
19. ALTERNATIVES TO THE PROPOSED PROJECT

The potential environmental consequences of the proposed Middle Green Valley Specific Plan ("the project") have been analyzed in detail in this EIR. Four alternatives to the proposed project are discussed in this chapter to provide a basis for further understanding of the environmental effects of the proposed project and possible approaches to reducing identified significant impacts.

CEQA Guidelines section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project) requires an EIR to also "...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." CEQA Guidelines section 15126.6(b) states that, because the EIR must identify ways to mitigate or avoid significant effects of the proposed project on the environment, "[T]he 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."

CEQA Guidelines section 15126.6(d) indicates that the EIR comparison of the impacts of the identified alternatives is intended to be less detailed than the discussion of the impacts of the proposed project.¹ Following that guideline, the discussions in this chapter of the comparative impacts of three identified alternatives are intentionally less detailed than the discussions in EIR chapters 3 through 17 of the significant effects of the proposed project.

19.1 IDENTIFIED ALTERNATIVES

Pursuant to these CEQA Guidelines, this EIR chapter generally compares the environmental impacts anticipated with each of the following four alternatives with those of the proposed project:

- **Alternative 19.1: No Project--Existing Conditions.** CEQA Guidelines section 15126.6(e)(1) requires the specific alternative of No Project to "be evaluated along with its impact...to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." CEQA Guidelines section 15126.6(e)(2) requires the No Project analysis to "discuss the existing conditions at the time the (EIR) notice of preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans."

¹CEQA Guidelines section 15126.6(d) states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

Pursuant to these requirements, the Alternative 19.1 (No Project--Existing Conditions) evaluation in this chapter compares the effects of the proposed project with existing conditions, and Alternative 19.2 which follows (No Project--Anticipated Plan Area Growth Without the Proposed Specific Plan (Current Zoning)) compares the effects of the proposed project with "what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans" (CEQA Guidelines section 15126.6[e][2]).

- **Alternative 19.2: No Project--Anticipated Plan Area Future Growth Without the Proposed Specific Plan (Current Zoning Scenario).** Under this alternative, no new Specific Plan for the plan area would be implemented. Future development in the plan area would continue to be controlled by the County Zoning Ordinance as currently adopted. The entire plan area is currently designated on the County zoning map as A-20: Exclusive Agricultural (A) District, 20-acre minimum lot area. The Agricultural District is the largest single zone district classification on the County zoning map. The Zoning Ordinance standards for the A district are intended to preserve agriculture and protect the viability of the family farm by allowing minimum parcel sizes of from 20 to 160 acres, and restricting each parcel to one primary "agricultural homestay" single-family residence, one secondary dwelling "for family members," and for larger acreages, "a reasonable number of farm labor housing on or near the farming activity."

A review of plan area parcelization conducted by the Specific Plan team has indicated that the plan area is comprised of approximately 43 individual assessor's parcels, ranging in size from 0.04 to 280.4 acres. Approximately 25 of the 43 parcels are less than 20 acres in size. Based on these parcelization characteristics, the Specific Plan design team has determined that the current County General Plan and Zoning Ordinance could conceivably permit up to approximately 100 new primary single-family dwellings, in addition to the approximately 55 homes that currently exist in the plan area, plus associated new secondary units and other agricultural accessory structures including barns, packing sheds, small wineries, kennels, slaughterhouses, nurseries, stables, roadside stands, and other ag facilities.

Figure 19.1 provides a conceptual illustration of Alternative 19.2.

This alternative would necessarily rely on onsite water supply withdrawal and wastewater disposal; no common community water or sewer system would be introduced. This alternative would also exclude any common open space conservation and management mechanism, and associated long-term agricultural viability and biological resource management program. This alternative would also exclude a possible plan area elementary school and fire station site.

Alternative 19.1 would result in reduced peak period traffic (intersection) impacts and associated critical air pollutant and greenhouse gas emission impacts, but would otherwise be substantially less energy efficient. The alternative would also have substantially increased potential for adverse aesthetic impacts on views from Green Valley Road and other important vantage points, as well as higher potentials for cumulative areawide vegetative and wildlife habitat impacts; and lower potentials for maintaining habitat linkages and wildlife movement corridors.

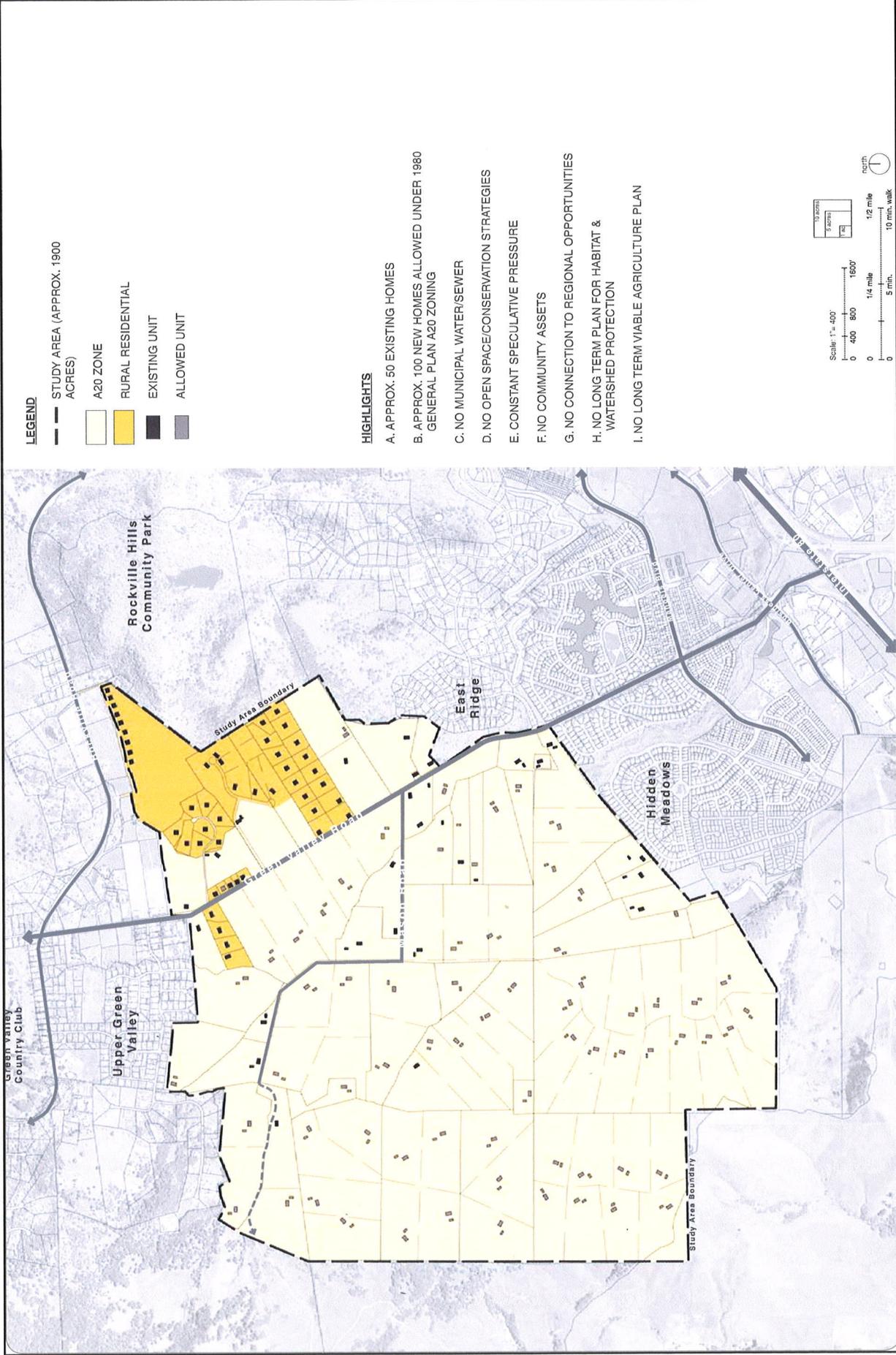


Figure 19.1
ALTERNATIVE 19.2:
CURRENT GENERAL PLAN AND ZONING DEVELOPMENT SCENARIO

SOURCE: Hart Howerton, Planners and Architects

Wagstaff and Associates ■ Urban and Environmental Planners

Middle Green Valley Specific Plan EIR

This alternative would also prohibit the Specific Plan-proposed economic plan for continued and increased sustainable agricultural production in the plan area. The potential for development credits to property owners who would voluntarily forego or limit development of their agricultural lands would be eliminated. The potential economic scale and ability of a conservancy to provide farmers economic assistance towards agricultural viability would also be eliminated.

- **Alternative 19.3: Alternative Specific Plan--Modified Specific Plan Land Use Layout to Avoid Prime Farmland Areas.** Under this alternative, a new Specific Plan for the plan area would be adopted and implemented with the same development program as the proposed project--i.e., with the same number of new primary single-family residential units, "capped at a maximum of 400, plus the same combination of associated new secondary residential units (up to 100), commercial service uses (chapel, farm stand, community recreation center, land conservancy office, possible neighborhood elementary school, and possible fire house), agricultural tourism uses (commodity processing and commercial nurseries, agricultural tourism retail, and possible inn), and neighborhood commercial uses (neighborhood-serving office and retail); and a similar system of roads and infrastructure. However, the land use and circulation framework would be reconfigured to avoid the Prime Farmland areas shown in green on Figure 4.1, Important Farmland in Plan Area Vicinity, in chapter 4, Agricultural and Mineral Resources, of this Draft EIR

Under the proposed project, nearly all of the four Specific Plan-designated neighborhood development areas would encompass Prime Agricultural land--approximately 189 acres. Roughly 66 acres of this total would be comprised of land use designations that would foster continued primary use for sustained, high-yield agricultural production--i.e., Agricultural Residential (5-acre minimum residential lots) and Rural Farm (2 to 5 acres per unit). However, roughly 123 acres of the Prime Farmland would be comprised of residential and other land use designations that would not foster continued high-yield agricultural production--i.e., Rural Neighborhood (1 to 4 units per acre) and Rural Mixed-Use Center (4 to 8 units per acre) land use designations.

Under Alternative 19.2, the roughly 123 acres of higher intensity land use designations would be shifted from the Prime Farmland areas to non-Prime-Farmland locations on the valley floor. As indicated on Figure 4.1 in chapter 4, such other locations would primarily be meadow areas along the west edges of the Prime Farmland area well west of Green Valley Road.

These alternative development areas would displace existing cultivated agricultural lands, would have a greater potential for exposure to views from Green Valley Road and other important vantage points (see Figure 3.3), and would result in greater development exposure to existing 100-year flood and dam failure inundation (see Figure 11.2). The air quality, biological resources, cultural and historic resources, energy, noise, public health and safety, public services and utilities and transportation and circulation impacts of Alternative 19.2 would be similar to the proposed project.

- **Alternative 19.4: Alternative Specific Plan--Reduced Development Capacity ("200/200 Plan").** Under this alternative, a new Specific Plan for the plan area would be adopted and implemented with a development program similar to the proposed project, but with modified primary and secondary residential unit "caps" (i.e., a maximum of up to 200 new primary and 200 new secondary residential units, rather than the up to 400 new primary and 100 new

secondary units under the proposed project), and corresponding reductions (approximately 30 percent) in the extent of commercial service, agricultural tourism and neighborhood commercial uses.

This "200/200 Plan" would incorporate only the proposed Elkhorn Neighborhood footprint (see Figures 2.8 in Draft EIR chapter 2, Project Description), including the Elkhorn foothills, to achieve this development capacity (assuming all new primary units could also include a new secondary unit).

This alternative would have environmental benefits in comparison to the proposed project, primarily including corresponding reductions in Prime Farmland conversion, traffic-related regional air and greenhouse gas emissions, biological habitat disturbance, cultural (archaeological) resource disturbance, energy use, construction noise, sewer and water demands, and peak hour intersection impacts. This alternative would also have a significant adverse effect on the economic viability of the Specific Plan program. In particular, the reduced level of permitted residential development would destabilize the Specific Plan-proposed economic plan for continued and increased sustainable agricultural production in the plan area. The potential for development credits to property owners who would voluntarily forego or limit development of their agricultural lands would be substantially reduced. The potential economic scale and ability of a conservancy to provide farmers economic assistance towards agricultural viability would also be correspondingly reduced.

19.2 COMPARATIVE ENVIRONMENTAL EVALUATION

CEQA Guidelines section 15126.6(d) states, "A matrix displaying the major characteristics may be used to summarize the comparison [of alternatives]." Accordingly, Table 19.1 (Alternatives Comparison to the Proposed Project: Summary Overview) provides a summary comparison of the environmental impacts of each of the four identified alternatives with those of the proposed project (Specific Plan).

Table 19.1
ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

<u>Impact</u>	<u>Alternatives</u>			
	<u>Alternative 1: No Project-- Existing Conditions</u>	<u>Alternative 2: No Project-- Future without Specific Plan</u>	<u>Alternative 3: Modified Specific Plan Layout</u>	<u>Alternative 4: Specific Plan w/ Reduced Capacity</u>
(a) Aesthetics	No new environmental impacts. No permanent open space preservation benefits.	Substantially increased potential for adverse impacts on views from Green Valley Road and on valued overall rural character of valley.	Relocation of approx. 123 ac. of higher intensity land use from Prime Farmland areas to non-Prime-Farmland locations would substantially increase potential for new development visibility from Green Valley Rd. and diminish rural character of valley.	Reduced level and area of new residential and other related development would reduce project contribution to cumulative countywide aesthetic effects. Like project, all new development areas would be effectively hidden from Middle Green Valley Rd. views. However, viability of proposed Green Valley Conservancy and related visual resource protection program would be destabilized.
(b) Agricultural and Mineral Resources	No new environmental impacts. No agricultural viability benefits.	No viable economic program for sustaining and enhancing plan area farming and ranching would be established--i.e., no Green Valley Agricultural Conservancy, Agricultural Business Plan, or TDR program; agricultural decline in valley would continue.	Similar beneficial impacts in sustaining and enhancing plan area farming and ranching activity; less Prime Farmland loss.	Potentially less conversion of Prime Farmland and other agricultural property; but also substantially reduced viability of proposed Green Valley Agricultural Conservancy, Agricultural Business Plan, and TDR program; agricultural decline in valley more likely to continue.
(c) Air Quality	No new environmental impacts.	Reduced number of residential units and reductions in trip generation and traffic impacts would reduce assoc. regional emissions.	Emissions impacts similar to those of proposed project.	Reduced number of residential units and reductions in trip generation and traffic impacts would reduce assoc. regional emissions.

SOURCE: Wagstaff/MIG

Table 19.1 (continued)

ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

<u>Impact</u>	<u>Alternatives</u>			
	<u>Alternative 1: No Project-- Existing Conditions</u>	<u>Alternative 2: No Project-- Future without Specific Plan</u>	<u>Alternative 3: Modified Specific Plan Layout</u>	<u>Alternative 4: Specific Plan w/ Reduced Capacity</u>
(d) Biological Resources	No new environmental impacts. No permanent open space preservation benefits.	Potentially greater impacts due to more dispersed development pattern, less protection of riparian and other wildlife movement corridors, and lack of a viable Conservancy and other common mechanisms for managing and protecting plan area natural resources.	Impacts and benefits similar to proposed project.	Direct impacts less than proposed project; however economic viability of a Green Valley Conservancy for management and protection of valley natural resources would be destabilized.
(e) Climate Change	No new environmental impacts.	Reduced number of residential units and associated reductions in trip generation and traffic congestion would reduce associated GHG emissions. No Specific Plan-advocated residential energy conservation design guidelines would be adopted.	GHG emissions impacts similar to proposed project.	Reduced number of residential units and associated reductions in trip generation and traffic congestion would reduce GHG emissions.
(f) Cultural and Historic Resources	No new environmental impacts. No permanent open space preservation benefits.	Potential impacts of a conventional rural residential development pattern on unrecorded cultural artifacts similar to or greater than proposed project.	Potential for significant impacts on unrecorded cultural resources similar to proposed project.	Potential for significant impacts on unrecorded cultural resources substantially less than proposed project.
(g) Energy	No new environmental impacts.	Cumulative energy use similar to, but slightly less than, proposed project.	Cumulative energy use similar to proposed project.	Cumulative energy use substantially less than proposed project.
(h) Geology and Soils	No new environmental impacts.	Potential for adverse geotechnical (slope stability, erosion, etc.) impacts greater than for proposed project due to lack of strategic development clustering.	Potential geotechnical impacts similar to proposed project.	Potential geotechnical impacts less than proposed project.

SOURCE: Wagstaff/MIG

Table 19.1 (continued)

ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

<u>Impact</u>	<u>Alternatives</u>			
	<u>Alternative 1: No Project-- Existing Conditions</u>	<u>Alternative 2: No Project-- Future without Specific Plan</u>	<u>Alternative 3: Modified Specific Plan Layout</u>	<u>Alternative 4: Specific Plan w/ Reduced Capacity</u>
<i>(i) Hydrology and Water Quality</i>	No new environmental impacts.	Potential hydrology and water quality impacts similar to or worse than proposed project.	Potential hydrology and water quality impacts similar to proposed project.	Potential hydrology and water quality impacts less than proposed project.
<i>(j) Land Use and Open Space</i>	No new environmental impacts. No permanent open space preservation benefits.	General Plan-recommended Specific Plan formulation would not occur; General Plan objectives to preserve rural character of plan area with some opportunity for compatible residential development, to serve development with water and wastewater services, to protect valley resources, to address farming and ranching viability, and to protect valley natural resources would not be attained.	General Plan-recommended Specific Plan formulation would occur; General Plan objective to preserve rural character of plan area with some opportunity for compatible residential development less effectively implemented due to substantial increase in development visibility from Green Valley Rd.	General Pan-recommended Specific Plan formulation would occur; General Plan objective to preserve rural character of plan area with some opportunity for compatible residential development less effectively implemented due to destabilized viability of economic plan for sustained farming and ranching, open space preservation, and natural resource management.
<i>(k) Noise</i>	No new environmental impacts.	Impacts less than proposed project.	Impacts similar to proposed project.	Impacts less than proposed project.
<i>(l) Population and Housing</i>	No new environmental impacts.	Population and housing growth impacts less than the proposed project.	Population and housing growth impacts same as the proposed project.	Population and housing growth impacts less than the proposed project.
<i>(m) Public Health and Safety</i>	No new environmental impacts.	Impacts similar to proposed project.	Impacts similar to proposed project.	Impacts less than proposed project.
<i>(n) Public Services and Utilities</i>	No new environmental impacts.	Full reliance on on-site water supply withdrawal and wastewater disposal; no common water or sewer system; no increase in viability of recycled water use; no viable common mechanism for areawide infrastructure operation and maintenance.	Impacts similar to proposed project.	Reduced viability of common water and wastewater service and recycled water use.

SOURCE: Wagstaff/MIG

Table 19.1 (continued)

ALTERNATIVES COMPARISON TO PROPOSED PROJECT: SUMMARY OVERVIEW

<u>Impact</u>	<u>Alternatives</u>			
	<u>Alternative 1: No Project-- Existing Conditions</u>	<u>Alternative 2: No Project-- Future without Specific Plan</u>	<u>Alternative 3: Modified Specific Plan Layout</u>	<u>Alternative 4: Specific Plan w/ Reduced Capacity</u>
(o) Transportation and Circulation	No new environmental impacts.	Reduced trip generation and traffic impacts.	Trip generation and traffic impacts similar to proposed project.	Trip generation and traffic impacts substantially less than proposed project.
(p) Attainment of Project Objectives	No attainment.	No attainment.	Limited attainment. Rural character preservation objective much less effectively implemented due to substantial increase in development visibility from Green Valley Rd.	Reduced or no attainment; viability of economic plan for sustained farming and ranching, open space preservation and natural resource management significantly destabilized.

SOURCE: Wagstaff/MIG

19.3 CONCLUSIONS: ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Table 19.1 provides a summary comparison of the environmental implications of the various identified project alternatives for all of the environmental issues considered in this EIR. When viewed together, Table 19.1 indicates that, of the various alternatives evaluated in this chapter, **Alternative 19.4: Alternative Specific Plan--Reduced Development Capacity ("200/200 Plan")**, the plan with up to 200 new primary residential units and up to 200 associated new secondary residential units, would result in the least adverse combination of environmental impacts and would therefore represent the "environmentally superior alternative" under CEQA. However, this "environmentally superior alternative" would be substantially less effective than the proposed project in attaining the economic balance between compatible development and sustained farming and ranching, open space preservation, and natural resource management through viable development rights transfer and conservancy mechanisms, and therefore may not constitute a feasible project.