7.0 ALTERNATIVES TO THE PROPOSED PROJECT

The California Environmental Quality Act (CEQA) requires that “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” (State CEQA Guidelines §15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA. Key provisions of the State CEQA Guidelines on alternatives (§15126.6(a) through (f)) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Draft EIR.

• “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” (§15126.6(b)).

• “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (§15126.6(e)). “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as 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. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (§15126.6(e)(2)).

• “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that require 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” (§15126.6(f)).

• “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, 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)” (§15126.6(f)(1)).

• For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (§15126.6(f)(2)(A)).

• “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (§15126.6(f)(3)).

Per the State CEQA Guidelines §15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the analysis: 1) describes the alternative; 2) analyzes the impact of the alternative as compared to the proposed project; 3) identifies the impacts of the project which would be avoided or lessened by the alternative; 4) assesses whether the alternative would meet most of the basic project objectives; and 5) evaluates the comparative merits of the alternative and the project.
7.1 PROJECT OBJECTIVES

As described in Section 3.5, PROJECT OBJECTIVES, the following objectives have been established for the proposed project and will aid decision makers in the review of the project and associated environmental impacts:

O1. Promote planned, orderly, and efficient patterns of rural residential development within central Shasta County on large lots, consistent with the existing neighborhood.

O2. Maximize positive fiscal contributions to County General Fund revenue.

O3. Identify, inventory, and conserve onsite natural resources through project design, avoidance, clustered development, designated building envelopes, and significant open space creation and protection.

O4. Create a planned community of appropriate density and scale that respects the existing topography and natural backdrop of the project site.

O5. Implement Shasta County General Plan provisions by developing a clustered rural residential development at densities allowed by the General Plan, on a site that is close to existing development.

O6. Develop rural residential uses at densities sufficient to support the construction of infrastructure, utilities, and services need to serve the site, including the formation of a Community Services District to oversee and manage the site’s natural resources.

O7. Complement the residential character of this portion of unincorporated Shasta County by devoting it to single-family residential uses.

O8. Ensure the vision for site development is economically feasible and does not impart undue strain on the current public facilities or services.

O9. Reduce fire hazards, and increase and improve fire safety for the project site and adjoining area.

O10. Provide complete avoidance of all jurisdictional waters of the United States and implement a management plan to manage these resources throughout the life of the project.

O11. Maximize open space for protection of sensitive natural resources, while providing a portion of the housing needs in Shasta County.

O12. Create a balance between development and the natural environment by minimizing disturbance of sensitive land forms and habitats.

O13. Provide pedestrian paths along the paved roadway as required by the County and allow for bridle paths for horses to travel in the subdivision.
O14. Provide significant onsite oak woodland preservation and implement an oak management strategy designed to maintain and enhance the onsite oak resource.

7.2 SIGNIFICANT ENVIRONMENTAL IMPACTS

This Draft EIR discloses that the proposed project would have the following significant and unavoidable environmental impacts:

- Agricultural Resources (cumulative)
- Air Quality (cumulative)
- Biological Resources (cumulative)
- Greenhouse Gases and Climate Change (project-level and cumulative)
- Traffic and Circulation (cumulative)

Per §15126.6 (b) of the State CEQA Guidelines, the discussion of alternatives shall focus on alternatives to a project (or its location) that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis, therefore, focuses on project alternatives that could avoid or substantially lessen environmental impacts of the proposed project related to the environmental categories listed above.

7.3 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the State CEQA Guidelines permits the elimination of an alternative from detailed consideration due to:

- Failure to meet most of the basic project objectives;
- Infeasibility; and
- Inability to avoid significant environmental impacts.

Section 15126(f)(1) of the State CEQA Guidelines states that “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...and whether the proponent can reasonably acquire control or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” In addition, the California Supreme Court has stated that lead agencies, not project opponents, have the burden to formulate alternatives for inclusion in an EIR.

Four potential alternatives to the proposed project that were initially considered but determined not to be viable and eliminated from further consideration are described below:

ALTERNATIVE PROJECT LOCATION

The key question and first step in the decision whether to include in the EIR an analysis of alternative sites is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant
impacts of the project need be considered for inclusion in the EIR (State CEQA Guidelines, §15126.6[f][2][A]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines, §15126.6[f][2][B]).

Alternative site evaluations are most relevant for projects carried out by public agencies and other entities that hold large tracts of land in multiple locations, where there is a choice in project placement. For example, a power plant or highway alignment may be located in different areas on public land, and achieve the same objectives. It should be noted that the planned residential use of the proposed project site would remain even if this project were to occur elsewhere.

The following alternative site considers that the land uses planned for the proposed project would be achieved elsewhere within the South-Central Region of unincorporated Shasta County, without development of the proposed project site. Table 7-1, ALTERNATIVE SITE, describes one site zoned Planned Development (PD) that could accommodate a single-family development, but at a much smaller scale than the proposed project.

<table>
<thead>
<tr>
<th>Property Description</th>
<th>Acres</th>
<th>General Plan Designation</th>
<th>Zoning</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Located in the Bella Vista area, generally located adjacent to and on the north side of State Route 299E, due north of the junction of State Route 299E and Deschutes Road</td>
<td>404</td>
<td>Rural Residential A (RA)</td>
<td>Planned Development (PD) Planned Development combined with the Restrictive Flood District (PD-F-2)</td>
<td>Planned development proposed in 1995 (Chaparral Lakes Estates Subdivision). 78 single-family lots ranging in size from 2 to 20 acres with a 24-acre remainder parcel and 20-acre parcel for a sewage treatment plant. Application expired.</td>
</tr>
</tbody>
</table>

Source: Shasta County, 2017.

If the above site were developed with a project similar to that of the proposed project, similar significant impacts on air quality, agricultural resources, biological resources and greenhouse gases would occur. Therefore, moving the proposed project to this site could potentially exacerbate these significant impacts or result in similar impacts and would not contribute to minimizing, reducing, or avoiding potentially significant impacts of the proposed project. In addition, alternative locations for this project are considered infeasible due to the absence of other similar land holdings in central Shasta County owned by the project applicant (State CEQA Guidelines §15126.6[f][1]). Lastly, this alternative site is not of sufficient size to meet most of the basic objectives of the proposed project. For these reasons, an offsite alternative was eliminated from further review.

“ANNEXATION TO COMMUNITY SERVICE AREA NO. 8” ALTERNATIVE

In 2011, the project applicant previously proposed a revised project concept on the proposed 715.4 project site evaluated in this EIR. Similar to the proposed project, the 2011 application requested approval to subdivide the property into 166 residential lots, along with separate parcels for open space uses. Figure 7-1, 2011 PROPOSED TENTATIVE MAP, provides an illustration of the proposed subdivision layout. At that time, the following actions were requested:
• **Zone Amendment.** A Zone Amendment to change the current zoning from Rural Residential 5-acre minimum (RR-BA-5), Rural Residential 3-acre minimum (RR-BA-3), and Unclassified (U), to a Planned Development (PD) zone district establishing a conceptual development plan covering the entire site.

• **Tract Map.** Approval of a tract map to divide the approximate 715.4-acre property into 166 residential parcels ranging from 1.38 acres to 7.86 acres in size, and four open space parcels totaling 174.66 acres.

• **Annexation to County Service Area (CSA) No. 8.** Annexation of the project site into CSA No. 8 for sewage and treatment disposal. The required annexation would be subject to separate application and approval from the Shasta County Local Agency Formation Commission (LAFCO).

The project applicant previously proposed the annexation of the entire 715.4-acre site into CSA No. 8 for sewage treatment and disposal. This required the construction of approximately 3.4-miles of new force main sewer line offsite within the Boyle Road and Deschutes Road rights-of-ways from the southern portion of the proposed project to an existing CSA No. 8 manhole located near the intersection of Old 44 Drive and Deschutes Road in Palo Cedro. The new sewer collection system would collect the sewage from the individual parcels and ultimately transmit it to a wet well and pump house located at the southern portion of the proposed project site. From the wet well and pump house, it would be sent by force main to a connection point within the existing gravity sewer line system in the north portion of CSA No. 8. It would then be transmitted through the existing infrastructure to the treatment facility and ponds at the CSA No. 8 treatment facility (refer to Figure 7-2, 2011 PROPOSED ANNEXATION BOUNDARY AND OFFSITE UTILITIES IMPROVEMENTS). The new sewer lines would be sized to meet the requirements of CSA No. 8 and LAFCO, and upon completion, would be dedicated to CSA No. 8, which would be responsible for ongoing operation and maintenance.

While this alternative would result in the same number of residential lots constructed onsite, this alternative would slightly increase the amount of permanent open space to 174.66 acres (approximately 19.7 acres more than the proposed project). However, this alternative did not include the formation of a CSD as proposed by the project. The proposed project’s CSD has been specifically developed to oversee and implement the plans and facilities which are a critical aspect of the proposed project and include the following: Tierra Robles Oak Woodland Management Plan; Tierra Robles Wildland Fuel/Vegetation Management Plan; Open Space Management; Resource Management Area management and oversight; Tierra Robles Design Guidelines; road maintenance; Storm Drain Maintenance; and Waste Water Collection, Treatment and Dispersal Facilities. Absent formation of a CSD similar to the proposed project, the same level of resource management and environmental stewardship would not be achieved under the “Annexation to Community Service Area No. 8” alternative.

Impacts related to aesthetics, agricultural resources, biological resources, cultural resources, greenhouse gases, noise, public services, and traffic would be generally the same as the proposed project, but greater for the topics of air quality (construction), offsite biological impacts (two creek crossings) as a result of the 3.4-miles of pipeline construction to CSA No. 8, and increased wastewater delivery and treatment at CSA No. 8’s treatment facility. In addition, this alternative fails to meet several Project Objectives that include the following:
<table>
<thead>
<tr>
<th>Land Use</th>
<th>Acres</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural Residential</td>
<td>92-199</td>
<td>42 residential lots</td>
</tr>
<tr>
<td></td>
<td>2.00-2.99</td>
<td>65 residential lots</td>
</tr>
<tr>
<td></td>
<td>3.00-3.99</td>
<td>24 residential lots</td>
</tr>
<tr>
<td></td>
<td>4.00-4.99</td>
<td>6 residential lots</td>
</tr>
<tr>
<td></td>
<td>5.00-4.99</td>
<td>6 residential lots</td>
</tr>
<tr>
<td></td>
<td>6.00+</td>
<td>66 residential lots</td>
</tr>
<tr>
<td></td>
<td>530</td>
<td>6 roadway segments</td>
</tr>
<tr>
<td></td>
<td>63.73</td>
<td>2 crossings of Clough Creek</td>
</tr>
<tr>
<td>Roadway Rights-of-Way Bridges</td>
<td>60.4 acres</td>
<td>10 open space lot - east</td>
</tr>
<tr>
<td></td>
<td>7.06</td>
<td>10 open space lot - north west</td>
</tr>
<tr>
<td></td>
<td>9.66</td>
<td>10 open space lot - south</td>
</tr>
<tr>
<td></td>
<td>2.62</td>
<td>10 open space lot - north center</td>
</tr>
<tr>
<td>Total Proposed Project</td>
<td>75.4 acres</td>
<td></td>
</tr>
</tbody>
</table>

Figure 7-2
2011 Proposed Annexation Boundary and Off-Site Utilities Improvements

SOURCE: Shasta County GIS 2012 (roads, parcels, streams, lakes).
O6. Develop rural residential uses at densities sufficient to support the construction of infrastructure, utilities, and services need to serve the site, including the formation of a Community Services District to oversee and manage the site’s natural resources.

O8. Ensure the vision for site development is economically feasible and does not impart undue strain on the current public facilities or services.

O10. Provide complete avoidance of all jurisdictional waters of the United States and implement a management plan to manage these resources throughout the life of the project.

Therefore, the “Annexation to Community Service Area No. 8” alternative is environmentally inferior to the proposed project and is not discussed further in this EIR.

SITE DEVELOPMENT ALTERNATIVES

During the February 2016 Notice of Preparation (NOP) several public comments were received suggesting that the proposed project be revised to include parcels sizes ranging between 3 and 10 acres. The following discussion describes three development scenarios that were considered for the 715.4-acre project site.

“Development in Accordance with Existing General Plan Land Use and Zoning Classifications” Alternative

The current Shasta County General Plan land use designation for the entire proposed project site is Rural Residential A (RA), which allows a maximum density of one dwelling unit per two acres. Approximately 64.4 acres of the (RA) designation within the proposed project site has greater than 30 percent slopes. The General Plan does not specifically restrict development in areas with slopes greater than 30 percent; however, page 7.1.012 of the Shasta County General Plan states that these areas be considered in performing the land capability analysis of a project site due to concerns regarding erosion potential and slope stability, as well as extreme or high wildland fire safety concerns. In calculating the overall allowable density of the project site, Shasta County General Plan Policy CO-j, states that in areas designated RA, lands in excess of 30 percent slope may be either developed at 1 dwelling unit per 10 acres or an equivalent density credit may be additionally applied to the land that is less than 30 percent slopes.

California Government Code §6586021 requires zoning to be consistent with the general plan. Consistency with the general plan is possible only if the local government, in this case Shasta County, has officially adopted a general plan. The land uses authorized in the Shasta County Zoning Plan must be compatible with the objectives, policies, general land uses, and programs specified in the Shasta County General Plan.

Currently the Shasta County Zoning Plan identifies APNs 061-240-001 and 061-210-001 as Rural Residential (R-R), with a minimum lot area of three to five acres (R-R-BA-3 and R-R-BA-5). Existing zoning on APNs 078-250-002, 078-060-036 and 078-060-039 is Unclassified (U), which is intended to be applied as a holding district until a principal zone district has been determined. As such, for the purpose of this alternative, a certain degree of forecasting is necessary to reasonably apply a zone district to the Unclassified (U) acreage to create consistency between the Shasta County General Plan land use designation and zoning. Similar to the proposed project, any future development within this Unclassified (U) zone district could request similar zoning and densities, more aggressive higher densities, or less densities. For the purpose of analyzing this alternative, the following land use and zoning would apply based on a review of surrounding zoning and land use patterns.
This alternative would not include the Planned Development (PD) as it would result in the development of the site in accordance with current land use designations and the base zoning districts noted in Table 7-2, above. In addition, a more traditional grid-like development pattern and circulation system, similar to the surrounding area, is assumed under this alternative. As such, this alternative avoids the flexibility in design established by the Planned Development (PD) resulting in a less efficient use of land and subdivision design, eliminates 192.7 acres of open space preserve, and would likely not maximize the avoidance objectives of sensitive habitats including wetlands and waters of the U.S. Implementation of this alternative would increase the development intensity of the 715.4-acre project site from 166 units to 188 units; an additional 22 dwelling units compared to the proposed project; therefore, the development intensity and subsequent environmental impacts in all environmental categories would greater than those identified for the proposed project. It should also be noted that although every approved residential lot would be entitled to a secondary dwelling unit (e.g., accessory dwelling unit) pursuant to Government Code Section 65852.2, it is assumed that approximately 9 percent of residential lots would have secondary units resulting in approximately 17 secondary units being developed under this alternative. Specifically, this alternative would exacerbate the significant and unavoidable impacts of the proposed project in the categories of agricultural resources (cumulative), air quality (cumulative), biological resources (cumulative), greenhouse gases (project-level and cumulative), and traffic and circulation (cumulative).

Although implementation of the “Development in Accordance Existing General Plan Land Use and Zoning Classifications” alternative would be consistent with the existing General Plan land use designations for the project site, this alternative would only achieve Project Objective O6., above. All other project objectives would not be satisfied under this alternative. Therefore, given the speculative nature of this alternative, the increased environmental impacts that would result, and the inability of the alternative to meet most of the Project Objectives noted in Section 7.1, above, the “Development in Accordance with Existing General Plan Land Use and Zoning Classifications” alternative is considered environmentally inferior to the proposed project and is not discussed further in this EIR.
“Clustered 3-Acre Parcels” Alternative

As described in Section 3.0, PROJECT DESCRIPTION, and highlighted in several Project Objectives noted above, the project applicant has focused the design of the proposed project to preserve approximately 74.2 percent of the 715.4-acre site. This has been accomplished through careful site design, respecting the natural environment, sensitive environmental resources, and topographic conditions. To this end, building sites have been sensitively placed in consideration of existing topography and site features, with vegetation emphasized over the built environment to screen homes and provide a sense of community through a coordinated landscape program.

As currently proposed, the proposed project and backbone infrastructure avoids impacts to wetlands and waters of the U.S. Under the “Clustered 3-Acre Parcels” alternative, the 166 single-family units proposed by the project would be developed consistent with the Shasta County General Plan land use designations for the site. This alternative would require a zone change from Unclassified (U), Rural Residential 3-Acre Minimum (RR-BA-3), and Rural Residential 5-Acre Minimum (RR-BA-5) to Planned Development (PD) on the 715.4-acre project site to allow development of the 166 single-family units. Similar to the proposed project it is assumed that approximately 9 percent of lots would have secondary units resulting in approximately 15 accessory dwelling units being developed under this alternative.

Under this scenario, 166 three-acre residential parcels would be created and clustered similar to the proposed project. As a result, the subdivision footprint (i.e., residential parcel area) would increase from 471.92 acres under the proposed project to approximately 498 acres, an overall increase to the subdivision footprint of 26.08 acres. Backbone infrastructure, including the internal roadway network which has been designed to avoid onsite jurisdictional drainages and wetlands, would potentially be redesigned to accommodate the larger subdivision footprint, potentially encroaching into sensitive environmental habitats. Although larger Resource Management Areas would be created under this alternative, site development would likely encroach within 30 percent slope areas, necessitating additional grading, fire fuel modifications, habitat loss, and potential impacts to federally protected species (i.e., elderberry bushes). In addition, the larger open space areas proposed for onsite conservation would likely be reduced to accommodate the additional 26.08 development acres. This alternative would result in greater construction-related impacts related to air quality (increased grading) and overall greater impacts to onsite oak woodlands and Grazing Land as the amount of preservation achieved through permanent open space dedication would be less when compared to that of the proposed project. In addition, this alternative does not fully meet several key Project Objectives, including the following:

O3. Identify, inventory, and conserve onsite natural resources through project design, avoidance, clustered development, designated building envelopes, and significant open space creation and protection.

O4. Create a planned community of appropriate density and scale that respects the existing topography and natural backdrop of the project site.

O10. Provide complete avoidance of all jurisdictional waters of the United States and implement a management plan to manage these resources throughout the life of the project.

O11. Maximize open space for protection of sensitive natural resources, while providing a portion of the housing needs in Shasta County.
O12. Create a balance between development and the natural environment by minimizing disturbance of sensitive land forms and habitats.

Subsequent environmental impacts in all environmental categories would greater than those identified for the proposed project. As a result, the “Clustered 3-Acre Parcels” alternative is considered environmentally inferior to the proposed project and is not discussed further in this EIR.

WASTEWATER DISPERSAL ALTERNATIVE

As currently proposed and described in Section 3.0, PROJECT DESCRIPTION, wastewater generated from individual lots would be initially collected via individual residential septic tanks, transferred to a community collection system, treated, and then recycled for landscape irrigation. The drip zones would be located in street medians and the effluent would provide nominal irrigation to appropriate native plants. The treatment system would be designed to meet the reuse requirements for discharge of the Title 22 Disinfected Secondary Effluent as well as the Central Valley RWQCB’s Waste Discharge Requirements.

An alternative wastewater storage and dispersal approach to the proposed decentralized system was evaluated. This alternative included three, 2.37-acre onsite storage ponds located east of the proposed extension of Chatham Ranch Road to Seven Lakes Road and significant spray fields for treated effluent surface application. Based on the Regional Water Quality Control Board’s (RWQCB) surface application requirements of 0.1 gallons per day per square foot, approximately 32.5 acres of spray field would be required. Preliminary designs placed the spray irrigation infrastructure along 30 percent slope areas within the 154.9-acre eastern open space parcel. Although the layout of the spray fields was designed to avoid wetland and waters of the U.S., it was determined by the project applicant that more environmentally sound dispersal options were available which would allow this significant parcel to be retained as dedicated permanent open space (refer to Figure 7-3, WASTEWATER DISPERSAL ALTERNATIVE). As a result, this alternative is not discussed further in this EIR.

7.4 PROJECT ALTERNATIVES

Alternatives that would avoid or substantially lessen any of the significant effects of the project and that would feasibly attain most of the basic project objectives are analyzed below. Each alternative is discussed with respect to its relationship to the proposed project and the Project Objectives. In addition, impacts associated with each alternative, as they relate to the impacts associated with the proposed project are also provided in the below analysis. The alternatives analyzed individually include the following:

- “No Project” Alternative
- “No Project / Development in Accordance with Existing Zoning” Alternative
- “Non-Clustered Large Lot” Alternative
- “Reduced Density” (25% Reduction) Alternative
Specifically, as discussed above, per the State CEQA Guidelines §15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the below analysis describes the alternative, analyzes the impacts of the alternative as compared to the proposed project, identifies significant impacts of the proposed project that would be avoided or lessoned by the alternative, assesses the alternative’s ability to meet most of the Project Objectives, and evaluates the comparative merits of the alternative and the proposed project (provided in Section 7.5, ENVIRONMENTALLY SUPERIOR ALTERNATIVE).

“NO PROJECT” ALTERNATIVE

Description of Alternative

Consistent with State CEQA Guidelines §15126.6, the “No Project” alternative assumes that the existing land uses and condition of the project site at the time the NOP was published (February 2016) would continue to exist without changes. The setting of the proposed project site at the time the NOP was published is described as part of the existing conditions throughout Section 5.0, DESCRIPTION OF ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES, of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project.

The “No Project” alternative assumes the proposed project would not be implemented and land uses and other improvements would not be constructed. The existing project site would remain unaltered and in its current condition. All infrastructure improvements including water, wastewater, drainage, and circulation facilities identified in the proposed project would not be constructed. Because the project site would remain unchanged, few or no environmental impacts would occur. This alternative serves as the baseline against which to evaluate the effects of the proposed project and other project alternatives.

It should be noted that the “No Project” alternative does not preclude development of the site in the future for single-family residential development. It is assumed that the population of Shasta County will continue to grow at its current rate of less than two percent annually over the next 20 years, with increments generated both by a continuing influx of new residents from outside the County and by the natural increase of the population in the area. As a result, the entire 715.4-acre site would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan, and such future development may also result in impacts.

Impacts Compared to Project Impacts

An evaluation of the potential environmental impacts of the “No Project” alternative, as compared to those of the proposed project, is provided below.

Aesthetics

Under the “No Project” alternative, the onsite topography, vegetation, and offsite view corridors would not be modified from their existing state. Visual impacts from the offsite, as well as the change in character/quality from the residents to the west (i.e., vegetation removal and grading) would be eliminated. Also, resultant light and glare impacts associated with the proposed project would be avoided under this alternative. Therefore, under this alternative, impacts regarding aesthetics, light, and glare would be eliminated compared to the proposed project.
Agricultural Resources

Under this alternative, the proposed project site would not convert 533.27 acres that are designated by the FMMP as Grazing Land into single-family residential lots and associated infrastructure improvements. This alternative would not result in significant and unavoidable impacts to agricultural resources. As a result, impacts to agricultural resources are less compared to the proposed project.

Air Quality

Under this alternative, short-term construction and long-term operational air emissions would not occur as no project construction would take place, no project operations would be established, and no project-related traffic or stationary source emissions would be generated by the new facility. Although the proposed project as mitigated would not result in significant emissions of air quality pollutants, the air quality impacts associated with the “No Project” alternative would be less than the proposed project.

Biological Resources

Under the “No Project” alternative the site would not be developed with a combined church and school facility, avoiding potential impacts to biological resources, including special-status species and sensitive habitats. In addition, implementation of the “No Project” alternative would avoid the 446.6 acres of impacts to oak woodland habitat, as no construction activities would occur. Direct impacts to biological resources that would result from the proposed project would not occur under the “No Project” alternative; therefore, impacts to biological resources would be less than the proposed project.

Cultural Resources

Under the “No Project” alternative, no impacts would occur with respect to existing and/or undiscovered cultural resources due to the construction of the proposed project and supporting infrastructure; however, even in the undisturbed state, cultural resource sites will remain vulnerable to human disturbance or destruction. In addition, it is possible that cultural resources sites may also be altered over time due to weather conditions. If these sites are not fully documented, information from these sites could be lost. The potential for direct impacts to cultural resources associated with the “No Project” alternative is less than the proposed project.

Geology and Soils

Because no development would occur under this alternative, soil disturbance associated with grading and building activities would not occur. No new buildings, roads, utilities, or other infrastructure would be constructed on the project site, thus, there would be no impacts associated with landslides, soil stability, or slopes similar to that of the proposed project. Compared to the proposed project, geology and soil impacts would be eliminated under this alternative.

Greenhouse Gases and Climate Change

This alternative would result in no greenhouse gas (GHG) emission generation because of the site would remain in an undeveloped condition. As a result, GHG emission generation would be less than that of the proposed project.
Hazards and Hazardous Materials

Under the “No Project” alternative, the existing environmental conditions, including those that may be defined as either adverse or significant, would continue to prevail. Under this alternative, public health and safety impacts related to project construction and operations would also not occur. Wildland fire hazards would remain as they currently exist on the proposed project site. This alternative would not introduce new people or structures to the Very High Fire Hazard Severity Zone (VHFHSZ). Potential impacts regarding hazards and hazardous materials would be less than those of the proposed project.

Hydrology and Water Quality

The “No Project” alternative would avoid potential short-term and long-term impacts to water quality associated with grading and construction activities, as no site development would occur. Potential impacts to downstream and other waters would be less than those impacts identified under the proposed project.

Land Use and Planning

The “No Project” alternative would have no impacts to land use as the land would remain in its current state; therefore, the existing Shasta County General Plan designation - Rural Residential A (RA) (1 dwelling unit / 2 acres) would remain over the entire site. The existing Shasta County Zoning Plan identifies APNs 061-240-001 and 061-210-001 as Rural Residential (R-R), with a minimum lot area of three to five acres (R-R-BA-3 and R-R-BA-5). Existing zoning on APNs 078-250-002, 078-060-036 and 078-060-039 is Unclassified (U), which is intended to be applied as a holding district until a principal zone district has been determined. Under this alternative, the existing zoning would remain; however, this alternative would not preclude the property from being developed in the future. If the proposed project is not implemented, the project site would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan, and said development may also result in impacts.

Noise

With no residential development occurring onsite, no new noise would be generated by construction, operations, or traffic generated by residents. Noise-sensitive land uses in the vicinity of the project site would not experience any change in noise levels. Therefore, short-term and long-term noise impacts would be less when compared to that of the proposed project.

Population and Housing

Under this alternative, the project site would not be developed and there would be no increase in population that could result in the displacement or replacement of housing or people. Impacts to population and housing would be less compared to the proposed project. However, it is assumed that the population of Shasta County will continue to grow at its current rate of less than two percent annually over the next 20 years, with increments generated both by a continuing influx of new residents from outside the County and by the natural increase of the population in the area. As discussed in Section 5.12, POPULATION AND HOUSING, total employment in the County is expected to increase approximately 14.7 by 2024, with an increase in employment of 9,900 jobs.
Public Services and Fiscal Impacts

Under the “No Project” alternative, the existing conditions, including those that may not meet current standards or are not adequate to serve existing conditions, would continue to prevail. This alternative would not develop the project site, therefore, there would not be an increased demand for public services including fire protection and emergency medical services, law enforcement, schools, and other general governmental services. Because no development would occur, there would be no need for additional services to be provided. Potential impacts would be less than those impacts identified under the proposed project.

Recreation

Similar to the proposed project, the “No Project” alternative would not result in an increased use of any area recreational facilities, and would therefore not require construction of new or expansion of any other existing recreational facilities. Compared to the proposed project, recreation impacts would be eliminated under this alternative.

Traffic and Circulation

This alternative would not result in direct changes to average daily vehicle trips (ADT) as no development is proposed. This alternative would not result in impacts on the intersections and roadway segments surrounding the proposed project some of which need improvements, particularly by year 2035. Furthermore, no change in circulation patterns would occur, as there would be no development to create the need for changes in circulation patterns. Overall, the “No Project” alternative would result in less impacts to traffic and circulation compared to the proposed project, since no traffic would be generated. The following discusses the forecast Year 2035 No Project study intersection traffic conditions under the “No Project” alternative. The following intersections are projected to operate unacceptably under Year 2035 No Project conditions and are evaluated in greater detail in Section 5.16, TRAFFIC AND CIRCULATION:

- Old Alturas Road & Old Oregon Trail (Intersection #8)
- Airport Road & SR-44 WB Ramps (Intersection #10)
- Boyle Road & Deschutes Road (Intersection #13)
- Deschutes Road & Old 44 Drive (Intersection #14)
- Deschutes Road & SR-44 WB Ramps (Intersection #16)

Even with the above intersections operating at unacceptable levels, the “No Project” alternative would be less than those impacts identified under the proposed project.

Tribal Cultural Resources

No Tribal Cultural Resources (TCRs) were identified within or immediately adjacent to the project area. The “No Project” alternative would result in no earthmoving activities; therefore, similar to the proposed project, no impacts to TCRs would occur.
Utilities and Service Systems

Under the “No Project” alternative, the existing conditions onsite would continue to prevail. This alternative would not develop the proposed project site, therefore, there would not be an increased demand for utility and service systems including wet (water/sewer) and dry (electrical, gas, telephone) utilities. Because no development would occur, there would be no need for additional services to be provided. Impacts to public services and utilities are less compared to the proposed project.

Conclusion

Avoid or Substantially Lessen Project Impacts

The “No Project” alternative would eliminate or reduce all impacts associated with the environmental categories discussed.

Attainment of Project Objectives

The “No Project” alternative fails to meet all of the stated objectives for the proposed project as described in Section 7.1, PROJECT OBJECTIVES.

Comparative Merits

Under the “No Project” alternative, no physical changes would occur on the project site, and there would not be a potential for new environmental impacts to occur. The “No Project” alternative would mean that the property owner would not develop the proposed project at this time; however, it would not preclude development at a future date. The “No Project” alternative, is considered overall environmentally superior to the proposed project, as it would significantly reduce or eliminate the majority of short-term, long-term, and cumulative impacts in all categories when compared to the proposed project.

“NO PROJECT / DEVELOPMENT IN ACCORDANCE WITH EXISTING ZONING” ALTERNATIVE

Description of the Alternative

Under the “No Project / Development in Accordance with Existing Zoning” alternative, the 715.4-acre site would be developed as allowed under the zoning for the property. As previously described above, the Shasta County Zoning Plan identifies APNs 061-240-001 and 061-210-001 as Rural Residential (R-R), with a minimum lot area of three to five acres (R-R-BA-3 and R-R-BA-5). Existing zoning on APNs 078-250-002, 078-060-036 and 078-060-039 is Unclassified (U), which is intended to be applied as a holding district until a principal zone district has been determined. For the purpose of this alternative, it is assumed that APN 061-210-001 (74.4 acres) would be developed consistent with R-R-BA-3 and APN 061-240-001 (315.4 acres) would be developed consistent with R-R-BA-5, for a total single-family unit yield of 80 residential lots as noted below in Table 7-3.
Under this alternative, the 80 residential lots would generally be located on the eastern project site within the 154.9-acre open space preservation areas proposed by the project. The remaining 325.6 acres designated as Unclassified (U) would remain; however, this alternative would not preclude rezoning and ultimate development within these Unclassified (U) parcels at a later date. As a result, the 325.6 acres of Unclassified (U) would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan, and said development may also result in impacts.

This alternative would not include the Planned Development (PD) as it would result in the development of the site in accordance with current land use designations. As such this alternative avoids the flexibility in design established by the Planned Development (PD) resulting in a less efficient use of land and subdivision design. Under this alternative, the total number of single-family dwelling units anticipated is assumed to be reduced from 166 to 80 representing a reduction of 86 units, or approximately 51 percent.

Similar to the proposed project, although every approved residential lot would be entitled to an accessory dwelling unit pursuant to Government Code Section 65852.2, it is assumed that approximately 9 percent of lots would have secondary units. Therefore, for purposes of this environmental analysis, it is assumed that 7 accessory dwelling units would be developed under the “No Project / Development in Accordance with Existing Zoning” alternative.

Single-family residences and secondary units would have the same square footage for development as under the proposed project. It is assumed that typical single-family residences would be up to 3,550 square feet in area and that secondary units would be up to 1,200 square feet. Based on County-wide averages, each primary single-family dwelling would have 2.5 residents, and each accessory dwelling unit would have 2 residents.
Impacts Compared to Project Impacts

An evaluation of the potential environmental impacts of the “No Project / Development in Accordance with Existing Zoning” alternative, as compared to those of the proposed project, is provided below.

Aesthetics

With the “No Project / Development in Accordance with Existing Zoning” alternative, development of 80 single-family residential units would occur on APNs 061-240-001 and 061-210-001 as permitted by the Shasta County General Plan and subject to applicable design regulations. Due to existing regulations, impacts on APNs 061-240-001 and 061-210-001 as a result of this alternative would be similar to the proposed project although slightly lower due as a result of the reduced unit yield.

No open space areas would be created under this alternative other than the 325.6 acres of temporarily Unclassified (U) zoned land associated with APNs 078-060-36, 078-060-39, and 078-250-002, which as noted above, could be developed in the future. Any proposed future development within this Unclassified (U) zone district could request similar zoning and densities, more aggressive higher densities, or less densities. As a result, the overall aesthetic impact associated with this alternative is assumed to be greater than that of the proposed project over the long-term as no long-term open space preservations areas similar to the magnitude created by the proposed project would result.

Agricultural Resources

This alternative assumes the conversion of 389.8 acres designated by the Farmland Mapping and Monitoring Program (FMMP) as Grazing Land into single-family residential lots on APNs 061-240-001 and 061-210-001. Compared to the proposed project Grazing Land impact of 533.27 acres, this alternative would result in an approximate 143.47-acre reduction in impact acreage to onsite Grazing Land resources. Although this alternative would also be required to comply with MM 5.2-1, as described in Section 5.2, AGRICULTURAL RESOURCES, this alternative and the proposed project would result in significant and unavoidable cumulative impacts to agriculture resources as a result of converting Grazing Land to urban uses. Direct impacts to agriculture resources under this alternative are less when compared to the proposed project, but remain cumulatively significant and unavoidable.

No Zone Amendment would be necessary under this alternative and therefore would not include the Planned Development (PD). As such this alternative avoids the flexibility in design established by the Planned Development (PD) resulting in a less efficient use of land and subdivision design when compared to that of the proposed project. It should be noted that the 325.6 acres of Unclassified (U) land would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan. This alternative would not eliminate the potential for future impacts to occur on this 325.6 acres. Similar to the proposed project, any future development within this Unclassified (U) zone district could request similar zoning and densities, more aggressive higher densities, or less densities. Under this alternative, the efficient and orderly integration planning of future land uses would not be achieved to the degree of the proposed project, therefore, would result in greater potential impacts to agricultural resources when compared to the proposed project.
Air Quality

As shown in Table 5.3-7, MITIGATED CONSTRUCTION-RELATED EMISSIONS, the proposed project’s mitigated short-term construction emissions would be below the Shasta County Air Quality Management District’s (SCAQMD’s) applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the “No Project / Development in Accordance with Existing Zoning” alternative. Comparatively, the construction-related air quality impacts would be proportionally reduced when compared to the proposed project, as the ground-disturbing activities would occur over a reduced area. This alternative would also be required to comply with MM 5.3-1, as described in Section 5.3, AIR QUALITY, to reduce short-term construction air emissions to a less than significant level. Short-term air quality impacts would be less compared to the proposed project.

As indicated in Table 5.3-8, LONG-TERM OPERATIONAL EMISSIONS, the proposed project would exceed the SCAQMD’s Level A and Level B operational thresholds for ROG, and Level A thresholds for NOx. As shown, implementation of MM 5.3-2 would reduce ROG levels to below the Level B significance threshold. In order to address NOx emissions, feasible Standard Mitigation Measures (SMM) would be implemented per SCAQMD guidance as required by MM 5.3-3. Comparatively, the operational air quality impacts under this alternative would be proportionally reduced when compared to the proposed project, as 80 single-family units would be constructed on APNs 061-240-001 and 061-210-001. Based on fewer residential units, it is assumed that fewer vehicle trips would result in less operational emissions. Impacts to air quality are less compared to the proposed project. This alternative would also be required to comply with MM 5.3-2 and MM 5.3-3, as described in Section 5.3, AIR QUALITY, to reduce long-term air emissions to a less than significant level.

Overall, the “No Project / Development in Accordance with Existing Zoning” alternative would create fewer impacts with regard to air quality emissions, as a decrease in daily vehicle trips (890 daily vehicle trips) would result in less air quality emissions when compared to the proposed project.

Biological Resources

The “No Project / Development in Accordance with Existing Zoning” alternative would result in a similar conversion of annual grassland and oak woodlands on APNs 061-240-001 and 061-210-001, although reduced when compared to the proposed project. Although this alternative would also be required to comply with MM 5.4-1a through MM 5.4-1k, as described in Section 5.4, BIOLOGICAL RESOURCES, this alternative and the proposed project would result in significant and unavoidable cumulative impacts to biological resources as a result of converting of oak woodlands to urban uses. Direct impacts to biological resources under this alternative are less when compared to the proposed project, but remain cumulatively significant and unavoidable.

As previously described above under Agricultural Resources, the “No Project / Development in Accordance with Existing Zoning” alternative does not include a zone amendment and therefore would not include the Planned Development (PD). As such this alternative avoids the flexibility in design established by the Planned Development (PD) resulting in a less efficient use of land and subdivision design when compared to that of the proposed project. It should be noted that the 325.6 acres of Unclassified (U) land would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan. This alternative would not eliminate the potential for future impacts to occur on this 325.6
acres. Similar to the proposed project, any future development within this Unclassified (U) zone district could request similar zoning and densities, more aggressive higher densities, or less densities. Under this alternative, the efficient and orderly integration planning of future land uses would not be achieved to the degree of the proposed project, therefore, would result in greater potential impacts to biological resources when compared to the proposed project.

**Cultural Resources**

The “No Project / Development in Accordance with Existing Zoning” alternative would result in the development of 389.8 acres on APNs 061-240-001 and 061-210-001, yielding 80 single-family residential units. Although, the anticipated ground disturbance would be less than that of the proposed project, potential impacts to cultural and paleontological resources would be similar to the proposed project. As a result, similar cultural resource mitigation measures (refer to MM 5.5-1a and MM 5.5-1b in Section 5.5, CULTURAL RESOURCES) identified for the proposed project would be required to be implemented under the “No Project / Development in Accordance with Existing Zoning” alternative.

**Geology and Soils**

The “No Project / Development in Accordance with Existing Zoning” alternative would develop 389.8 acres of the overall 715.4-acre site, approximately 82.18 acres less than the 471.92-acre development footprint of the proposed project. Thus, impacts associated with earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and landslides would be similar when compared to the proposed project. Impacts would continue to be less than significant under the “No Project / Development in Accordance with Existing Zoning” alternative.

**Greenhouse Gases and Climate Change**

GHG emissions from construction and operational activities would also occur with the “No Project / Development in Accordance with Existing Zoning” alternative, although to a lesser extent (an approximately 51 percent decrease in daily vehicle trips) compared to the proposed project. The “No Project / Development in Accordance with Existing Zoning” alternative would generate a proportional 51 percent decrease in GHG mitigated emissions compared to the proposed project, resulting in approximately 1,840.40 MTCO₂e/yr.

**Hazards and Hazardous Materials**

Under the “No Project / Development in Accordance with Existing Zoning” alternative, the impacts related to construction activities associated with hazards and hazardous materials would be similar to the proposed project because the development is similar and construction equipment needed would be similar. Development would result in a smaller population using the proposed project site; however, the land use would be residential under this alternative. Thus, this alternative would have similar negative impacts (introduction of new people and structures to a VHFHSZ and increased residential activities that could be potential fire sources such as outdoor BBQs and backyard fire-pits) as compared to the proposed project with respect to interfering with an adopted emergency response plan or emergency evacuation plan, exposure to wildland fires, and the use of hazardous substances. Similar mitigation identified for the proposed project would be required to be implemented under the “No Project / Development in Accordance with Existing Zoning” alternative.
Hydrology and Water Quality

The “No Project / Development in Accordance with Existing Zoning” alternative would develop 389.8 acres of the overall 715.4-acre site, approximately 82.18 acres less than the 471.92-acre development footprint of the proposed project. Therefore, the area to be developed footprint would be slightly less that of the proposed project. Grading and infrastructure would still be required under this alternative, therefore, impacts related to surface hydrology would be similar to the proposed project. Similarly, with respect to water quality, this alternative would also the design and construction of site facilities shall comply with the statewide General Permit (Water Quality Order No. R5-2016-0040) and would be subject to the requirements of Shasta County Code, Chapter 12.12 related to grading. Compliance with the statewide General Permit and Shasta County Code, Chapter 12.12 of would serve to ensure that short-term surface water quality impacts regarding water quality (non-point source pollutants) would be less than significant under the “No Project / Development in Accordance with Existing Zoning” alternative.

Land Use and Planning

Under the “No Project / Development in Accordance with Existing Zoning” alternative, the 715.4-acre site would be developed as allowed under the zoning for the property. For the purpose of this alternative, it is assumed that APN 061-210-001 (74.4 acres) would be developed consistent with R-R-BA-3 and APN 061-240-001 (315.4 acres) would be developed consistent with R-R-BA-5, for a total single-family unit yield of 80 residential lots. The 80 residential lots would generally be located on the eastern project site within the 154.9-acre open space preservation areas proposed by the project. The remaining 325.6 acres designated as Unclassified (U) would remain; however, this alternative would not preclude rezoning and ultimate development within these Unclassified (U) parcels at a later date.

This alternative would not include the Planned Development (PD) as it would result in the development of the site in accordance with current land use designations. As such, this alternative avoids the flexibility in design established by the Planned Development (PD) resulting in a less efficient use of land and subdivision design when compared to that of the proposed project. Under this alternative, the total number of residential dwelling units anticipated is assumed to be reduced from 166 to 80 representing a reduction of 86 units, or approximately 51 percent. As previous described above, it is assumed 9 percent, or 7 residential lots would have accessory dwelling units. No Zone Amendment would be necessary under this alternative. However, it should be noted that the 325.6 acres of Unclassified (U) land would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan, and said development may also result in impacts. Similar to the proposed project, any future development within this Unclassified (U) zone district could request similar zoning and densities, more aggressive higher densities, or less densities. Under this alternative, the efficient and orderly integration planning of future land uses would not be achieved to the degree of the proposed project, therefore, would result in greater impacts to land use when compared to the proposed project.

Noise

Construction noise associated with the proposed project would result in similar impacts with mitigation incorporated, to surrounding sensitive receptors. Noise levels would then be less than established standards. Construction activities would cause less significant increased mobile noise along access routes.
The "No Project / Development in Accordance with Existing Zoning" alternative's construction-related vibration impacts would also be similar to the proposed project and would be less than significant. Short-term noise impacts from grading and construction activities would occur with the "No Project / Development in Accordance with Existing Zoning" alternative due to construction of the residential structures and improvements. Comparatively, this alternative's construction-related noise impacts would be less as compared to the proposed project, given this alternative would result in a smaller 80 single-family unit development. Therefore, the less than significant short-term and long-term operation noise impacts that would occur with the proposed project would occur also with the "No Project / Development in Accordance with Existing Zoning" alternative. Overall, the "No Project / Development in Accordance with Existing Zoning" alternative would create impacts that are similar, but reduced, when compared to the proposed project.

**Population and Housing**

Under the "No Project / Development in Accordance with Existing Zoning" alternative, up to 80 single-family residential units can be assumed for the site. The California Department of Finance County population and housing estimates for 2016 show that the Shasta County has 2.5 persons per household (DOF, 2016). Single-family residences and secondary units would have the same square footage for development as under the proposed project. It is assumed that typical single-family residences would be up to 3,550 square feet in area and that secondary units would be up to 1,200 square feet. Based on County-wide averages, each primary single-family dwelling would have 2.5 residents, and each secondary unit would have 2 residents. Because this alternative would provide new single-family residential units, it would directly increase the County's population by approximately 230 people.

This increase is less (approximately 215 persons) than the 445 population increase projected for the proposed project. Although, increases to population as a result of the "Development in Accordance with Existing Zoning" alternative would be slightly less than the proposed project because this alternative would provide housing for the increase in population, in accordance with the County's planned population and housing increases as set forth in the Shasta County General Plan. This alternative would not result in displacement of houses or population. Population and housing impacts under the "No Project / Development in Accordance with Existing Zoning" alternative would be less than significant and less than under the proposed project.

**Public Services and Fiscal Impacts**

This alternative would result in the construction of approximately 80 single-family residential units and would increase the population by approximately 230 people. The increase of 230 residents would represent less than one percent increase in population for the County, a smaller population increase than anticipated by the proposed project. This would result in a proportional reduction in all public service needs.

With respect to schools, this alternative would result in a smaller increase in public school student population as compared to the proposed project where the additional residents would generate an additional 40 school children. This alternative would result in reduced school fees (currently $3.36 per square foot for residential construction; however, these fees are reassessed in July of each year). As

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1 The Department of Finance provides the persons per household for cities and counties. These numbers do not differentiate between the types of housing (i.e., single family residential vs. multi-family residential).
discussed in Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, the schools serving the project site have been experiencing declining enrollment.

With respect to parks and recreation, this alternative would result in a decreased need for additional park and recreation services. This alternative would increase the population by up to approximately 230 people. The alternative would result in a reduced impact as compared to the proposed project.

Similar to fire and law enforcement services, schools, and parks, this alternative would result in reduced impacts to library, roadway maintenance, and transit services as compared to the proposed project. Therefore, overall, the “No Project / Development in Accordance with Existing Zoning” alternative impacts on public services would be less than the proposed project.

Recreation

The “No Project / Development in Accordance with Existing Zoning” alternative would be anticipated to increase the population by approximately 445 people. There are several National and State parkland facilities, national forests, and Bureau of Land Management holdings within the region available to potential park users. The use of existing parks and recreational facilities would be less when compared to the proposed project. This alternative would not result in the 192.7 acres of permanent open space preservation that could be utilized by subdivision and neighborhood residents. This is viewed as a long-term negative impact of this alternative when compared to the proposed project.

Traffic and Circulation

The “No Project / Development in Accordance with Existing Zoning” alternative would generate residential traffic associated with employment, school, public services, shopping, etc. vehicle trips. This alternative would result in approximately 853 daily vehicle trips. Given this decrease in trip generation, and that fewer trips would occur during the AM and PM peak periods as compared to the proposed project, this alternative would have less traffic and circulation impacts as compared to those of the proposed project.

Tribal Cultural Resources

The “No Project / Development in Accordance with Existing Zoning” alternative would develop 389.8 acres of the overall 715.4-acre site, approximately 82.18 acres less than the 471.92-acre development footprint of the proposed project). Although, the anticipated ground disturbance would be less than that of the proposed project, potential impacts to Tribal Cultural Resources would be similar to the proposed project. As a result, similar mitigation measures for Tribal Cultural Resources identified for the proposed project would be required to be implemented under the “No Project / Development in Accordance with Existing Zoning” alternative. Impacts would continue to be less than significant under the “No Project / Development in Accordance with Existing Zoning” alternative.

Utilities and Service Systems

Water quality, stormwater runoff, and the compliance with associated statutes and regulations would be similar as the proposed project. The “No Project / Development in Accordance with Existing Zoning” alternative would have similar but reduced impacts as compared to the proposed project in this regard for both construction and operation.
With respect to the need for new or expanded water and wastewater facilities, the “No Project / Development in Accordance with Existing Zoning” alternative would reduce the population, and thus reduce impacts as compared to the proposed project. This alternative would develop 80 single-family residential units on APNs 061-240-001 and 061-210-001 and would require the use of individual septic systems.

This alternative would have similar construction-related impacts on water supplies as the proposed project due to the similarities for construction activities, equipment, and potential duration, as well as construction area. With respect to long-term operation, this alternative would require approximately 35.6-acre feet (AF) of water annually (a decrease in approximately 44.4 AF annually as compared to the proposed project). Since the “No Project / Development in Accordance with Existing Zoning” alternative would result in less that than 500 dwelling units a Senate Bill (SB) 610 Water Supply Assessment would not be necessary. Similar to the proposed project, this alternative would also be subject to BVWD’s rules, regulations and policies which include shortage measures as amended, modified, or superseded. Operational impacts related to water supply would continue to require similar mitigation as the proposed project.

According to the EPA’s (2003) “Construction and Demolition Amounts,” the overall waste generation rate of single-family construction is 4.39 pounds of waste per square foot constructed. Using the EPA waste generation rates, the “No Project / Development in Accordance with Existing Zoning” alternative is estimated to generate approximately 641.8 tons of solid waste during construction. Similar to the proposed project, this alternative would be required to comply with California Building Code requirements and divert a minimum of 50 percent of the construction waste. This results in a total estimated construction solid waste generation of 320.9 tons which is 345.6 tons lower than the proposed project’s projected construction debris tonnage of 666.5 tons, after diversion.

Using ratios obtained from CalRecycle’s (2013) Estimated Solid Waste Generation Rates for Residential Developments, the “No Project / Development in Accordance with Existing Zoning” alternative is estimated to generate approximately 12.23 pounds of solid waste per dwelling unit each day. As a result, the “No Project / Development in Accordance with Existing Zoning” alternative would generate approximately 194.2 tons of solid waste annually, which is 209.8 tons less than the 404 tons generated annually by the proposed project.

**Conclusion**

**Avoid or Substantially Lessen Project Impacts**

The “No Project / Development in Accordance with Existing Zoning” alternative would lessen several impacts of the proposed project. The “No Project / Development in Accordance with Existing Zoning” alternative would require similar mitigation as that of the proposed project.

**Attainment of Project Objectives**

The “No Project / Development in Accordance with Existing Zoning” alternative would fail to meet or partially meet the following key Project Objectives described above in Section 7.1, PROJECT OBJECTIVES:
O3. Identify, inventory, and conserve onsite natural resources through project design, avoidance, clustered development, designated building envelopes, and significant open space creation and protection.

O4. Create a planned community of appropriate density and scale that respects the existing topography and natural backdrop of the project site.

O5. Implement Shasta County General Plan provisions by developing a clustered rural residential development at densities allowed by the General Plan, on a site that is close to existing development.

O9. Reduce fire hazards, and increase and improve fire safety for the project site and adjoining area.

O10. Provide complete avoidance of all jurisdictional waters of the United States and implement a management plan to manage these resources throughout the life of the project.

O11. Maximize open space for protection of sensitive natural resources, while providing a portion of the housing needs in Shasta County.

O13. Provide pedestrian paths along the paved roadway as required by the County and allow for bridle paths for horses to travel in the subdivision.

O14. Provide significant onsite oak woodland preservation and implement an oak management strategy designed to maintain and enhance the onsite oak resource.

**Comparative Merits**

Similar to the proposed project, the “No Project / Development in Accordance with Existing Zoning” alternative is consistent with the County’s existing General Plan land use for the site and would continue to allow the property owner’s ability to develop the site in the future in accordance with the Shasta County General Plan and zoning for the site. Under this alternative, the total number of residential dwelling units anticipated is assumed to be reduced from 166 to 80 representing a reduction of 86 units, or approximately 51 percent. The 325.6 acres of Unclassified (U) zoning would remain available for other types of unspecified future use that is consistent with the Shasta County General Plan, and said development may also result in impacts. Under this alternative, the efficient and orderly integration planning of future land uses would not be achieved to the degree of the proposed project.

This alternative would not require the same level of circulation, water, sewer, and other infrastructure improvements based on the reduction of residential units that would be achieved. Similar to the proposed project, this alternative could be served by a CSD, although the magnitude and beneficial approach to resource management of onsite resources would likely be less than that proposed for the TRCSD given all onsite resources would likely be included within privately owned parcels.

The “No Project / Development in Accordance with Existing Zoning” alternative would have similar, but slightly reduced impacts compared to the proposed project in the categories of aesthetics, air quality, biological resources, greenhouse gas emissions, public services, traffic and circulation, and utilities and
services systems. Cumulative impacts related to agricultural and biological resources would remain significant and unavoidable under this alternative. Impacts associated with the remaining categories would be equivalent to, or slightly greater than, that of the proposed project.

**“NON-CLUSTERED LARGE LOT” ALTERNATIVE**

**Description of the Alternative**

Under the “Non-Clustered Large Lot” alternative, a more traditional grid-like development pattern and circulation system would be required and assumes the 715.4-acre site would be developed at under the Rural Residential 5-Acre Minimum (RR-BA-5) zone classification. For the purpose of analyzing this alternative, the following land use and zoning is assumed.

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<th>Assessors’ Parcel Number</th>
<th>Gross Acreage</th>
<th>Existing General Plan</th>
<th>Zoning</th>
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<td></td>
<td></td>
<td><strong>64.41 ac / 6.4 units</strong></td>
<td><strong>650.99 ac / 130 units</strong></td>
<td><strong>136.4</strong></td>
</tr>
</tbody>
</table>

Note: This calculation does not account for any other physical or environmental constraints that may affect the development potential of the site.

This alternative would result in 136 single-family residential lots developed on the 715.4-acre project site. Under this alternative, the total number of residential dwelling units anticipated would be reduced by 30 single-family units, or approximately 18 percent, and 9 percent of these units, or 12 lots, would have accessory dwelling units. This alternative may not require the same level of circulation, water, sewer, and other infrastructure improvement based on the reduction of residential units that would be achieved. Similar to the proposed project, this alternative could be served by a CSD, although the approach to resource management and onsite preservation would likely be less than that proposed for the TRCSD given the large lot concept.
Impacts Compared to Project Impacts

Aesthetics

With the “Non-Clustered Large Lot” alternative, development of 136 single-family residential units and 12 accessory dwelling units would occur on APNs 061-240-001, 061-210-001, 078-060-036, 078-060-039, and 078-250-002 subject to applicable design regulations of the Shasta County General Plan. This alternative would reduce the number of units developed onsite by 30 single-family dwelling and 3 accessory dwelling units. The residential development would be built with more of a traditional grid-like development pattern and circulation system and the approach to resource management and onsite preservation would likely be less than the proposed project. The “Non-Clustered Large Lot” alternative would lack the larger preservation open space areas that would be created under the proposed project. Although, this alternative would be subject to the same regulations concerning aesthetics and light and glare, the overall aesthetic impact associated with this alternative is assumed to be slightly greater than that of the proposed project over the long-term.

Agricultural Resources

Although the “Non-Clustered Large Lot” alternative would reduce the overall dwelling units, it would not maintain the larger open space areas. This alternative would also be required to comply with MM 5.2-1, as described in Section 5.2, AGRICULTURAL RESOURCES, but this alternative and the proposed project would both result in significant and unavoidable cumulative impacts to agriculture resources as a result of converting Grazing Land to rural residential uses. Direct impacts to agriculture resources under this alternative are slightly greater when compared to the proposed project, and remain cumulatively significant and unavoidable.

Air Quality

As shown in Table 5.3-7, MITIGATED CONSTRUCTION-RELATED EMISSIONS, the proposed project’s mitigated short-term construction emissions would be below the Shasta County Air Quality Management District’s (SCAQMD’s) applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the “Non-Clustered Large Lot” alternative. Comparatively, the operational air quality impacts under this alternative would be proportionally reduced (approximately 18 percent) when compared to the proposed project, as 30 fewer single-family units would be constructed. This alternative would also be required to comply with MM 5.3-1, as described in Section 5.3, AIR QUALITY, to reduce short-term construction air emissions to a less than significant level.

As indicated in Table 5.3-8, LONG-TERM OPERATIONAL EMISSIONS, the proposed project would exceed the SCAQMD’s Level A and Level B operational thresholds for ROG, and Level A thresholds for NOx. As shown, implementation of MM 5.3-2 would reduce ROG levels to below the Level B significance threshold. In order to address NOx emissions, feasible SMM would be implemented per SCAQMD guidance as required by MM 5.3-3. Comparatively, the operational air quality impacts under this alternative would be proportionally reduced when compared to the proposed project, as 30 fewer single-family units and 3 fewer accessory units would be constructed on APNs 061-240-001, 061-210-001, 078-060-036, 078-060-039, and 078-250-002. Based on fewer residential units, it is assumed that fewer vehicle trips would result in less operational emissions and impacts to air quality are less compared to the proposed project. This
Alternatives to the Proposed Project

Overall, the “Non-Clustered Large Lot” alternative would create fewer impacts with regard to air quality emissions, as a decrease in daily vehicle trips would result in less air quality emissions when compared to the proposed project. Cumulative air quality impacts would remain significant and unavoidable.

Biological Resources

The “Non-Clustered Large Lot” alternative would result in an increased conversion of annual grassland and oak woodlands on APNs 061-240-001, 061-210-001, 078-060-036, 078-060-039, and 078-250-002, compared to the proposed project. This alternative would have overall larger lot sizes and a traditional roadway grid which would likely lead to less resource management and onsite preservation. Although this alternative would also be required to comply with MM 5.4-1a through MM 5.4-1k, as described in Section 5.4, BIOLOGICAL RESOURCES, this alternative and the proposed project would result in significant and unavoidable cumulative impacts to biological resources as a result of converting of oak woodlands to urban uses. Direct impacts to biological resources under this alternative are greater when compared to the proposed project, and remain cumulatively significant and unavoidable.

Cultural Resources

The “Non-Clustered Large Lot” alternative would yield 136 single-family residential units and 12 accessory dwelling units onsite. Anticipated ground disturbance would be greater to that of the proposed project and potential impacts to cultural and paleontological resources would be similar. As a result, similar cultural resource mitigation measures (refer to MM 5.5-1a and MM 5.5-1b in Section 5.5, CULTURAL RESOURCES) identified for the proposed project would be required to be implemented under the “Non-Clustered Large Lot” alternative. Impacts would continue to be less than significant.

Geology and Soils

The “Non-Clustered Large Lot” alternative would 136 units on 5-acre lots over the 715.4-acre site. Because the “Non-Clustered Large Lot” alternative has fewer overall single-family and accessory dwelling units, fewer future residents would be affected because there would be fewer units to occupy. While geologic impacts would be slightly reduced, they would continue to be less than significant under both the “Non-Clustered Large Lot” alternative and proposed project. Both the proposed project and this alternative would be constructed in the same geologic setting and both would conform to the same constructed standards to reduce seismic effects.

Greenhouse Gases and Climate Change

Greenhouse gas (GHG) emissions from construction and operational activities would also occur with the “Non-Clustered Large Lot” alternative, although to a lesser extent (an approximately 18 percent decrease in units and associated in daily vehicle trips) compared to the proposed project. The “Non-Clustered Large Lot” alternative would generate a proportional 18 percent decrease in GHG mitigated emissions compared to the proposed project, resulting in approximately 3,079.85 MTCO\textsubscript{2}eq/yr. Impacts under this alternative would be slightly reduced compared to the proposed project.
Hazards and Hazardous Materials

Under the “Non-Clustered Large Lot” alternative, impacts related to construction activities associated with hazards, hazardous materials, and hazardous substances would be similar although slightly reduced as compared to the proposed project. Fewer units would be constructed and the duration that construction equipment would be needed onsite may be shortened; however, the type of equipment needed would be the same. Although development would result in fewer dwelling units and a smaller population, the “Non-Clustered Large Lot” alternative is located in the same location and would introduce new people and structures to a VHFHSZ. Thus, this alternative would have similar impacts (increased residential activities that could be potential fire sources such as outdoor BBQs and backyard fire-pits) as compared to the proposed project. Impacts with respect to interfering with an adopted emergency response plan or emergency evacuation plan, exposure to wildland fires would be similar. Similar mitigation identified for the proposed project would be required to be implemented under the “Non-Clustered Large Lot” alternative, which result in impacts remaining less than significant.

Hydrology and Water Quality

The “Non-Clustered Large Lot” alternative would develop the 715.4-acre site in a more grid-like development pattern and traditional circulation system compared to the proposed project. Although this alternative includes fewer single-family residential units and accessory dwelling units, it would not derive the benefits of the larger open-space preservation areas, and potential impacts related to surface hydrology may be slightly increased compared to the proposed project. With respect to water quality, the design and construction of site facilities of the “Non-Clustered Large Lot” alternative shall comply with the statewide General Permit (Water Quality Order No. R5-2016-0040) and would be subject to the requirements of Shasta County Code, Chapter 12.12 related to grading. Compliance with the statewide General Permit and Shasta County Code, Chapter 12.12 would serve to ensure that short-term surface water quality impacts regarding water quality (non-point source pollutants), although slightly increased, would remain less than significant.

Land Use and Planning

Under the “Non-Clustered Large Lot” alternative, the 715.4-acre site would be developed as allowed under the zoning for the property. For the purpose of this alternative, it is assumed that APNs 061-240-001, 061-210-001, 078-060-036, 078-060-039, and 078-250-002 would developed consistent with R-R-BA-5, for a total single-family unit yield of 136 single-family residential lots and 12 accessory dwelling units. The 5-acre parcels that would be developed under the “Non-Clustered Large Lot” alternative is consistent with the current Shasta County General Plan land use designations. Impacts would be similar to the proposed project.

Noise

With mitigation incorporated, construction noise associated with the “Non-Clustered Large Lot” alternative would result in similar impacts to surrounding sensitive receptors compared to the proposed project. Noise levels would then be less than established standards. Although development under the “Non-Clustered Large Lot” alternative would be over a similar area, fewer residences would be constructed and mobile noise along access routes to and from the site due to movement of equipment and workers would be slightly reduced. The project’s construction-related vibration impacts would also...
be slightly reduced due to less residential construction. Under both alternatives impacts would be *less than significant*. Short-term noise impacts from grading and construction activities would occur with the “Non-Clustered Large Lot” alternative due to construction of the residential structures and improvements. Comparatively, this alternative’s construction-related noise impacts would be similar to proposed project; however, given the reduced number of single-family unit development, impacts would be slightly reduced. Therefore, the *less than significant* short-term and long-term operation noise impacts that would occur with the proposed project would occur also with the “Non-Clustered Large Lot” alternative. Overall, the “Non-Clustered Large Lot” alternative would create impacts that are similar when compared to the proposed project.

**Population and Housing**

Under the “Non-Clustered Large Lot” alternative, up to 136 single-family residential units can be assumed for the site. The California Department of Finance County population and housing estimates for 2016 show that the Shasta County has 2.5 persons per household (DOF, 2016).² Single-family residences and accessory dwelling units are assumed to have the same square footage for development as under the proposed project, but be on larger lots. It is assumed that typical single-family residences would be up to 3,550 square feet in area and that secondary units would be up to 1,200 square feet. Based on County-wide averages, each primary single-family dwelling would have 2.5 residents, and each secondary unit would have 2 residents. Because this alternative would provide new single-family residential units, it would directly increase the County’s population by approximately 364 people.

This increase is less (approximately 81 persons) than the 445 population increase projected for the proposed project. Although, increases to population as a result of the “Non-Clustered Large Lot” alternative would be slightly less than the proposed project, this alternative would be providing housing in accordance with the County’s planned population and housing increases as set forth in the Shasta County General Plan. This alternative would not result in displacement of houses or population. Therefore, population and housing impacts under the “Non-Clustered Large Lot” alternative would be *less than significant* and slightly less than the proposed project.

**Public Services and Fiscal Impacts**

This alternative would result in the construction of approximately 136 single-family residential units and would increase the population by approximately 364 people. The increase of 364 residents would represent less than one percent increase in population for the County, a smaller population increase than anticipated by the proposed project. This would result in a proportional reduction in all public service needs.

With respect to schools, this alternative would result in a smaller increase in public school student population as compared to the proposed project where the additional residents would generate an additional 40 school children. This alternative would result in reduced school fees (currently $3.36 per square foot for residential construction; however, these fees are reassessed in July of each year). As discussed in Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, the schools serving the project site have been experiencing declining enrollment.

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² The Department of Finance provides the persons per household for cities and counties. These numbers do not differentiate between the types of housing (i.e., single family residential vs. multi-family residential).
With respect to parks and recreation, this alternative would result in a decreased need for additional park and recreation services as compared to the proposed project. This alternative would increase the population by approximately 364 people, which would result in a reduced impact as compared to the proposed project.

Similar to fire and law enforcement services, schools, and parks, this alternative would result in reduced impacts to library, roadway maintenance, and transit services as compared to the proposed project. Therefore, overall, the “Non-Clustered Large Lot” alternative impacts on public services would be less than the proposed project.

With respect to fiscal impacts, the proposed project is estimated to have a positive impact on the County General Fund from 2017 through the end of the estimate buildout of the project (refer to Appendix 15.8, FISCAL IMPACT ANALYSIS). At the estimated buildout date of 2026, the project is estimated to generate General Fund revenues of $234,221. General Fund expenditures associated with the proposed project ($162,225) results in a net General Fund surplus of approximately $72,000. The “Non-Clustered Large Lot” alternative includes 30 fewer single-family residential units and 3 fewer accessory dwelling units so the overall contribution to County revenue sources, including property tax revenue, property transfer tax revenue, and sales tax revenue would be lower than the proposed project. As a result, the overall positive impact to the County’s General Fund would be less when compared to the proposed project.

Recreation

The “Non-Clustered Large Lot” alternative would be anticipated to increase the population by approximately 364 people. There are several National and State parkland facilities, national forests, and Bureau of Land Management holdings within the region available to potential park users. The use of existing parks and recreational facilities would be less when compared to the proposed project. This alternative also would not provide permanent open space preservation that could be utilized by subdivision and neighborhood residents. The “Non-Clustered Large Lot” alternative is therefore not considered as beneficial to recreation as the proposed project.

Traffic and Circulation

The “Non-Clustered Large Lot” alternative would generate residential traffic associated with employment, school, public services, and shopping. Given this decrease in trip generation, and that fewer trips would occur during the AM and PM peak periods as compared to the proposed project, this alternative would have less traffic and circulation impacts as compared to those of the proposed project.

Tribal Cultural Resources

The “Non-Clustered Large Lot” alternative would develop the proposed project site in a more traditional grid-like development pattern. Because of the larger overall lot size, the anticipated ground disturbance would be similar compared to that of the proposed project and potential impacts to Tribal Cultural Resources also would be similar compared to the proposed project. Additionally, similar mitigation measures for Tribal Cultural Resources identified for the proposed project would be required to be implemented under the “Non-Clustered Large Lot” alternative. Impacts would continue to be less than significant under the “Non-Clustered Large Lot” alternative.
Utilities and Service Systems

Water quality, stormwater runoff, and the compliance with associated statutes and regulations would be similar to the proposed project. The “Non-Clustered Large Lot” alternative would result in fewer single-family residences and accessory dwellings but they would occur on larger lots. The “Non-Clustered Large Lot” alternative would follow all statutes and regulations for all phases of construction and those related to utility and service system installation and operation. This alternative would have a slightly reduced impact as compared to the proposed project in this regard for both construction and operation.

With respect to the need for new or expanded water and wastewater facilities, the “Non-Clustered Large Lot” alternative would reduce the population, and thus reduce impacts as compared to the proposed project. This alternative would develop 136 single-family residential units and utilize a community wastewater collection system similar to that proposed by the project.

This alternative would have slightly reduced construction-related impacts on water supplies compared to the proposed project. The “Non-Clustered Large Lot” alternative would result in 30 fewer single-family residences and 3 fewer accessory dwelling units requiring less water. With respect to long-term operation, this alternative would require approximately 65 AF of water annually (a decrease in approximately 15 AF annually as compared to the proposed project). Similar to the proposed project, this alternative would also be subject to Bella Vista Water District’s (BVWD) rules, regulations and policies which include shortage measures as amended, modified, or superseded. Operational impacts related to water supply would be expected to be slightly reduced, but may be similar due to potential increased water demand on the larger lot sizes. Both the “Non-Clustered Large Lot” alternative and proposed project would continue to require similar mitigation.

According to the EPA’s (2003) “Construction and Demolition Amounts,” the overall waste generation rate of single-family construction is 4.39 pounds of waste per square foot constructed. Using the EPA waste generation rates, the “Non-Clustered Large Lot” alternative is estimated to generate approximately 1,091 tons of solid waste during construction. Similar to the proposed project, this alternative would be required to comply with California Building Code requirements and divert a minimum of 50 percent of the construction waste. This results in a total estimated construction solid waste generation of 545.7 tons which is 120.8 tons lower than the proposed project’s projected construction debris tonnage of 666.5 tons, after diversion.

Using ratios obtained from CalRecycle’s (2013) Estimated Solid Waste Generation Rates for Residential Developments, the “Non-Clustered Large Lot” alternative is estimated to generate approximately 12.23 pounds of solid waste per dwelling unit each day. As a result, the “Non-Clustered Large Lot” alternative would generate approximately 330.3 tons of solid waste annually, which is 73.7 tons less than the 404 tons generated annually by the proposed project.

Conclusion

Avoid or Substantially Lessen Project Impacts

The “Non-Clustered Large Lot” alternative would not lessen most of the impacts identified proposed project and would require similar mitigation as that identified for the proposed project.
Attainment of Project Objectives

The “Non-Clustered Large Lot” alternative would fail to meet Project Objectives O3, O4, O5, O11, O12, and O14. The following Project Objectives would be partially met under this alternative:

O9. Reduce fire hazards, and increase and improve fire safety for the project site and adjoining area.

O10. Provide complete avoidance of all jurisdictional waters of the United States and implement a management plan to manage these resources throughout the life of the project.

Comparative Merits

Under the “Non-Clustered Large Lot” alternative, development assumes the 715.4-acre site would be developed at the Rural Residential 5-Acre Minimum (RR-BA-5) zone classification. The intent of this alternative is to avoid or substantially reduce significant impacts associated with the proposed project. The purpose of the “Non-Clustered Large Lot” alternative is to provide an alternative describing a more traditional grid-like development pattern and circulation system and to analyze a project that would be developed at the Rural Residential 5-Acre Minimum (RR-BA-5) zone classification.

Although the “Non-Clustered Large Lot” alternative would result in construction of fewer single-family residential units on the site, this alternative would not result in the large open space preservation areas that would be created with the proposed project. This would lead to impacts associated with aesthetics, agricultural resources, and biological resources being slightly greater than the proposed project. Due to the reduction of 30 single-family residential units and 3 fewer accessory dwelling units, impacts to air quality, geology and soils, greenhouse gases, hazards and hazardous materials, land use, noise, traffic, utilities and service systems, would be reduced when compared to the proposed project. However, mitigation measures similar to the proposed project to reduce some of these impacts would be required. Impacts related to agricultural resources (cumulative), air quality (cumulative), biological resources (cumulative), and greenhouse gases (project-level and cumulative) would remain significant and unavoidable under this alternative.

The Fiscal Impact Analysis (Willdan, 2016) provides the results of the fiscal impact analysis year-by-year from the beginning of the development period through 2026 for the proposed 166-unit project. The proposed project is estimated to have a positive impact on the County General Fund from 2017 through the end of the estimate buildout of the project. At the estimated buildout date of 2026, the project is estimated to generate General Fund revenues of $234,221. General Fund expenditures associated with the proposed project ($162,225) results in a net General Fund surplus of approximately $72,000.

The “Non-Clustered Large Lot” alternative would develop 136 residential units on 5-acre lots. Although this alternative does have larger lot sizes, as a result of the reduced dwelling units (and associated population) assumed under this alternative, the overall contribution to County revenue sources, including property tax revenue, property transfer tax revenue, and sales tax revenue would be lower than the proposed project. As a result, the overall positive impact to the County’s General Fund would be less when compared to the proposed project. The “Non-Clustered Large Lot” alternative would not meet Project Objective O1 and O2 to the same extent as the proposed project.
“REDUCED DENSITY” (25% REDUCTION) ALTERNATIVE

Description of the Alternative

The purpose of the “Reduced Density” (25% Reduction) alternative is to reduce impacts from the proposed project related to the number of units developed. Under this alternative, the total number of residential dwelling units anticipated is assumed to be reduced from 166 to 125 representing a reduction of 41 units, or approximately 25 percent. As required by the Shasta County General Plan policies, all single-family homes would be on two-acre minimum lots, and all development on individual lots would avoid slopes greater than 30 percent. It is assumed that all lots would be built in the areas planned for Phases 1 and 5 of the proposed project. The area of developed land would be approximately 250 acres. As a variation of this alternative, the site could be developed with higher density product by further clustering the site, leaving increased natural open space and reducing the extent and cost of infrastructure improvements and site grading.

Similar to the proposed project, although every approved residential lot would be entitled to a secondary unit pursuant to Government Code Section 65852.2, it is assumed that approximately 9 percent of lots would have secondary units. Therefore, for purposes of this environmental analysis, it is assumed that 11 accessory dwelling units would be developed under this alternative.

The “Reduced Density” alternative is assumed to include the formation of the Tierra Robles CSD, in a capacity similar to that proposed by the project. It is assumed, however, that this alternative may not require the same level of circulation, water, wastewater improvement based on a reduction in population.

Impacts Compared to Project Impacts

Aesthetics

The “Reduced Density” alternative would reduce the number of residential dwelling units developed onsite by 25 percent. Thus, the potential impacts related to aesthetics and light and glare would be reduced when compared with the proposed project. The “Reduced Density” alternative would be subject to the same mitigation measures and regulation concerning aesthetics and, light and glare which would ensure less than significant impacts on visual quality. Impacts from this alternative would be similar or slightly less when compared to the proposed project.

Agricultural Resources

This alternative assumes the conversion of 250 acres designated by the FMMP as Grazing Land into single-family residential lots. Compared to the proposed project Grazing Land impact of 533.27 acres, this alternative would result in an approximate 283.27-acre reduction in impact acreage to onsite Grazing Land resources. Although this alternative would also be required to comply with MM 5.2-1, as described in Section 5.2, AGRICULTURAL RESOURCES, this alternative and the proposed project would result in significant and unavoidable cumulative impacts to agriculture resources as a result of converting Grazing Land to residential uses. Direct impacts to agriculture resources under this alternative are less when compared to the proposed project, but remain cumulatively significant and unavoidable.
Air Quality

As shown in Table 5.3-7, MITIGATED CONSTRUCTION-RELATED EMISSIONS, the proposed project’s mitigated short-term construction emissions would be below the Shasta County Air Quality Management District’s (SCAQMD’s) applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the “Reduced Density” alternative. Comparatively, the construction-related air quality impacts would be proportionally reduced (approximately 25 percent) when compared to the proposed project, as the ground-disturbing activities would occur over a reduced area. This alternative would also be required to comply with MM 5.3-1, as described in Section 5.3, AIR QUALITY, to reduce short-term construction air emissions to a less than significant level.

As indicated in Table 5.3-8, LONG-TERM OPERATIONAL EMISSIONS, the proposed project would exceed the SCAQMD’s Level A and Level B operational thresholds for ROG, and Level A thresholds for NOX. As shown, implementation of MM 5.3-2 would reduce ROG levels to below the Level B significance threshold. In order to address NOX emissions, feasible SMM would be implemented per SCAQMD guidance as required by MM 5.3-3. Comparatively, the operational air quality impacts under this alternative would be proportionally reduced (approximately 25 percent) when compared to the proposed project, as 125 single-family units would be constructed. Based on fewer residential units, it is assumed that fewer vehicle trips would result in less operational emissions. Impacts to air quality are less compared to the proposed project. This alternative would also be required to comply with MM 5.3-2 and MM 5.3-3, as described in Section 5.3, AIR QUALITY, to reduce long-term air emissions to a less than significant level.

Overall, the “Reduced Density” alternative would create fewer impacts with regard to air quality emissions, as a decrease in daily vehicle trips would result in less air quality emissions when compared to the proposed project, but remain cumulatively significant and unavoidable.

Biological Resources

The “Reduced Density” alternative would result in a similar conversion annual grassland and oak woodlands, although reduced when compared to the proposed project. Although this alternative would also be required to comply with MM 5.4-1a through MM 5.4-1k, as described in Section 5.4, BIOLOGICAL RESOURCES, this alternative and the proposed project would result in significant and unavoidable cumulative impacts to biological resources as a result of converting of oak woodlands to urban uses. Direct impacts to biological resources under this alternative are less when compared to the proposed project, but remain cumulatively significant and unavoidable.

Cultural Resources

The “Reduced Density” alternative would result in the development of 250 acres onsite, yielding 125 single-family residential units and up to 11 accessory dwelling units. Although, the anticipated ground disturbance would be less than that of the proposed project, potential impacts to cultural and paleontological resources would be similar to the proposed project. As a result, similar cultural resource mitigation measures identified for the proposed project would be required to be implemented under the “Reduced Density” alternative.
**Geology and Soils**

The “Reduce Density” alternative would develop approximately 250 acres of the overall 715.4-acre site, approximately 221.92 acres less than the 471.92-acre development footprint of the proposed project. Thus, impacts associated with earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and landslides would be similar when compared to the proposed project. Impacts would continue to be less than significant under the “Reduced Density” alternative.

**Greenhouse Gases and Climate Change**

GHG emissions from construction and operational activities would also occur with the “Reduced Density” alternative, although to a lesser extent (an approximately 25 percent decrease units and associated in daily vehicle trips) compared to the proposed project. The “Reduced Density” alternative would generate a proportional 25 percent decrease in GHG mitigated emissions compared to the proposed project, resulting in approximately 2816.94 MTCO$_2$eq/yr.

**Hazards and Hazardous Materials**

Under the “Reduced Density” alternative, the impacts related to construction activities associated with hazards and hazardous materials would be similar to the proposed project because the development is similar and construction equipment needed would be similar. Development would result in a smaller population using the proposed project site; however, the land use would be residential under this alternative. Thus, this alternative would have similar negative impacts (introduction of new people and structures to a VHFHSZ and increased residential activities that could be potential fire sources such as outdoor BBQs and backyard fire-pits) as compared to the proposed project. Similar mitigation identified for the proposed project would be required of to be implemented under the “Reduced Density” alternative.

**Hydrology and Water Quality**

The “Reduced Density” alternative would develop approximately 250 acres of the overall 715.4-acre site, approximately 221.92 acres less than the 471.92-acre development footprint of the proposed project). Therefore, the area to be developed footprint would be slightly less that of the proposed project. Grading and infrastructure would still be required under this alternative, therefore, impacts related to surface hydrology would be similar to the proposed project. Similarly, with respect to water quality, this alternative would also comply with the statewide General Permit (Water Quality Order No. R5-2016-0040) and would be subject to the requirements of *Shasta County Code*, Chapter 12.12 related to grading. Compliance with the statewide General Permit and *Shasta County Code*, Chapter 12.12 would serve to ensure that short-term surface water quality impacts regarding water quality (non-point source pollutants) would be less than significant under the “Reduced Density” alternative.

**Land Use and Planning**

The “Reduced Density” alternative, like the proposed project would proposed a Zone Amendment to apply the Planned Development (PD) zone classification over the entire 715.4-acre site. The “Reduced Density” alternative would have the same less than significant impacts with regard to land use. The proposed project has a density of 1 dwelling unit per 4.4 gross acres. The 2-acre parcels that would be developed
under the “Reduced Density” alternative, while acceptable under current Shasta County General Plan land use designations, would be less consistent with the surrounding area than the proposed project.

**Noise**

Construction noise associated with the proposed project would result in similar impacts to surrounding sensitive receptors and would require mitigation measures. Noise levels would then be less than established standards. Construction activities would cause less mobile noise along access routes to and from the site due to movement of equipment and workers due to the reduction in development as compared to the proposed project. The proposed project’s construction-related vibration impacts would also be similar to the proposed project and would be less than significant. Short-term noise impacts from grading and construction activities would occur with the “Reduced Density” alternative due to construction of the residential structures and improvements. Comparatively, this alternative’s construction-related noise impacts would be less as compared to the proposed project, given this alternative would result in a smaller 125 single-family unit development. Therefore, the less than significant short-term and long-term operation noise impacts that would occur with the proposed project would occur also with the “Reduced Density” alternative. Overall, the “Reduced Density” alternative would create impacts that are similar, but reduced, when compared to the proposed project.

**Population and Housing**

Under the “Reduced Density” alternative, up to 125 single-family residential units can be assumed for the site. The California Department of Finance County population and housing estimates for 2016 show that the Shasta County has 2.5 persons per household (DOF, 2016). Single-family residences and secondary units would have the same square footage for development as under the proposed project. It is assumed that typical single-family residences would be up to 3,550 square feet in area and each of the 11 accessory dwelling units would be up to 1,200 square feet. Based on County-wide averages, each primary single-family dwelling would have 2.5 residents, and each secondary unit would have 2 residents.

Because this alternative would provide new single-family residential units, it would directly increase the County’s population by approximately 335 people. This increase is less (approximately 110 persons) than the 445 population increase projected for the proposed project. Although, increases to population as a result of the “Reduced Density” alternative would be slightly less than the proposed project because this alternative would provide housing for the increase in population, in accordance with the County’s planned population and housing increases as set forth in the Shasta County General Plan. This alternative would not result in displacement of houses or population. Population and housing impacts under the “Reduced Density” alternative would be less than significant and less than under the proposed project.

**Public Services and Fiscal Impacts**

This alternative would result in the construction of approximately 125 single-family residential units and would increase the population by approximately 335 people. The increase of 335 residents would represent less than one percent increase in population for the County, a smaller population increase than anticipated by the proposed project. This would result in a proportional reduction in all public service needs.
With respect to schools, this alternative would result in a smaller increase in public school student population as compared to the proposed project where the additional residents would generate an additional 62 school children. This alternative would result in reduced school fees (currently $3.36 per square foot for residential construction; however, these fees are reassessed in July of each year). As discussed in Section 5.13, PUBLIC SERVICES AND FISCAL IMPACTS, the schools serving the project site have been experiencing declining enrollment.

With respect to parks and recreation, this alternative would result in a decreased need for additional park and recreation services as compared to the proposed project. This alternative would increase the population by up to approximately 335 people. The alternative would result in a reduced impact as compared to the proposed project.

Similar to fire and law enforcement services, schools, and parks, this alternative would result in reduced impacts to library, roadway maintenance, and transit services as compared to the proposed project. Therefore, overall, the “Reduced Density” alternative impacts on public services would be less than the proposed project.

With respect to fiscal impacts, the proposed project is estimated to have a positive impact on the County General Fund from 2017 through the end of the estimate buildout of the proposed project (refer to Appendix 15.8, FISCAL IMPACT ANALYSIS). At the estimated buildout date of 2026, the proposed project is estimated to generate General Fund revenues of $234,221. General Fund expenditures associated with the proposed project ($162,225) results in a net General Fund surplus of approximately $72,000. As noted in the Fiscal Impact Analysis (Willdan, 2016), larger lots are estimated to have a higher assessed value and generate more property tax and property transfer tax revenue than smaller lots, while all households are estimated to generate the same expenditures regardless of parcel size.

The “Reduced Density” alternative would develop 125 residential units on 2-acre lots. As a result of the smaller lot sizes and reduced dwelling units (and associated population) assumed under this alternative, the overall contribution to County revenue sources, including property tax revenue, property transfer tax revenue, and sales tax revenue would be lower than the proposed project. As a result, the overall positive impact to the County’s General Fund would be less when compared to the proposed project.

**Recreation**

The “Reduced Density” alternative would be anticipated to increase the population by approximately 335 people. There are several National and State parkland facilities, national forests, and Bureau of Land Management holdings within the region available to potential park users. The use of existing parks and recreational facilities would be less when compared to the proposed project.

**Traffic and Circulation**

The “Reduced Density” alternative would generate residential traffic associated with employment, school, public services, shopping, etc. Given this decrease in trip generation, and that fewer trips would occur during the AM and PM peak periods as compared to the proposed project, this alternative would have less traffic and circulation impacts as compared to those of the proposed project.
**Tribal Cultural Resources**

The “Reduced Density” alternative would develop approximately 250 acres of the overall 715.4-acre site, approximately 221.92 acres less than the 471.92-acre development footprint of the proposed project. Although, the anticipated ground disturbance would be less than that of the proposed project, potential impacts to Tribal Cultural Resources would be similar to the proposed project. As a result, similar mitigation measures for Tribal Cultural Resources identified for the proposed project would be required to be implemented under the “Reduced Density” alternative. Impacts would continue to be less than significant under the “Reduced Density” alternative.

**Utilities and Service Systems**

Water quality, stormwater runoff, and the compliance with associated statutes and regulations would be similar as the proposed project. The “Reduced Density” alternative would have similar but reduced impacts as compared to the proposed project in this regard for both construction and operation.

With respect to the need for new or expanded water and wastewater facilities, the “Reduced Density” alternative would reduce the population, and thus reduce impacts as compared to the proposed project. This alternative would develop 125 single-family residential and utilize a community wastewater collection system similar to that proposed by the project.

This alternative would have similar construction-related impacts on water supplies as the proposed project due to the similarities for construction activities, equipment, and potential duration, as well as construction area. With respect to long-term operation, this alternative would require approximately 55.6 AF of water annually (a decrease in approximately 24.4 AF annually as compared to the proposed project). Similar to the proposed project, this alternative would also be subject to BVWD’s rules, regulations and policies which include shortage measures as amended, modified, or superseded. Operational impacts related to water supply would continue to require similar mitigation as the proposed project.

According to the EPA’s (2003) “Construction and Demolition Amounts,” the overall waste generation rate of single-family construction is 4.39 pounds of waste per square foot constructed. Using the EPA waste generation rates, the “Reduced Density” alternative is estimated to generate approximately 1,003 tons of solid waste during construction. Similar to the proposed project, this alternative would be required to comply with California Building Code requirements and divert a minimum of 50 percent of the construction waste. This results in a total estimated construction solid waste generation of 501.5 tons which is 165 tons lower than the proposed project’s projected construction debris tonnage of 666.5 tons, after diversion.

Using ratios obtained from CalRecycle’s (2013) Estimated Solid Waste Generation Rates for Residential Developments, the “Reduced Density” alternative is estimated to generate approximately 12.23 pounds of solid waste per dwelling unit each day. As a result, the “Reduced Density” alternative would generate approximately 303.5 tons of solid waste annually, which is 100.5 tons less than the 404 tons generated by the proposed project annually.
Conclusion

Avoid or Substantially Lessen Project Impacts

The “Reduced Density” alternative would lessen most of the impacts identified as a result of the proposed project. The “Reduced Density” alternative would, however, require similar mitigation as that of the proposed project.

Attainment of Project Objectives

The “Reduced Density” alternative would meet most of the Project Objectives described above in Section 7.1, PROJECT OBJECTIVES. The following Project Objectives would be partially met under this alternative:

O1. Promote planned, orderly, and efficient patterns of rural residential development within central Shasta County on large lots, consistent with the existing neighborhood.

O2. Maximize positive fiscal contributions to County General Fund revenue.

Comparative Merits

The intent of this alternative is to avoid or substantially reduce significant impacts associated with the proposed project. With the construction of fewer residential units on the site, impacts associated with aesthetics, agricultural resources, air quality, greenhouse gases, hazards and hazardous materials, land use, noise, traffic, utilities and service systems, would be reduced when compared to the proposed project; however, mitigation measures similar to the proposed project would be required. Impacts related to agricultural resources (cumulative), air quality (cumulative), biological resources (cumulative), and greenhouse gases (project-level and cumulative) would remain significant and unavoidable under this alternative.

The Fiscal Impact Analysis (Willdan, 2016) provides the results of the fiscal impact analysis year-by-year from the beginning of the development period through 2026 for the proposed 166-unit project. The proposed project is estimated to have a positive impact on the County General Fund from 2017 through the end of the estimate buildout of the project. At the estimated buildout date of 2026, the project is estimated to generate a net General Fund surplus of approximately $72,000.

The fiscal impacts of the project vary over the development period based on the proportion of each lot size that will have been developed at a given time. Larger lots are estimated to have a higher assessed value and generate more property tax and property transfer tax revenue than smaller lots, while all households are estimated to generate the same expenditures regardless of size.

The “Reduced Density” alternative would develop 125 residential units on 2-acre lots. As a result of the smaller lot sizes and reduced dwelling units (and associated population) assumed under this alternative, the overall contribution to County revenue sources, including property tax revenue, property transfer tax revenue, and sales tax revenue would be lower than the proposed project. As a result, the overall positive impact to the County’s General Fund would be less when compared to the proposed project. The “Reduced Density” alternative would not meet Project Objective O1 and O2 to the same extent as the proposed project.
7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires an EIR to identify the environmentally superior alternative. The environmentally superior alternative is the one that would result in the fewest or least significant environmental impacts. Table 7-5, COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT, provides a comparison of each alternative’s impact in relation to the proposed project, as analyzed in Section 7.4, PROJECT ALTERNATIVES.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the project objectives, and an alternative’s ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. According to Table 7-5, the “No Project” alternative would be the environmentally superior alternative because it would eliminate all of the potentially significant impacts of the proposed project. However, while the “No Project” alternative is the environmentally superior alternative, it is not capable of meeting any of the basic objectives of the proposed project. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the “No Project” alternative is found to be environmentally superior, “the EIR shall also identify an environmentally superior alternative among the other alternatives.”

After the “No Project” alternative, the environmentally superior alternative to the proposed project is the one that would result in the fewest or least significant environmental impacts. Based on the evaluation undertaken, the “Reduced Density” alternative is the environmentally superior alternative.

Under the “Reduced Density” alternative, the total number of residential dwelling units anticipated is assumed to be reduced from 166 to 125 representing a reduction of 41 units, or approximately 25 percent. As required by the Shasta County General Plan policies, all single-family homes would be on 2-acre minimum lots, and all development on individual lots would avoid slopes greater than 30 percent. It is assumed that all lots would be built in the areas planned for Phases 1 and 5 of the proposed project. The “Reduced Density” alternative would develop approximately 250 acres of the overall 715.4-acre site, approximately 221.92 acres less than the 471.92-acre development footprint of the proposed project. Therefore, the area to be developed footprint would be slightly less that of the proposed project.

The “Reduced Density” alternative would reduce most of the proposed project’s identified potentially significant impacts associated with agricultural resources, air quality, biological resources, greenhouse gases, water supply, and traffic. However, this alternative would not avoid the project’s significant and unavoidable impacts related to cumulative loss of Grazing Land, cumulative loss oak woodlands, cumulative air quality or project-level and cumulative GHG impacts. As noted above, the “Reduced Density” alternative would partially achieve the project’s objectives, although at a proportionately reduced level. The overall contribution to County revenue sources, including property tax revenue, property transfer tax revenue, and sales tax revenue would be lower than the proposed project. As a result, the overall positive impact to the County’s General Fund would be less when compared to the proposed project. While the proposed project has a density of 1 dwelling unit per 4.4 gross acres, the “Reduced Density” alternative would not achieve efficient patterns of rural residential development within central Shasta County on larger lots to the degree that is achieved under the proposed project (i.e., 2-acre parcels that would be developed under the “Reduced Density” alternative, while acceptable under current Shasta County General Plan land use designations, would be less consistent with the surrounding area than the proposed project).
### Table 7-5
COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT

<table>
<thead>
<tr>
<th>EIR Chapter</th>
<th>Proposed Project Level of Impact After Mitigation</th>
<th>Alternative</th>
<th>Non-Clustered Large Lot</th>
<th>Reduced Density</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No Project</td>
<td>No Project / Development in Accordance with Existing Zoning</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.1 – Aesthetics</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/-</td>
<td>-</td>
</tr>
<tr>
<td>5.2 – Agricultural Resources</td>
<td>Significant &amp; Unavoidable (Cumulative)</td>
<td>+</td>
<td>=/-</td>
<td>-</td>
</tr>
<tr>
<td>5.3 – Air Quality</td>
<td>Significant &amp; Unavoidable (Cumulative)</td>
<td>+</td>
<td>=/+</td>
<td>=/+</td>
</tr>
<tr>
<td>5.4 – Biological Resources</td>
<td>Significant &amp; Unavoidable (Cumulative)</td>
<td>+</td>
<td>=/-</td>
<td>-</td>
</tr>
<tr>
<td>5.5 – Cultural Resources</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>5.6 – Geology and Soils</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=</td>
<td>=/+</td>
</tr>
<tr>
<td>5.7 – Greenhouse Gases and Climate Change</td>
<td>Significant &amp; Unavoidable (Project and Cumulative)</td>
<td>+</td>
<td>=/+</td>
<td>=/+</td>
</tr>
<tr>
<td>5.8 – Hazards and Hazardous Materials</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>5.9 – Hydrology and Water Quality</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=</td>
<td>=/-</td>
</tr>
<tr>
<td>5.10 – Land Use and Planning</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/-</td>
<td>=</td>
</tr>
<tr>
<td>5.11 – Noise</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/+</td>
<td>=/+</td>
</tr>
<tr>
<td>5.12 – Population and Housing</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/+</td>
<td>=/+</td>
</tr>
<tr>
<td>5.13 – Public Services and Fiscal</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/-</td>
<td>=</td>
</tr>
<tr>
<td>5.14 – Recreation</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/-</td>
<td>-</td>
</tr>
<tr>
<td>5.15 – Traffic and Circulation</td>
<td>Significant &amp; Unavoidable (Cumulative)</td>
<td>+</td>
<td>=</td>
<td>=/+</td>
</tr>
<tr>
<td>5.16 – Tribal Cultural Resources</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>5.17 – Utilities and Service Systems</td>
<td>Less Than Significant</td>
<td>+</td>
<td>=/+</td>
<td>=/+</td>
</tr>
</tbody>
</table>

**Attainment of Project Objectives**
- **+**: Impacts better/less than those of the proposed project.
- **=**: Impacts same as those of the proposed project.
- **-**: Impacts worse than those of the proposed project.
- **=/+**: Impacts equal to or slightly improved than those of the proposed project.
- **=/-**: Impacts equal to or slightly worse than those of the proposed project.