### **DRAFT** Project Alternatives

CEQA requires that an environmental impact report (EIR) describe a reasonable range of feasible alternatives to a project, or to the location of a project, that could substantially reduce one or more of the project's significant environmental impacts while meeting most or all of the project's objectives. The EIR is required to analyze the potential environmental impacts of each of the alternatives, although not at the same level of detail as the project. The level of detail must be sufficient to allow comparison of the respective merits of the alternatives with the impacts of the proposed project.

The requirement for a "reasonable range" of alternatives is not specific as to the number of alternatives to be considered in the EIR. State CEQA Guidelines Section 15126.6(f) explains that the "range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice" and that "the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." An EIR is not required to analyze every conceivable alternative to a project. In addition, an EIR need not consider an alternative whose effects cannot be reasonably ascertained, whose implementation is remote and speculative, or that would not achieve the basic project objectives. State CEQA Guidelines Section 15126.6(e) requires that the EIR evaluate a "no project" alternative.

The alternatives section of the TGPA/ZOU EIR will include a description of potential alternatives to the proposed project that were considered, identify alternatives that were eliminated from further consideration and reasons for dismissal, and analyze three alternatives in comparison to the potential environmental impacts associated with the proposed project.

The scoping process for the TGPA/ZOU EIR is complete. Scoping is the mechanism used to identify the range of environmental issues to be addressed in the EIR. As the EIR preparation phase of the CEQA process gets underway, the County will work to identify the alternatives to be addressed in the EIR. Below, for the Board's consideration, is a brief description of a number of potential alternatives to be considered in the TGPA/ZOU EIR. It is not anticipated that all these alternatives will be selected for analysis in the EIR. CEQA requires a "reasonable range" of alternatives, not an exhaustive consideration of all possible alternatives. Additional alternatives may be identified during the environmental analysis process.

The following summarizes proposed alternative being considered for analysis in the EIR. Following a screening process, the selected alternatives will be developed to a level of detail appropriate for analysis in the EIR and comparison to the impacts of the proposed project. Pursuant to State CEQA Guidelines Section 15126.6(d), alternatives are not required to be analyzed in the EIR at the same level of detail as the proposed project.

#### Methodology

The potential alternatives presented in this memo were developed based on the fundamental objectives of the TGPA/ZOU project as defined by the Board and in accordance with the requirements of State CEQA Guidelines Section 15126.6: *Consideration and Discussion of Alternatives to the Proposed Project in EIRs*. In addition, comments provided to the County during the scoping process for the EIR were reviewed

for ideas for alternatives related to reducing potential impacts of the proposed project and to identify specific concerns related to potential environmental impacts of the proposed project that could potentially be addressed by alternatives.

### Alternative 1—No Project Alternative

State CEQA Guidelines Section 15126.6e(3) describes the requirement that for a project that is a revision of an existing land use plan or policy, the "no project" alternative "will be the continuation of the existing plan, policy or operation into the future." Therefore, for the TGPA/ZOU EIR, the No Project Alternative will consist of the continuation of the existing adopted General Plan and Zoning Ordinance. Under this alternative, no changes would be made to the General Plan or the Zoning Ordinance, and the County would continue to operate under its adopted policies and regulations. The No Project Alternative will rely on build-out assumptions to be developed with County staff.

#### Alternative 2— Transit Connection Alternative

One of the objectives of the TGPA project is to establish policies consistent with state and federal law which includes the Sustainable Communities and Climate Protection Act of 2008 (a.k.a SB375). This new law is aimed at reducing greenhouse gas emissions through regional land use and transportation planning. SACOG has adopted a Metropolitan Transportation Plan 2035 (MTP 2035) that includes a sustainable communities strategy (SCS) compliant with SB 375's requirements. El Dorado County is not obligated to conform its general plan or zoning ordinance to the MTP 2035, however, it may independently choose to adopt policies that would be consistent with SB 375. The proposed TGPA includes the following policies addressing the sustainable communities strategy as part of SACOG's MTP.

**Policy TC – 8b** The County shall review the EDCTC's Regional Transportation Plan and SACOG's Metropolitan Transportation Plan, including the Sustainable Communities Strategy, each time it reviews and updates the General Plan and any master plan, strategy, and zoning, to ensure overall consistency among all of these plans and strategies to allow for CEQA streamlining and to ensure eligibility for State transportation and housing funding.

**Policy TC – 8c** The County shall work with SACOG to ensure that cumulative impacts for any Regional Transportation Plan are analyzed pursuant to CEQA so that applicable projects may benefit from CEQA streamlining as provided by State law.

**Policy TC – 8d** The County in working with the El Dorado County Transit Authority shall identify community level Transit Priority Areas (TPA) in areas planned for residential and mixed use projects that are consistent with land use designations, densities, building intensities, and all other applicable policies.

Under this alternative, the TGPA/ZOU would require a set higher minimum density, identifies specific sites for mixed use development and may include land use designation changes when necessary to achieve community connectivity. In addition would include linkages between land use and transportation to provide a detailed policy basis for projects meeting the definitions of consistency with the SACOG MTP/SCS and qualifying for CEQA streamlining in the future. Because El Dorado County does not have transit service sufficient to qualify any areas as "transit priority projects" under SB 375, this would focus on areas with good transit connections suitable for mixed use development. Details could include higher General Plan land use densities in Rural Communities.

### Alternative 3— Higher Zoning Density in Community Regions and Rural Centers Alternative

The proposed project makes zoning consistent with General Plan land use designations by changing the zoning of inconsistent zoned land to the minimum density level of the General Plan designation. Under the Higher Zoning Density in Community Regions and Rural Centers Alternative, zoning consistency would be at the maximum density level of the General Plan designation. Analysis of this alternative would require careful analysis of the forecasts prepared for the project, as General Plan buildout could theoretically be the same under this alternative as under the proposed project.

## Alternative 4— Reduce Development Potential in Specific Areas with Traffic Constraints Alternative

Under this alternative, for areas where the traffic analysis identifies significant impacts related to increased traffic resulting from General Plan implementation, zoning designations would be altered to reduce the development potential, thereby reducing the traffic generated on impacted roadways. Zoning changes would be developed once impacts of the proposed project are better understood—later in the EIR preparation process, but prior to release of the Draft EIR—to allow this alternative to be better focused on addressing potential impacts.

# Alternative 5—Lower Zoning Densities in Community Regions and Rural Centers Alternative

A key piece of the TGPA/ZOU is the set of policies aimed at focusing development in Community Regions and Rural Centers. Many of the comments from the public during the EIR scoping process presented concerns about potential impacts of increased growth resulting from higher densities in these areas, including traffic, noise, visual impacts, and land use conflicts on the edges of these communities. Under this alternative, densities for these areas would be lower than those proposed in the project. The specific amount of reduction should be developed once impacts of the proposed project are better understood—later in the EIR preparation process, but prior to release of the Draft EIR —to allow this alternative to be better focused on addressing potential impacts.

### Alternative 6—Expand County Recreational Sites Alternative

Several comments received during the scoping period identified areas of the County as being underserved with County recreational sites and facilities. Under this alternative, revisions to the park to population ratio in the General Plan would be considered and opportunity sites would be identified in the Zoning Ordinance for County parks.

### Alternative7—Lower Densities Outside of Community Regions, Rural Centers, Meyers Community, and Specific Plan Areas for Protection of Agriculture and Natural Resource Lands Alternative

Under this alternative, most new residential and nonagricultural development would be directed to developed areas or other community regions and rural centers. This alternative could address potential impacts that may be identified related to conversion of farmland.

## Alternative 8 – Community Region and Rural Center Planning Areas Revision Alternative

Several comments received during the scoping period identified adding, deleting or reducing the area currently within the Community Region of Camino-Pollock Pines and El Dorado Hills. Under this alternative, the area currently identified as the Camino-Pollock Pines and El Dorado Hills Community Regions would be amended to reduce the area within the Community Regions and may include land use designation changes or application of a General Plan overlay as required to maintain consistency with related General Plan policies.

### **Required Approvals**

- Adoption of the General Plan amendments by resolution of the Board of Supervisors
- Adoption of the updated Zoning Ordinance by the Board of Supervisors
- Adoption of proposed new Design Guidelines for mixed use, traditional neighborhood design and multi-family development

### **Related Projects**

- Oak Woodlands General Plan Policies Amendments and EIR
- Updated Sign Ordinance
- 2013 Housing Element Update