Mitigation Measures:

No mitigation measures are available.

Significance After Mitigation

Significant and unavoidable. (Draft EIR, p. O-19.)

D. <u>LESS THAN SIGNIFICANT IMPACTS PRIOR TO MITIGATION</u>

Impact E-3: Light and glare from the Project will substantially alter the nighttime lighting character of the area. (Draft EIR, p. E-11.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

Development of the project site will introduce lighting from residential uses. Night lighting will be readily apparent to neighboring properties that are not accustomed to development on the site; but the type of lighting will be typical of residential use and is not expected to significantly impact neighboring properties. This level of light will represent a change from the existing condition, but will not introduce lighting unlike that which already exists at other residences in the vicinity. Streetlights within the project area will adhere to the City's light standards for roadway streetlights. (Draft EIR, p. E-11.)

Comments in response to the Notice of Preparation also stated that development will have the potential to reflect some sunlight during the day, especially in the direction of sunrise and sunset. Lots within the project site have required setbacks where existing vegetation will be retained and new vegetation planted that will reduce the potential for glare on adjacent residences. In addition, due to the position of the sun and the height of the homes, glare from the sun on windows will not be high enough to reflect sunlight that will affect existing residences or roadways. Given that the elevation of the residences to the west is higher than the Project site, these residences will not be affected by glare from the sun. Existing residences located farther east on Greenbrae Road front the road, but they are set back farther and generally have vegetation within this setback. Given the distance to the project site and the setbacks and vegetation that will be retained or planted, these residences will not be significantly affected by glare. (Draft EIR, p. E-11.)

Mitigation Measures:

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

REQ-MM

Roadway streetlights on the project site shall adhere to the City of Rocklin residential street light standards. (Draft EIR, p. E-11.)

Impact G-1: People and property can be subject to seismic groundshaking. (Draft EIR, p. G-8.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, § 15091, 15126.4, subd. (a)(3).)

Explanation:

There are no significant constraints to development related to groundshaking that cannot be mitigated through implementation of applicable regulations and codes and standard engineering practices. Implementation of UBC/CBC and local building code, and permitting requirements that are applicable to the project site, will minimize the potential for adverse effects on people and property to occur due to seismic activity. Although the Project will increase the number of people who can be exposed to seismic hazards, assuming compliance with all applicable regulations, standards, and codes, occupancy of the Project will not expose people or property to any new or substantially different risks associated with seismic hazards compared to existing conditions. (Draft EIR, p. G-9.)

Mitigation Measures:

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

REQ-MM Development of the Project shall be consistent with the California Building Code (CBC) and Uniform Building Code (UBC). (Draft EIR, p. G-8.)

Impact G-3: Site development can result in topographic alteration and soil disturbance, which can lead to increased erosion potential. (Draft EIR, p. G-11.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

Approximately 33 acres of the 80-acre project site will be incrementally graded in four phases through buildout of the Project to accommodate pad-graded and partially padgraded lots, in addition to project roadways. Grading, vegetation removal, as well as excavation and trenching for on-site and off-site utility lines, will disturb soils, which can increase the rate of erosion. A very limited amount of grading is anticipated on slopes exceeding 25 percent. The grading plan prepared for the project by Terrance E. Lowell & Associates, Inc., ("TLA") has taken into consideration the natural topography of the project site, and proposes to incrementally grade a total of approximately 33 acres of the 80-acre site. Of these 33 acres, approximately 14.4 acres are to be graded for roadways and another 18.6 acres are to be graded for building pads. An indeterminate amount of additional grading will occur on limited graded and limited pad graded lots. Grading activities for these lots are not part of the tentative map application, and will be subject to compliance with the approved Grading Design Guidelines during the Building Permit process. Of the 119 residential lots, 66 lots will have limited grading, using the natural topography to the extent possible. Implementation of the measures identified in the CBC and the Project's grading plan will ensure that erosion at the project site is minimized and is completed using BMPs, in addition to BATs and site-specific recommendations. (Draft EIR, p. G-12.)

Mitigation Measures:

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

REQ-MM

The Project shall comply with the erosion control and site preparation requirements of the CBC, UBC, and the City's Construction Specifications, Improvement Standards, Standard Drawings, and Best Available Technologies/Best Management Practices (BATs/BMPs). (Draft EIR, p. G-11.)

Impact G-4: 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. (Draft EIR, p. G-13.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

The Project will increase the number of people and structures that can be exposed to potential effects related to seismic hazards. Development of the Project will also increase the number of structures that can be subject to the effects of shallow depth-to-rock or expansive soils. Site preparation will also result in temporary and permanent topographic changes that can affect erosion rates or patterns. However, potentially adverse environmental effects associated with seismic hazards, as well as those associated with geologic or soils constraints, topographic alteration, and erosion, are usually site-specific and generally will not combine with similar effects that can occur with other projects in Rocklin. Consequently, the Project will generally not be affected by, nor will it affect, other development anticipated under the General Plan. (Draft EIR, p. G-13.)

Mitigation Measures:

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

REQ-MM The Project shall comply with the erosion control and site preparation requirements of the CBC, UBC, and the City's Construction Specifications, Improvement Standards, Standard Drawings, and Best Available Technologies/Best Management Practices (BATs/BMPs). (Draft EIR, p. G-13.)

Impact H-3: Grading, excavation, and construction activities associated with the Project can degrade water quality and increase deposition of sediment in Secret Ravine Creek, Sucker Ravine Creek, and pond areas on the project site. (Draft EIR, p. H-22.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

Construction of the Project will involve incremental grading of the project site, which will substantially increase the amount of soil able to be carried into nearby waterways via surface runoff. As described in TLA's grading plan for the Project, approximately 33 acres of the 80-acre site will be graded to prepare roadways and residential foundations. In addition, construction activities such as excavation and trenching for utilities will result in substantial disturbance of soils, which can increase sedimentation in stormwater runoff. Dust from project construction can also be transported to other nearby locations where it can enter surface water runoff and water bodies. In addition, contaminated soil impacted by spills and leaks from heavy equipment and machinery, staging areas, or building sites can also be a component of runoff that can degrade water quality. Typical pollutants contained in surface runoff include petroleum products and heavy metals from equipment, and products such as paints, solvents, and cleaning agents that can contain hazardous constituents. (Draft EIR, p. H-23.)

Sediment containing graded or excavated surface materials, or leaks or spills from construction equipment, can also result in water quality degradation, if runoff containing the sediment entered receiving waters in sufficient quantities. However, these impacts will generally be short-term, limited to the duration of construction, and will be heavily regulated by State and local construction regulations. (Draft EIR, p. H-23.)

Mitigation Measures:

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

REQ-MM

Comply with, at minimum, the provisions of the State General Construction Activity Permit, which requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and the implementation of Best Management Practices (BMPs) and Best Available Technologies (BATs) to control construction site runoff. Typical BMPs that can be used during construction of the Project include, but are not limited to, the following:

Temporary facilities such as waddles and sandbags may be used during construction. Temporary facilities are designed to help control dust and will capture a majority of the siltation resulting from construction

activities prior to discharging into existing natural channels. In addition, they will trap possible fuel and oil spills from construction equipment to prohibit contamination of surface flows or groundwater. The construction contractor will be required to monitor and maintain all BMPs during construction to ensure they function properly. (Draft EIR, pp. H-22, H-23.)

Impact H-5: Construction activities associated with the Project, in combination with other development that can occur within the Dry Creek Watershed, can affect the quality of receiving water. (Draft EIR, p.H-28.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

Potential construction-related water quality and sedimentation effects are generally site-specific, will be short-term, and will be mitigated through implementation of the State's General Construction Activity Stormwater Permit requirements (i.e., SWPPP) and local site development standards. These requirements, in addition to industry standard BMPs, will minimize sedimentation and reduce the potential for degradation of water quality during construction activities. The Project will incrementally contribute to the overall quality of downstream waters because natural runoff can enter existing channels that drain into Secret Ravine Creek and the Dry Creek watershed; however, this natural runoff will occur regardless of project development. The Project, in combination with the construction of other projects that will occur within the Dry Creek watershed, will not result in any significant cumulative construction-related water quality impacts because it is assumed that all other developments will also be required to comply with relevant laws, regulations, and standards governing construction-related water quality impacts. (Draft EIR, p. H-28.)

Mitigation Measures:

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

REQ-MM Comply with provisions of the State General Construction Activity Permit, which at minimum, requires the preparation of a SWPPP and implementation of site-specific BATs/BMPs. Typical BMPs that can be used during construction of the Project include, but are not limited to, the following:

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Temporary facilities such as waddles and sandbags may be used during construction. Temporary facilities are designed to help control dust and will capture a majority of the siltation resulting from construction activities prior to discharging into existing natural channels. In addition, they will trap possible fuel and oil spills from construction equipment to prohibit contamination of surface flows or groundwater. The construction contractor will be required to monitor and maintain all BMPs during construction to ensure they function properly. (Draft EIR, p. H-28.)

Impact I-2: Construction of Monument Springs Drive (offsite) will result in the loss of native oak trees. (Draft EIR, p. I-34.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

The extension of Monument Springs Drive to the project site will result in the removal of approximately 25 interior live or blue oak trees. Placer County acknowledges the importance of native trees and has a tree preservation ordinance that prohibits the following events from occurring without County approval: removal of landmark or preserved trees or groves of native trees, native tree corridors, and significant stands of native tree habitats. Placer County's Tree Preservation Ordinance does not issue a tree permit or provide discretionary approval for any development activity within a riparian zone until environmental impacts within the riparian zone are identified, an environmental determination is made, and the mitigation measures identified. Additionally, no development activity shall be permitted until any Streambed Alteration Agreement or mitigation agreements required by the California Department of Fish and Game have been completed. No person, firm, corporation or County agency shall conduct any Development Activities within the Protected Zone of any Protected Tree on public or private land, or harm, destroy, kill or remove any Protected Tree unless authorized by a Tree Permit or as permitted pursuant to approval of a Discretionary Project. The project applicant must comply with the Placer County Tree Preservation Ordinance and the above-mentioned permits in order to ensure the impact will be less than significant. (Draft EIR, p. I-34.)

Mitigation Measures:

The following mitigation measure complies with local ordinances and will reduce the impact at the project site:

REQ-MM The project applicant shall comply with the provisions of the Placer County Tree Ordinance. (Draft EIR, p. I-34.)

Impact M-2: The Project, in combination with future development in the City, will create demand for additional law enforcement services and facilities. (Draft EIR, p. M-5.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

As the City grows, police protection services will need to be increased to provide adequate levels of protection. Future police staffing and facilities requirements under both moderate and high population growth scenarios to the year 2010 were projected in the Rocklin Public Facilities Master Plan (February 1988). The Project is in conformance with the level of development anticipated in the City of Rocklin General Plan for the project site and the anticipated demand for additional law enforcement services. In the future, additional space will be required to accommodate police facilities. Funds for future police staffing and facilities will come from revenues generated by sales and property taxes from development within the City. In addition, the project developer will comply with the City of Rocklin Construction Tax. In case of shortfalls, the Rocklin City Council has the authority to increase Police Department funding commensurate with the need to hire new personnel and equipment; however, such a course of action could reduce funding for other City services. The project's contribution is not considered cumulatively considerable; therefore, cumulative impacts for police protection services will be less than significant. (Draft EIR, pp. M-5, M-6.)

Mitigation Measures:

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

REQ-MM

The project applicant shall comply with the provisions of the City of Rocklin Construction Tax (Section 3.16 of the Rocklin Municipal Code), for the acquisition and development of parks, open space, bike trails, public buildings, and fire equipment needed as a result of increased development within the City. This mitigation measure to be implemented at the time of issuance of Building Permits. (Draft EIR, p. M-5.)

Impact M-3: The Project will increase demand for fire protection and emergency services. The project will require less than one additional fire personnel. (Draft EIR, p. M-10.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

The Project will slightly increase the need for additional fire personnel and equipment because the City's population will be increased. Using the generally accepted staffing ratio of 1.0 fire department personnel per 1,000 residents, the Project will generate the need for less than one additional fire personnel, based on a project population of 309 people. The desired staffing level is intended as a guide for the fire department. The ratio may be higher or lower at certain times depending on the number of engine companies placed into service. (Draft EIR, p. M-10.)

The primary funding for the Fire Department comes from the City's General Fund. Revenue for the City's General Fund is generated by sales tax, property tax, and other sources. It is anticipated that the Project's contribution to the City's General Fund through property and sales tax revenues will partially pay for the extension of fire protection services to the site. In addition, a Construction Tax is collected as a part of the building fee for purposes that include the acquisition of fire equipment needed as a result of increased development within the City. (Draft EIR, p. M-10.)

Assuming proper levels of staffing, there are no major concerns regarding the provision of fire protection service to the site. Fire services will be provided by Fire Station No. 1, located within two miles of the project site. The planned roadway system through the project site will be required to provide adequate access to all phases of development and will eliminate obstacles for fire protection services. (Draft EIR, p. M-10.)

Mitigation Measures:

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

REQ-MM

The project applicant shall comply with the provisions of the City of Rocklin Construction Tax (Section 3.16 of the Rocklin Municipal Code), for the acquisition and development of parks, open space, bike trails, public buildings, and fire equipment needed as a result of increased development within the city. This mitigation measure to be implemented

at the time of issuance of Building Permits.

REQ-MM

The project applicant shall comply with the provisions of the Uniform Fire Code (adopted as Chapter 15.04 of the Rocklin Municipal Code). This mitigation measure to be implemented at the time of issuance of Building Permits.

(Draft EIR, p. M-10.)

Impact M-4: The Project can result in the placement of residences farther than the two road mile service area of the closest fire station. (Draft EIR, p. M-11.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

The basic criteria used in assessing adequate response to potential fires and related emergencies is the published Insurance Services Offices (ISO) guidelines. Response times are dependent upon several factors including the volume of calls being received, traffic, weather conditions and personnel. The Rocklin Fire Department (RFD) uses a relatively constant and measurable factor, such as road miles from fire stations to a Project, to assess the availability of fire protection services. The adopted standard and the General Plan goal distance for single-family dwellings is two road miles from the fire station to all points in the project site. The nearest fire station to the project site is Fire Station No. 1. This station is located approximately two road miles from the Project site. This distance can be further reduced when construction of the Monument Springs Bridge is completed. Response time to the site is expected to be within the desired goal of a five minute response time. (Draft EIR, p. M-11.)

Mitigation Measures:

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

REQ-MM

The project applicant shall comply with the provisions of the Uniform Fire Code (adopted as Chapter 15.04 of the Rocklin Municipal Code). (Draft EIR, p. M-11.)

Impact M-7: The Project, in combination with future development in the City, will create demand for additional fire protection and emergency services. (Draft EIR, p. M-12.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

Explanation:

As the City grows, fire protection services will need to be increased if current ratios of personnel to residents are to be maintained or improved. Funds for future fire department staffing and facilities will come from revenues generated by the City's Construction Tax, and sales and property taxes from development within the City, including the Project. The project's contribution is not considered cumulatively considerable. Therefore, the cumulative impact is considered less than significant. (Draft EIR, p. M-13.)

Mitigation Measures:

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

REQ-MM The project applicant shall comply with the provisions of the City of Rocklin Construction Tax (Section 3.16 of the Rocklin Municipal Code), for the acquisition and development of parks, open space, bike trails, public buildings, and fire equipment needed as a result of increased development within the City. This mitigation measure to be implemented at the time of issuance of Building Permits.

REQ-MM The project applicant shall comply with the provisions of the Uniform Fire Code (adopted as Chapter 15.04 of the Rocklin Municipal Code). This mitigation measure to be implemented at the time of issuance of Building Permits.

(Draft EIR, pp. M-12, M-13.)

Impact M-10: Implementation of the Project will increase demand for park facilities. (Draft EIR, p. M-21.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

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Explanation:

The City of Rocklin General Plan uses a park standard of five acres per 1,000 residents. Based on the anticipated population of 309 new residents, a total of approximately 1.5 acres of parkland will be required for this project. The Project includes a total of 23.5 acres of passive open space, but does not provide any active parkland. City staff has indicated that due to the topography of the project site, the provision of an on-site park is not feasible. (Draft EIR, p. M-22.)

Therefore, the project applicant will be required to contribute an additional \$1,985.00 per single-family dwelling unit into the City's fund to acquire active parkland elsewhere in the City. The City is currently purchasing a six-acre site in the Quarry Ridge project to be used for active parkland. Therefore, impacts associated with the increased demand for park facilities will be less than significant. (Draft EIR, p. M-22.)

Mitigation Measures:

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

REQ-MM

The project applicant shall comply with the provisions of the City of Rocklin Construction Tax (Section 3.16 of the Rocklin Municipal Code), for the acquisition and development of parks, open space, bike trails, public buildings, and fire equipment needed as a result of increased development within the City. This mitigation measure to be implemented at the time of issuance of Building Permits.

REQ-MM

The project applicant shall comply with the provisions of the Park Development Fees (Chapter 16.28 and 17.71 of the Rocklin Municipal Code) with parkland dedication and/or payment of park development fees.

REQ-MM

The project applicant shall comply with the provisions of the Community Park and Recreational Facilities Improvement Fee (Resolution #99-82).

(Draft EIR, p. M-22.)

Impact M-11: The Project, in combination with other development in the City, will increase the demand for park facilities. (Draft EIR, p. M-22.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

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Explanation:

The Project, in combination with other development within the City, will increase demand for park facilities. The Project does not include a park; however, the project applicant will pay a fee in accordance with the City's Municipal Code. This fee will be used by the City for the construction of additional parks throughout the City. Because the project's contribution to the provision of adequate parks is not cumulatively considerable, the cumulative impact on park facilities will be less than significant. (Draft EIR, pp. M-22, M-23.)

Mitigation Measures:

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

REQ-MM

The project applicant shall comply with the provisions of the City of Rocklin Construction Tax (Section 3.16 of the Rocklin Municipal Code), for the acquisition and development of parks, open space, bike trails, public buildings, and fire equipment needed as a result of increased development within the City. This mitigation measure to be implemented at the time of issuance of Building Permits.

REQ-MM

The project applicant shall comply with the provisions of the Park Development Fees (Chapters 16.28 and 17.71 of the Rocklin Municipal Code) with parkland dedication and/or payment of park development fees.

REQ-MM

The project applicant shall comply with the provisions of the Community Park and Recreational Facilities Improvement Fee (Resolution #99-82).

(Draft EIR, p. M-22.)

Impact P-1: Construction and occupancy of the Project can result in the use, generation, storage, and disposal of hazardous materials within the project site. (Draft EIR, p. P-8.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15091, 15126.4, subd. (a)(3).)

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,