would have access to the 12.1+/- acre Parcel J acre open space area within the project site. The same types of activities as Option 1 would be permitted. As with Option 1, it is anticipated that any trails provided in the open space areas would not be constructed to city standards and all maintenance and security of this area would be the responsibility of the Homeowners Association. It is anticipated that if any trails are constructed they would be the same as Option 1. Hours of access would be limited to daylight hours only and no lighting would be provided.

Those issue areas that could be affected by this option are discussed below.

Geology, Soils and Seismicity

The primary difference between Option 1a and Option 1 is that the general public would be permitted access to the open space areas. The types of uses allowed under this option would remain the same as Option 1. Because more people would have access to this area, there is slightly more of an increased risk of erosion occurring due to more people walking on the dirt trails throughout the area. However, due to the location and size of the open space areas, it is not anticipated that a large number of people would access the site. The same as Option 1, construction of trails would require removal of brush and would be done by hand; no grading or motorized equipment would be required. It is assumed that on-going maintenance would also be limited to clearing brush and would also be done by hand. It is also assumed that during the rainy season the trails would receive less use minimizing erosion from occurring. Under this option, the impact would be considered less than significant. (Draft EIR, p. Q-67.)

Hydrology, Water Quality and Flooding

Under Option 1a, because more people would have access to the area, the risk of erosion would slightly increase. Any erosion that occurs near the banks of Secret Ravine Creek could affect the sedimentation and water quality in the creek. However, this contribution is not anticipated to be a significant amount. Therefore, under this option, the impact would be considered less than significant. (Draft EIR, p. Q-67.)

Noise

Under this option, it is anticipated that access to the open space area would be limited to daylight hours. Signs would be posted stating that access is limited to daylight hours. In addition, the activities allowed do not generate a significant amount of noise; therefore, it is anticipated that any noise impacts would be considered less than significant. (Draft EIR, p. Q-67.)

Biological Resources

Under Option 1a, impacts to biological resources due to construction would be the same as discussed under Option 1. Impacts due to increased use of this area would be greater under this option because more people would be allowed access. The types of permitted activities would be the same as what was discussed under Option 1. The difference would be that more people could potentially access this area creating a disturbance to wildlife and habitat. Because the general public would be allowed access, there could be more disruption to habitat and wildlife resulting in a potentially significant impact. (Draft EIR, p. Q-68.)

Recreation/Security

The City of Rocklin General Plan does not contain any goals or policies for the provision of recreation that would pertain to this option. Under Option 1a, the recreational value of this area would be greater because it would be accessible to the general public. (Draft EIR, p. Q-68.)

The same as Option 1, it is assumed that security to the open space areas would be provided by the Homeowners Association. Due to the location of some of these open space areas behind the backyards of some of the homes, drive-by surveillance would not be an option for city police officers. Officers would respond only when contacted. However, under this option, because access to the open space areas would be open to the general public, it is assumed that there would be more pedestrian traffic than under Option 1. (Draft EIR, p. Q-68.)

Public Services

Similar to Option 1, this option would allow access to the open space areas on the project site. However, under this option, access would be permitted for the general public as well as project residents. Access to this area would be limited, but would be accessible for fire vehicles. (Draft EIR, p. Q-68.)

Council Reasons for Rejecting Options 1 and 1a

Nothing in CEQA creates any presumption that Options 1 or 1a should be chosen if "feasible," because these alternatives do not have the effect of further reducing any significant effects of the Project that have not been at least substantially lessened through mitigation. In other words, neither Option 1 nor Option 1a tends to reduce the Project's visual effects, its contribution to cumulative visual impacts, the short-term loss of oak trees, or the cumulative loss of cultural resources. The Council therefore has broad discretion to accept or reject Options 1 or 1a for any rational public policy reason.

The Council rejects both of these options, because it believes that public ownership of the 12.15+/- acre Parcel J open space within the project area, with a trail built to City standard, will provide the widest possible public benefit by making the area accessible to the greatest number of Rocklin residents. Although a Homeowners Association might choose to invite the general public onto the property, City residents would have a right to use the property if it is owned by the City. The City also believes itself more qualified, in the long term, to provide effective maintenance and policing of the Parcel J open space area. Furthermore, a trail built to City standards could be used by bicyclists and will be safer for persons of limited mobility than a trail to lesser standards would be. For these same reasons, the Council would reject Options 1 and 1a if such a determination were legally necessary.

Option 2: Public Entity (i.e., Dry Creek Conservancy)

Under this option, a public entity, similar to an organization like the Dry Creek Conservancy, would assume ownership of the open space areas, including the responsibility of maintenance and security. Access to the open space areas would be more restricted. Similar to Option 1, hours of access would be limited to daylight hours and no lighting would be provided. It is assumed that if an entity such as the Dry Creek Conservancy assumed ownership of these areas that guided nature walks and other such activities would be available to the public and residents. Under this option, as with Option 1, if trails are provided they would not be paved and would be the responsibility of the Conservancy to maintain and provide security. The same types of activities permitted under Option 1 would also be permitted under this option. (Draft EIR, p. Q-68.)

Those issue areas that could be affected by this option are discussed below.

Geology, Soils and Seismicity

The types of uses allowed under this option would be the same as Option 1 and Option 1a. Even though the allowed uses are the same, the total number of people allowed access to the area would be greater, similar to what would occur under Option 1a. However, the access opportunities would be more structured and supervised by representatives of the Conservancy. Because more people would have access to this area, there could be a slight increase in the risk of erosion occurring due to more people walking on the dirt trails throughout the area. However, due to the location and size of the open space areas, it is not anticipated that a large number of people would access the site. Trails would be constructed the same as discussed under Option 1 and Option 1a. Therefore, although there could be a slight increase in erosion throughout the open space area, including along the banks of Secret Ravine Creek under Option 2, it is not expected to be significant. Under this option, the impact would be considered less than significant. (Draft EIR, pp. Q-68, Q-69.)

Hydrology, Water Quality and Flooding

Under Option 2, as with Option 1a, more people would have access to the open space areas and the risk of erosion would slightly increase. Any erosion that occurs near the banks of Secret Ravine Creek could affect the sedimentation and water quality in the creek. However, this contribution is not anticipated to be a significant amount. Therefore, under this option, the impact would be considered less than significant. (Draft EIR, p. Q-69.)

Noise

Under this option, it is anticipated that access to the open space area would be limited to daylight hours, the same as with Option 1 and Option 1a. Signs would be posted stating that access is limited to daylight hours. In addition, the activities allowed do not generate a significant amount of noise; therefore, it is anticipated that any noise impacts would be considered less than significant. (Draft EIR, p. Q-69.)

Biological Resources

Impacts to biological resources under this option would be the same as those discussed under Option 1a. (Draft EIR, p. Q-69.)

Recreation/Security

The City of Rocklin General Plan does not contain any goals or policies for the provision of recreation that would pertain to this option. Under Option 2, as with Option 1a, the recreational value of this area would be greater because there would be controlled access available to the general public. (Draft EIR, p. Q-69.)

Unlike Option 1 and Option 1a, it is assumed that security to the open space areas would be provided by the Conservancy. Due to the location of some of these open space areas, drive-by surveillance would not be an option for city police officers. Officers would respond only when contacted. However, under this option, because access to the open space areas would be open to the general public, it is assumed that there would be more pedestrian traffic than under Option 1. (Draft EIR, p. Q-69.)

Public Services

The provision of public services would be the same as discussed under Option 1a. (Draft EIR, p. Q-69.)

Council Reasons for Rejecting Option 2

Nothing in CEQA creates any presumption that Option 2 should be chosen if "feasible," because this alternative does not have the effect of further reducing any significant effects of the Project that have not been at least substantially lessened through mitigation. In other words, Option 2 does not tend to reduce the Project's visual effects, its contribution to cumulative visual impacts, the short-term loss of oak trees, or the cumulative loss of cultural resources. The Council therefore has broad discretion to accept or reject Option 2 any rational public policy reason.

The Council rejects Option 2 because it believes that public ownership of the 12.15+/- acre Parcel J open space within the project area, with a trail built to City standard, will provide the widest possible public benefit by making the area accessible to the greatest

number of Rocklin residents. Although a private conservancy might choose to invite the general public onto the property, City residents would have a right to use the property if it is owned by the City. The City also believes itself more qualified, in the long term, to provide effective maintenance and policing of the open space areas. Furthermore, a trail built to City standards could be used by bicyclists and will be safer for persons of limited mobility than a trail to lesser standards would be. For these same reasons, the Council would reject Option 2 if such a determination were legally necessary.

Option 3: City of Rocklin

Under Option 3, the City of Rocklin would assume ownership over the 12.15+/- acre Parcel J open space area. Under this option, the project residents, as well as the general public, would have access to the open space areas. The same type of activities would be allowed under this option as Option 1, with the exception of bicycling which would be permitted under Option 3. Under this option, the developer would be required to construct a paved multi-use trail through the open space area adjacent to Secret Ravine Creek. This paved trail would require clearing of brush, limited grading, and the creation of some impervious surface area.

Those issue areas that could be affected by this option are discussed below.

Geology, Soils and Seismicity

The types of uses allowed under this option would be the same as Option 1, Option 1a, and Option 2, with the exception of bicycling that would be permitted. Even though the allowed uses are the same, the total number of people allowed access to the area would be similar to Option 1a. Under this option, the number of people accessing the area could increase even more due to the paved bike/walking trail amenity. The addition of a paved trail would create less of an erosion potential. However, during project construction, there could be a slight increase in the short-term erosion associated with construction. Furthermore, due to the location and size of the open space areas, it is not anticipated that a large number of people, beyond the project residents, would access the site. Therefore, there could be a slight decrease in erosion due to the provision of a paved trail. Any erosion, including along the banks of Secret Ravine Creek under Option 3, is not expected to be significant. Under this option, the impact would be considered less than significant. (Draft EIR, p. Q-70.)

Hydrology, Water Quality and Flooding

Under Option 3, the same as with Options 1a and 2, more people would have access to the area increasing the risk of erosion. However, under this option, a paved multi-use trail would be constructed within the open space area near the creek. The addition of this paved trail would reduce the potential for erosion to occur. Any erosion that occurs near the banks of Secret Ravine Creek could affect the sedimentation and water quality in the creek. However, this contribution is not anticipated to be a significant amount.

Therefore, under this option, the impact would be considered less than significant. (Draft EIR, p. Q-70.)

Noise

Under this option, it is anticipated that access to the open space area would be limited to daylight hours, the same as with Option 1, Option 1a, and Option 2. Signs would be posted stating that access is limited to daylight hours. In addition, the activities allowed do not generate a significant amount of noise. However, because a paved trail would be provided, there is the potential for more people to access the area resulting in a potential increase in noise associated with people talking and bicycling. It is anticipated that noise impacts associated with these activities would be considered less than significant. (Draft EIR, pp. Q-70, Q-71.)

Biological Resources

Under Option 3, impacts to biological resources would be very similar to those of Options 1a and 2, except that, under Option 3, a paved, multi-use trail would be provided. Construction of this trail would require the use of some heavy equipment to clear a pathway and to level the area to be paved. These activities would result in more disturbance to habitat and wildlife. It is assumed that the trail would be designed to minimize tree removal to the extent feasible. However, it is anticipated that there would be short-term construction-related impacts to wildlife in the area and the potential long-term loss of habitat. (Draft EIR, p. Q-71.)

At this time, it is not known how many people in reality would use this area and what the adverse effects would be. However, because the general public would be allowed access, there could be more disruption to habitat and wildlife resulting in a potentially significant impact, the same as Options 1a and 2. (Draft EIR, p. Q-71.)

Recreation/Security

The City of Rocklin General Plan does not contain any goals or policies for the provision of recreation that would pertain to this option. Under Option 3, the recreational value of this area would be greater because it would be accessible to the general public, the same as with Option 1a and Option 2. (Draft EIR, p. Q-71.)

Unlike Options 1, 1a, and 2, it is assumed that security to the open space areas would be provided by the City. Due to the proposed design of the project, most of the open space areas would not be observable to officers driving by. Officers would primarily respond when contacted regarding security issues. Because access to the open space areas would be open to the general public, it is assumed that there would be more pedestrian traffic than under Options 1a and 2. The potential need for police protection services would be slightly higher, but is still considered less than significant. (Draft EIR, p. Q-71.)

Public Services

Under Option 3, access would be provided by a paved multi-use trail through the open space area adjacent to the creek. Although the potential for wildland fires would be similar to Options 1, 1a, and 2, access to the area for fire vehicles would be greatly improved due to the presence of a paved trail. Providing adequate access through this area would enable city firefighters access in the event of a wildfire. This impact would be considered less than significant. (Draft EIR, p. Q-71.)

Council Reasons for Choosing Option 3

As noted earlier, the Council believes that public ownership of the 12.15+/- acre Parcel J open space within the project area, with a trail built to City standard, will provide the widest possible public benefit by making the area accessible to the greatest number of Rocklin residents. Although a Homeowners Association or private conservancy might choose to invite the general public onto the property, City residents would have a right to use the property if it is owned by the City. The City also believes itself more qualified, in the long term, to provide effective maintenance and policing of the open space areas. Furthermore, a trail built to City standards would allow for bicycling and will be safer for persons of limited mobility than a trail to lesser standards would be.

XI. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the City's approval of the Granite Lakes Estates Project will result in several impacts which remain significant and unavoidable. Despite these impacts, however, the City Council has chosen to approve the Project (as mitigated). To do so, the Council must first adopt this Statement of Overriding Considerations.

Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a Court were to conclude that not every reason is supported by substantial evidence, the City Council would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Section (XI), and in the documents found in the Record of Proceedings, as defined in Section V.

The City finds that the Granite Lakes Estates Project would have the following economic, social, or other benefits:

Provision of Needed Housing Units; Consistency with, and Implementation of, the City's General Plan. The Granite Lakes Estates Project is consistent with the General Plan with respect to its land use designation. The land uses contemplated by the Project are fully consistent with the growth policies embodied in the City of Rocklin General