

CHAPTER FOUR

EVALUATION OF ALTERNATIVES

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4.1 Introduction

The California Environmental Quality Act and the implementing CEQA Guidelines require that alternatives to the proposed project be discussed in the EIR. The value of such discussion is to inform public decision-makers of the differential environmental impacts which may be associated with each potential alternative, and to enable a reasoned judgment to be made as to which alternative to the proposed project may be environmentally superior. Section 15126.6 of the CEQA Guidelines provides the following description of what should be included in the alternatives discussion in an EIR:

- (a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- (b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- (c) Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be

used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

- (d) Evaluation of Alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- (e) “No Project” alternative.
 - (1) The specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The “no project” alternative analysis is not the baseline for determining whether the proposed project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).
 - (2) The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.
 - (3) A discussion of the “no project” alternative will usually proceed along one of two lines:
 - (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative

plans would be compared to the impacts that would occur under the existing plan.

- (B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the “no project” alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.
 - (C) After defining the “no project” alternative using one of these approaches, the lead agency should proceed to analyze the impacts of the “no project” alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- (f) Rule of reason. 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. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.
- (1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should

consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

- (2) Alternative locations.
 - (A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
 - (B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.
 - (C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of the potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.
- (3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

The sections of the chapter that follow present a description of the alternatives considered and an analysis of the alternatives in the context of CEQA and the CEQA Guidelines. The range of alternatives addressed includes an evaluation of the “no project” alternative (which is required to be addressed), a reduced size alternative, and an avoidance of sensitive areas alternative. Finally, this chapter presents an analysis of the comparative environmental superiority of the various alternatives, as required by CEQA.

4.2 Project Objectives

As stated in Chapter Two of this Draft EIR, the objectives of the project proponent for this project are as follows:

- provide the public with regional shopping opportunities, including retail, dining, entertainment and lodging components.
- provide a regional shopping experience that is of a quality consistent with the culture of Shasta County.
- provide a regional “one-stop” destination whereby commerce is intertwined with transportation in Shasta County by utilizing the existing transportation services in the I-5 corridor and encourage alternative forms of transportation thereby reducing carbon emissions;
- construct buildings and improvements in the development that exceed state energy efficiency standards;
- attract regional retail customers currently using the I-5 corridor to commute through Shasta County that are currently not stopping and shopping in the County;
- develop a regional shopping destination that promotes Shasta County’s economic stability and diversity by expanding and providing a stable, long-term revenue base to Shasta County.
- develop a regional shopping center development of sufficient size that it will attract new retailers into the Shasta County market and address such retailer’s location, visibility, co-tenancy and traffic requirements and ensure long-term viability.
- provide new job opportunities for Shasta County;
- develop a regional commercial shopping development that provides a feasible economic return to its investors and Shasta County.

4.3 Alternatives Rejected

According to the CEQA Guidelines, two major provisions are necessary for an adequate alternative site analysis—feasibility and location. The EIR should consider alternate project locations if a significant project impact could be avoided or substantially lessened by moving the project to an alternate site.

Various potential off-site locations were identified for possible analysis in this document (see [Figure 4-1](#)). Vacant parcels within this 10 mile radius were not large enough to accommodate a regional retail shopping center, had insufficient access to I-5, or would not result in the elimination or lessening of any environmental impacts.

Based on the above, analysis of alternative project sites was eliminated from further consideration.

4.4 Project Alternatives

The following project alternatives have been developed for the proposed project, consistent with CEQA requirements and the project objectives stated above. The following represent a reasonable range of alternatives to the project:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Size Alternative
- Alternative 3: Avoidance of Sensitive Areas Alternative

4.4.1 NO PROJECT ALTERNATIVE

In accordance with Section 15126.6(e)(3)(B) of the State CEQA Guidelines, the No Project alternative consists of an analysis of the circumstances under which the proposed project does not proceed. This alternative entails a general discussion of what can reasonably be expected to occur on the project site in the foreseeable future if the proposed project is not approved, based on the existing general plan land use designations, zoning, and available infrastructure and services.

The majority of the project site is currently designated by the Shasta County General Plan as Part-Time Agricultural (A-cg). This portion of the site is zoned Limited Agriculture (A-1) which allows for only one residence and various agricultural uses. A small portion of the site near its southern boundary is designated Commercial (C) and zoned Planned Development (PD). No public water, sewer, or drainage infrastructure or services are currently provided to the site. Under this alternative, the parcels designated A-cg and zoned A-1 could be developed with 17 residences.

The No Project Alternative would not achieve any of the applicant's stated project objectives.

4.4.2 REDUCED SIZE ALTERNATIVE

The Reduced Size Alternative consists of an analysis of the proposed project reduced by approximately 50 percent or 46 acres. This reduced site would accommodate approximately 320,000 square feet of retail space. The most likely site plan for this reduced project would provide 9± five-acre home sites between the commercial site and surrounding residential development (assuming the current general plan and zoning would apply outside the commercial site).

This alternative would at least partially achieve the project objectives; however, because this alternative would provide for fewer commercial retail establishments it may reduce potential economic gains for the region and would limit the number of new businesses introduced to the area.

4.4.3 AVOIDANCE OF SENSITIVE AREAS ALTERNATIVE

The Avoidance of Sensitive Areas Alternative consists of an analysis of the proposed project in which environmentally sensitive areas are avoided in order to lessen potential environmental impacts (see [Figure 4-2](#)). Areas or features to be avoided include the irrigation facilities that provide some degree of wildlife habitat and an area that may potentially contain remnants of significant cultural resources. This alternative also includes the use of native vegetation throughout the site to reduce aesthetic impacts. Since this alternative is conceptual, the dimensions and location of each retail site have not been determined; however, it would entail a reduction in the total developable area and therefore fewer businesses.

This alternative would reduce the developable area on the project site to the level of a community shopping center and would not fully meet all of the project objectives as a regional shopping center. The new design features that would be required to implement this alternative would be significantly more costly to construct.

4.5 Analysis of Project Alternatives

Each of the alternatives is analyzed below for potential impacts on the environment. The impact discussions are qualitative, and focus on the relative comparative level of impact, as compared to the proposed project. Under each heading, a statement is made indicating whether the impacts created by the alternative are less than, equal to, or greater than those in the proposed project. A summary of these statements is found at the conclusion of this section.

4.5.1 NO PROJECT ALTERNATIVE

Aesthetics

Because the project site could be developed with 17 units of low-density residential housing and approximately six acres of commercial uses the existing visual character and quality of the site would be changed from current agricultural uses, but not to as much of an extent as with the proposed project. Neither the proposed project nor this alternative would result in impacts to views or visual resources within a scenic highway. Under this alternative, impacts related to aesthetics are *reduced* compared to the proposed project.

Agricultural Resources

Since 20 residential housing units could be developed, a partial conversion of Prime Farmland or other category of Important Farmland to non-agricultural uses could occur. Conflicts could occur on-site between houses and commercial development (potential development of approximately six acres of commercially zoned land at the southwestern corner of the project site) and agricultural activities. Additionally, other land designated as Important Farmland could be indirectly converted to nonagricultural uses and land use conflicts or nuisance complaints could be created. Because a portion of the project site could remain in agricultural production, at least a portion of the site could remain in compliance with the existing agricultural zoning. Existing irrigation facilities would likely continue to be used. Neither the proposed project nor

this alternative would conflict with an active Williamson Act contract. Under this alternative, impacts related to agriculture resources are *reduced* compared to the proposed project.

Air Quality

With development of 17 single-family dwelling units and approximately six acres of commercial uses, this alternative could result in the generation of up to approximately 3,000 new vehicle trips per day in the vicinity of the project site. Residential construction activities such as grading, leveling, earthmoving and excavation would generate dust. Diesel truck trips generated by the development would generally be limited to the period of construction, and there would be no potential for related health risks. Under this alternative, impacts related to air quality are *reduced* compared to the proposed project.

Biological Resources

With development of 17 single-family residences and approximately six acres of commercial uses, special-status species and their habitat on the project site could be impacted, although coverage of the site with structures and pavement would be reduced compared to the proposed project. Movement of wildlife in the region could be interrupted as a result of additional fencing. Neither the proposed project nor this alternative would conflict with an adopted Habitat Conservation Plan or local policies protecting biological resources. There would be limited potential for cumulative impacts to biological resources. Under this alternative, impacts on biological resources are *reduced* compared to the proposed project.

Cultural Resources

Construction of single-family dwelling units and approximately six acres of commercial uses could disturb or destroy buried cultural resources, although the impact would be reduced compared to the proposed project because of the lesser amount of square footage and pavement. Under this alternative, impacts related to cultural resources are *reduced* compared to the proposed project.

Geology, Soils, and Mineral Resources

Neither the proposed project nor this alternative would expose people or structures to potential substantial adverse effects related to the rupture of a known earthquake fault, ground failure including liquefaction, landslides, or unstable/expansive soils. Construction of 17 single-family dwelling units and approximately six acres of commercial uses could cause soil erosion or loss of topsoil and would require mitigation. Under this alternative, impacts related to geology and soils are generally *unchanged* compared to the proposed project.

Hazards and Hazardous Materials

Development of six acres of commercial uses proximate to I-5 could result in the use of, transport and/or storage of hazardous materials such as gasoline, oil, grease, paints, and other materials related to automotive maintenance and repair. The use, transport and storage of

hazardous materials are regulated at the federal, state and local levels. Compliance with existing regulations will reduce the impacts associated with the use, storage, transport, and accidental release of hazardous materials to a less-than-significant level. Additionally, the majority of the site would be used for agricultural operations and residential landscaping, which also routinely use hazardous materials such as pesticides and fertilizers. Neither the proposed project nor this alternative would emit any hazardous materials or otherwise affect nearby schools.

The project site is not included on a list of hazardous materials sites; however, two leaking underground storage tanks and several other listed hazardous facilities were identified near the site. According to the Phase 1 Site Assessment prepared for the project site, these tanks and facilities do not pose a threat to the project site under either project scenario. Also based on the Phase 1 Site Assessment, existing soil contamination from current and past agricultural practices and equipment storage is considered less than significant under either scenario. Under this alternative, impacts related to hazards and hazardous materials are *reduced* compared to the proposed project.

Hydrology and Water Quality

With development of 17 single-family residences and approximately six acres of commercial uses, up to 15,000 gallons of sewage per day could be generated. Since this sewage would be discharged to on-site septic tanks, potential impacts to groundwater would be created. An additional 30,000 gallons of water per day would be pumped from the aquifer underlying the project site through use of approximately 21 individual wells. Potential impacts to neighboring wells could occur. Drainage patterns on the site would be altered, causing additional erosion or siltation. Stormwater runoff would be increased, and there would be potential for new on- or off-site flooding or exceedance of the planned drainage infrastructure. The additional residential structures could potentially impede or redirect flood flows. Under this alternative, impacts related to hydrology and water quality are *greater* compared to the proposed project.

Land Use, Planning, Population and Housing

Neither this alternative nor the proposed project would result in the division of an established community. The project site would be developed with single-family residences/small farms and approximately six acres of commercial uses in compliance with current land use policy, without any required amendments. Conflicts could potentially occur between residential, commercial, and farm uses. Pressure would be reduced on surrounding uses to convert to commercial uses. Under this alternative, impacts related to land use are *reduced* compared to the proposed project.

Noise

Up to approximately 3,000 additional daily trips would be generated in the area of the project site; therefore, traffic noise levels would be increased but not to the extent resulting from the proposed project. Residential and commercial HVAC systems would be installed on the project site. Additionally, new temporary sources of noise such as construction activities would be created on the site. The existing residential structures adjacent to the site would experience

smaller increases in noise levels compared to the proposed project. Under this alternative, impacts related to noise are *reduced*.

Public Services and Recreation

Under this alternative because the project site could be developed with 17 single-family homes and approximately six acres of commercial uses, additional calls for service would be generated for the Shasta County Sheriff's Department and Fire Department. This alternative would require mitigation for impacts to fire, police and schools and would also result in greater demand for parks and recreation services. Under this alternative, impacts related to public services are *greater* compared to the proposed project.

Traffic and Circulation

Up to approximately 3,000 additional vehicle trips could be generated under this alternative, but impacts to intersections, roadway segments or I-5 ramps in the vicinity of the project site would not be as substantial as under the proposed project. Hazards or unsafe conditions due to pedestrian and vehicle conflicts, design features, or incompatible uses would also be reduced. The existing emergency access to the site would remain, and no new emergency access would be needed. The requirement for additional parking would be reduced, and conflicts with policies supporting public transportation would be reduced. Under this alternative, impacts related to transportation and traffic are *reduced* compared to the proposed project.

Utilities and Service Systems

Wastewater discharge from approximately six acres of commercial uses and up to 17 separate septic tanks would be created on the project site under this alternative, with the potential to exceed wastewater treatment requirements of the Regional Water Quality Control Board. Since water and wastewater facilities would be provided by individual residences and commercial uses, no impacts to public water and sewer providers would occur. Additional solid waste would be generated on the project site, but the impact to local solid waste collection and disposal service would be reduced. Under this alternative, impacts related to utilities and service systems would be *reduced* compared to the proposed project.

Global Climate Change

With development of 17 single-family dwelling units and approximately six acres of commercial uses, this alternative could result in a considerable reduction in development related vehicle miles traveled (approximately 3,000 new vehicle trips per day in the vicinity of the project site). Diesel truck trips generated by the development would also be considerably reduced and generally limited. Additionally, energy usage would be greatly diminished under this alternative with corresponding reduction in generation of greenhouse gases associated with the production of energy. Under this alternative, impacts related to global climate change are *reduced* compared to the proposed project.

4.5.2 REDUCED SIZE ALTERNATIVE

Aesthetics

Although a portion of the project site would be converted from agricultural and rural residential uses to primarily commercial uses, this alternative would be approximately 50 percent smaller and the remaining portion of the site would maintain its rural character, providing a visual buffer between the site and the residential uses to the north. Regardless, views of the site from surrounding areas as well as the overall visual character of the site would be substantially altered and the impact would remain significant and unavoidable. New sources of substantial light and glare would be created by both the proposed project and this alternative; however, the alternative would generate less light and glare due to the reduction in square footage. In addition, the visual buffer provided by this alternative would capture light and glare on the project site and shield adjacent uses. Under this alternative, impacts related to aesthetics are ***reduced*** compared to the proposed project.

Agricultural Resources

This alternative would result in the conversion of approximately 46 acres of Prime Farmland from agricultural uses to a commercial use which is 46 acres fewer than the proposed project. This alternative also has the potential to result in indirect conversion of surrounding farmland due to the creation of conflicting land uses and public nuisance complaints. Both this alternative and the proposed project would conflict with existing zoning for agricultural use and would impact existing irrigation facilities. Under this alternative, impacts related to agriculture resources are ***reduced*** compared to the proposed project.

Air Quality

Under this alternative, a smaller area would be exposed to construction activities that generate dust such as grading, leveling, earthmoving and excavation. However, this alternative would still require mitigation similar to the proposed project to minimize air quality impacts from dust generation. This alternative would attract fewer customers and employ fewer persons thereby generating fewer vehicle trips. New emissions of particulate matter and ozone precursors from vehicles would be less than the proposed project; however, this alternative would still require similar mitigation to minimize such emissions. Fewer new diesel truck trips would be generated by this alternative reducing potential health risks. Under this alternative, impacts related to air quality are ***reduced*** compared to the proposed project.

Biological Resources

The conversion of the project site would result in the alteration of natural habitat and therefore has the potential to impact special-status species. However, approximately half the site would not be developed and would remain in its current condition. Neither the proposed project nor this alternative would conflict with an adopted Habitat Conservation Plan or other local policy protecting biological resources. Under this alternative, impacts related to biological resources are ***reduced*** compared to the proposed project.

Cultural Resources

Preconstruction and construction activities on the site have the potential to impact unknown cultural resources. However, due to the reduction of the project site by half the potential for such impacts are reduced. The area identified as potentially containing cultural resources would still be impacted and would require mitigation similar to the proposed project. Under this alternative, impacts related to cultural resources are ***unchanged*** compared to the proposed project.

Geology, Soils and Mineral Resources

This alternative would result in the same impacts related to geology and soils as the proposed project. Under this alternative, impacts related to geology and soils are ***unchanged*** compared to the proposed project.

Hazards and Hazardous Materials

This alternative would result in the same impacts related to hazards and hazardous materials as the proposed project. Under this alternative, impacts related to hazards and hazardous materials are ***unchanged*** compared to the proposed project.

Hydrology and Water Quality

This alternative would require a lesser amount of groundwater pumped to serve the project and a reduced potential to impact nearby wells. Neither this alternative nor the proposed project would result in significant erosion or siltation due to drainage pattern alteration. Due to the smaller area of impervious surface under this alternative, a lesser amount of storm water runoff would be generated. However, neither this alternative nor the proposed project would result in potential for on- or off-site flooding or the exceedance of the capacity of the planned drainage infrastructure due to increased runoff. Fewer structures would be constructed on the project site, thus reducing the potential need to impede or redirect flood flows. Under this alternative, impacts related to hydrology and water quality are ***reduced*** compared to the proposed project.

Land Use, Planning, Population and Housing

Neither this alternative nor the proposed project would result in the division of an established community. A general plan amendment and rezoning would still be required for the commercial portion of this alternative in order to comply with adopted land use policies. This alternative would provide 9± five-acre home sites between the commercially developed portion of the site and existing residential uses to the north, therefore, the potential for land use conflicts would not be reduced. This alternative would provide fewer retail sites and would have less potential to contribute to cumulative urban decay impacts on the City. Under this alternative, impacts related to land use are generally ***unchanged*** compared to the proposed project.

Noise

Fewer vehicles trips would be generated by this project alternative and would therefore result in lower noise levels from traffic. Additionally, fewer retail establishments would be constructed; therefore, fewer stationary or ongoing sources of noise such as HVAC units and delivery trucks would be located on the site. A buffer would be provided between the site and surrounding residential properties; therefore, the adjacent residential properties would be exposed to lower noise levels. Under this alternative, impacts related to noise are *reduced* compared to the proposed project.

Public Services and Recreation

Fewer retail establishments would be constructed under this alternative and would therefore attract fewer patrons and employ fewer people. This alternative would result in fewer calls for police protection services. Fewer facilities would also result in fewer fire hazards and calls for fire protection services. Regardless, this alternative would impact both police and fire protection services and would require the payment of a fair share of improvements required to maintain service levels. Similarly, although this alternative would generate fewer new students, the payment of school impact fees would still be necessary to offset impacts to local public schools. This alternative consists of the same commercial uses as the proposed project and would not impact parks or be required to dedicate parkland or pay in lieu park fees. Under this alternative, impacts related to public services are *reduced* compared to the proposed project.

Traffic and Circulation

This alternative would attract fewer customers and employ fewer persons, thereby generating fewer vehicle trips in the vicinity of the site. Therefore, impacts to area intersections, roadway segments, and Interstate 5 ramps would be lesser. This alternative would have the same potential for conflicts between vehicles, pedestrians and livestock as the proposed project, as well as similar potential to result in hazards from design features and similar emergency access needs. Therefore the proposed project would require mitigation similar to that of the proposed project for each of these potential impacts. This alternative would also require a parking supply consistent with the County Zoning Code. Neither this alternative nor the proposed project would conflict with adopted policies related to public transportation. Under this alternative, impacts related to transportation and traffic are *reduced* compared to the proposed project.

Utilities and Service Systems

This alternative would result in less wastewater discharged to the groundwater aquifer underlying the project site and would have a lesser potential to violate RWQCB requirements. However, this alternative would still require mitigation similar to the proposed project to ensure that the on-site wastewater treatment facility is properly designed and constructed. Both this alternative and the proposed project would provide all necessary water, wastewater, and drainage facilities on the project site. This alternative would require less water for operations and would therefore have a lesser impact on the aquifer. This alternative would also generate less solid waste and would have a lesser impact on local solid waste collection and disposal services.

Under this alternative, impacts related to utilities and services systems are *reduced* compared to the proposed project.

Global Climate Change

This alternative would attract fewer customers and employ fewer persons thereby generating fewer vehicle and diesel truck trips. Although greenhouse gas emissions from vehicles would be less than the proposed project, this alternative would still require similar mitigation to minimize such emissions. . Additionally, energy usage would be diminished under this alternative with corresponding reduction in generation of greenhouse gases associated with the production of energy. Under this alternative, impacts related to global climate change are *reduced* compared to the proposed project.

4.5.3 AVOIDANCE OF SENSITIVE AREAS ALTERNATIVE

Aesthetics

Although the project site would be converted from agricultural and rural residential uses to primarily commercial uses, this alternative would blend with the existing rural character of the area by incorporating native vegetation, riparian corridors, and open space areas. Regardless, views of the site from surrounding areas as well as the overall visual character of the site would be substantially altered and the impact would remain significant and unavoidable. New sources of substantial light and glare would be created by both the proposed project and this alternative, although this alternative would generate less light and glare due to the reduced square footage. In addition, the preservation of some existing, mature trees would capture light and glare on the project site and shield adjacent uses. Under this alternative, impacts related to aesthetics are *reduced* compared to the proposed project.

Agricultural Resources

This alternative would result in the conversion of approximately 80 acres of Prime Farmland from agricultural uses to a commercial use. This alternative also has the same potential to result in indirect conversion of surrounding farmland due to the creation of conflicting land uses and public nuisance complaints. Both this alternative and the proposed project would conflict with existing zoning for agricultural use. However, this alternative would avoid impacts to existing agricultural irrigation facilities on the site. Under this alternative, impacts related to agriculture resources are *reduced* compared to the proposed project.

Air Quality

Under this alternative, a smaller area would be exposed to construction activities that generate dust such as grading, leveling, earthmoving and excavation. However, this alternative would require mitigation similar to the proposed project to minimize air quality impacts from dust generation. This alternative would attract fewer customers and employ fewer persons thereby generating fewer vehicles trips. New emissions of particulate matter and ozone precursors from vehicles would be lesser than the proposed project; however, this alternative would still require

similar mitigation to minimize such emissions. Fewer new diesel truck trips would be generated by this alternative reducing potential health risks. Under this alternative, impacts related to air quality are *reduced* compared to the proposed project.

Biological Resources

The conversion of the project site under this alternative would result in the alteration of natural habitat and therefore has the potential to impact special-status species. However, the existing irrigation facilities and associated riparian habitat would be preserved. Neither the proposed project nor this alternative would conflict with an adopted Habitat Conservation Plan or other local policy protecting biological resources. Under this alternative, impacts related to biological resources are *reduced* compared to the proposed project.

Cultural Resources

Preconstruction and construction activities on the site have the potential to impact unknown cultural resources. However, the portion of the site identified as potentially containing significant cultural resources would be avoided, reducing the potential for disturbing any unknown resources. Under this alternative, impacts related to cultural resources are *reduced* compared to the proposed project.

Geology, Soils and Mineral Resources

This alternative would result in the same impacts related to geology and soils as the proposed project. Under this alternative, impacts related to geology and soils are *unchanged* compared to the proposed project.

Hazards and Hazardous Materials

This alternative would result in the same impacts related to hazards and hazardous materials as the proposed project. Under this alternative, impacts related to hazards and hazardous materials are *unchanged* compared to the proposed project.

Hydrology and Water Quality

This alternative would require a lesser amount of groundwater pumped to serve the project and a reduced potential to impact nearby wells. Neither this alternative nor the proposed project would result in significant erosion or siltation due to drainage pattern alteration. Due to the smaller area of impervious surface and the preservation of some of the existing drainage infrastructure on the site, a lesser amount of storm water runoff would be generated. Neither this alternative nor the proposed project would result in potential for on- or off-site flooding due to increased runoff or the exceedance of the capacity of the planned drainage infrastructure. Fewer structures would be constructed on the project site, reducing the potential to impede or redirect flood flows. Under this alternative, impacts related to hydrology and water quality are *reduced* compared to the proposed project.

Land Use, Planning, Population and Housing

Neither this alternative nor the proposed project would result in the division of an established community. This alternative would provide a larger buffer between the proposed development and the existing residential uses to the north thereby reducing the potential for land use conflicts. Although this alternative would provide fewer retail establishments, it would still result in the potential relocation of businesses from the City of Redding. Therefore, this alternative would have similar fiscal and blighting impacts on the City. Under this alternative, impacts related to land use are ***unchanged*** compared to the proposed project.

Noise

Fewer vehicles trips would be generated by this project alternative and would therefore result in slightly lower noise levels from traffic. Additionally, fewer retail establishments would be constructed; therefore, fewer stationary or ongoing sources of noise such as HVAC units and delivery trucks would be located on the site. The adjacent residential properties would experience lower noise levels. Under this alternative, impacts related to noise are ***reduced*** compared to the proposed project.

Public Services and Recreation

Fewer retail establishments would be constructed under this alternative and would therefore attract fewer patrons and employ fewer people. This alternative would result in fewer calls for police protection services. Fewer facilities would also result in fewer fire hazards and calls for fire protection services. Regardless, this alternative would impact both police and fire protection services and would require the payment of a fair share of improvements required to maintain service levels. Similarly, although this alternative would generate fewer new students, the payment of school impact fees would still be necessary to offset impacts to local public schools. This alternative consists of the same commercial uses as the proposed project and would not be required to dedicate parkland or pay in lieu parks fees. Under this alternative, impacts related to public services are ***reduced*** compared to the proposed project.

Traffic and Circulation

This alternative would attract fewer customers and employ fewer persons thereby generating fewer vehicle trips in the vicinity of the site. Therefore, impacts to area intersections, roadway segments, and Interstate 5 ramps would be lesser. This alternative would have the same potential for conflicts between vehicles, pedestrians and livestock as the proposed project, as well as similar potential to result in hazards from design features and similar emergency access needs. Therefore the proposed project would require mitigation similar to that of the proposed project for each of these potential impacts. This alternative would also require a parking supply consistent with the County Zoning Code. Neither this alternative nor the proposed project would conflict with adopted policies related to public transportation. Under this alternative, impacts related to transportation and traffic are ***reduced*** compared to the proposed project.

Utilities and Service Systems

This alternative would result in less wastewater discharged to the groundwater aquifer underlying the project site and would have a less potential to violate RWQCB requirements. However, this alternative would still require mitigation similar to the proposed project to ensure that the on-site wastewater treatment facility is properly designed and constructed. Both this alternative and the proposed project would provide all necessary water, wastewater, and drainage facilities on the project site. This alternative would require less water for operations and would therefore have a lesser impact on water supplies. This alternative would also generate less solid waste and would have a lesser impact on local solid waste collection and disposal services. Under this alternative, impacts related to utilities and service systems are *reduced* compared to the proposed project.

Global Climate Change

Although not to the extent of the reduced size alternative, this alternative would attract fewer customers and employ fewer persons thereby generating fewer vehicle and diesel truck trips. Although greenhouse gas emissions from vehicles would be less than the proposed project, this alternative would still require similar mitigation to minimize such emissions. Additionally, energy usage would be diminished under this alternative with corresponding reduction in generation of greenhouse gases associated with the production of energy. Under this alternative, impacts related to global climate change are *reduced* compared to the proposed project.

4.6 Environmentally Superior Alternative

In accordance with the CEQA Guidelines §15126.6(d), this section compares the impacts of the three alternatives under consideration to those of the proposed project. [Table 4-1](#) shows whether each of the thirteen impact areas are unchanged, reduced, or greater, compared to the proposed project.

Table 4-1
Significance of Environmental Effects Under Alternatives Compared to Proposed Project

Impact Category	No Project Alternative	Reduced Size Alternative	Avoidance of Sensitive Areas Alternative
Aesthetics	Reduced	Reduced	Reduced
Agricultural Resources	Reduced	Reduced	Reduced
Air Quality	Reduced	Reduced	Reduced
Biological Resources	Reduced	Reduced	Reduced
Cultural Resources	Reduced	Unchanged	Reduced
Geology, Soils, and Mineral Resources	Unchanged	Unchanged	Unchanged
Hazards and Hazardous Materials	Reduced	Unchanged	Unchanged
Hydrology and Water Quality	Increased	Reduced	Reduced
Land Use, Planning, Population and Housing	Reduced	Unchanged	Unchanged
Noise	Reduced	Reduced	Reduced
Public Services and Recreation	Increased	Reduced	Reduced
Traffic and Circulation	Reduced	Reduced	Reduced

Impact Category	No Project Alternative	Reduced Size Alternative	Avoidance of Sensitive Areas Alternative
Utilities and Service Systems	Reduced	Reduced	Reduced
Global Climate Change	Reduced	Reduced	Reduced
Number of Impacts Reduced	11	10	11
Number of Impacts Increased	2	0	0
Number of Impacts Unchanged	1	4	3

Source: Quad Knopf, Inc.

Based upon the analysis contained and documented in Chapter Three of this EIR and the analysis presented above, the Avoidance of Sensitive Areas Alternative has been identified as the environmentally superior alternative among all the alternatives. Compared to the proposed project, this alternative reduces impacts in 11 of the 14 impact categories analyzed for the project (see Table 4-1). Although the No Project Alternative also reduces impacts in 11 categories, it increases impacts in two categories—Hydrology and Water Quality and Public Services. It should be noted that since the Avoidance of Sensitive Areas Alternative would reduce the developable area on the project site to the level of a community shopping center and would not fully meet all of the project objectives as a regional shopping center.