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ALTERNATIVES ANALYSIS

13.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed Zoning Text Amendment, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

13.2 PURPOSE OF ALTERNATIVES

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to “[...] 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.” In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, “The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” Section 15126.6(f) of CEQA Guidelines further states:

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but

would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).

- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination [...] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- 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 (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

The project alternatives need to feasibly attain most of the basic objectives of the project, but avoid or substantially lessen any of the significant effects of the project. The policy focus of the proposed Zoning Text Amendment is to preserve and protect farmland while also enhancing the economic viability of Placer County's agricultural operations and supporting the tenants of agri-tourism, a type of tourism that brings visitors directly to a farm or ranch. The Zoning Text Amendment is intended to balance the needs of various stakeholder groups and support the core principle that the primary use of the property is to cultivate and process agriculture in order to make a locally grown and value-added product.

Significant Impacts Identified for the Proposed Project

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Significant environmental impacts (including cumulative impacts) of the proposed project that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

Less Than Significant with Mitigation

The EIR concluded that the following impacts would be reduced to a less-than-significant level with implementation of mitigation:

- **Biological Resources.** The EIR determined that implementation of the proposed project could result in potential adverse effects to protected nesting birds, sensitive aquatic habitat, and trees. However, the EIR requires mitigation in order to ensure that impacts related to such would be less than significant.
- **Cultural Resources.** The EIR determined that grading related to the provision of additional parking areas for events may result in the disturbance of previously unknown cultural resources, including human remains. However, the EIR requires mitigation in order to ensure that impacts related to cultural resources would be less than significant.
- **Noise.** The EIR determined that non-transportation noise associated with weddings, which would be a new type of Special Event allowable under the proposed Zoning Text Amendment, could conflict with the County's established thresholds at the property lines of the nearest sensitive receptors for both existing and future study facilities. However, the EIR requires mitigation in order to ensure that impacts related to noise would be less than significant.

Significant and Unavoidable

The EIR has determined that the following project impact would remain significant and unavoidable:

- **Transportation and Circulation.** The EIR determined that the proposed project would result in a cumulatively considerable contribution to the cumulative impact at the SR 49/Cramer Road intersection under the Cumulative Plus Project Condition. While future study facilities may contribute their fair share to the cost of SR 49 corridor improvements by paying into the Traffic Impact Fee Program, Placer County cannot guarantee that improvements to the SR 49/Cramer Road intersection would occur. As such, in the absence of feasible mitigation, the project's incremental contribution to the cumulatively considerable impact to the SR 49/Cramer Road intersection would remain cumulatively considerable and significant and unavoidable.

Less Than Significant Impacts

As discussed in each respective section of this EIR, the proposed project would result in no impact or a less-than-significant impact related to the following topics associated with the resource area indicated:

- ***Agricultural Resources.*** The EIR determined that impacts related to all agricultural resources issue areas would be less than significant, and mitigation would not be required.
- ***Air Quality and Greenhouse Gas Emissions.*** The EIR determined that impacts related to air quality and greenhouse gas (GHG) emissions would be less than significant, and mitigation would not be required.
- ***Biological Resources.*** The EIR determined that impacts related to oak woodlands, wildlife corridors and wildlife nursery sites, and conflicts with the County's draft PCCP would be less than significant, and mitigation would not be required.
- ***Land Use and Planning.*** The EIR determined that impacts related to all land use and planning issue areas would be less than significant, and mitigation would not be required.
- ***Noise.*** The EIR determined that no impact would occur related to airport noise, construction noise, and groundborne vibration. In addition, impacts related to exposure of people to or generation of off-site and on-site traffic noise in excess of established standards would be less than significant. For such impacts, mitigation would not be required.
- ***Transportation and Circulation.*** The EIR determined that no impact would occur related to changes in air traffic patterns. With the exception of the significant and unavoidable cumulative impact identified for the SR 49/Cramer Road intersection, impacts related to all other transportation and circulation issue areas would be less than significant, and mitigation would not be required.
- ***Utilities and Service Systems.*** The EIR determined that impacts related to all utilities and service systems issue areas would be less than significant, and mitigation would not be required.

In addition to the project-specific impacts listed above, a number of cumulative impacts associated with each issue area were determined to be less-than-significant or less than cumulatively considerable. Furthermore, the Initial Study prepared for the proposed project determined that no impacts or less-than-significant impacts would occur to the following issue areas, and mitigation would not be required:

- Aesthetics (all items);
- Geology and Soils (all items);
- Hazards and Hazardous Materials (all items);

- Hydrology & Water Quality (Items IX-1 and -3 through -12);
- Land Use and Planning (Items X-2 through -5, -6, and -8);
- Mineral Resources (all items);
- Noise (Items XII-4 and -5);
- Population and Housing (all items);
- Public Services (all items);
- Recreation (all items);
- Transportation and Traffic (Item XVII-8); and
- Utilities and Service Systems (Item XIX-4).

13.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to “set forth only those alternatives necessary to permit a reasoned choice.” As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the basic project objectives. As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

- (i) failure to meet most of the basic project objectives,
- (ii) infeasibility, or
- (iii) inability to avoid significant environmental impacts.

Regarding item (ii), infeasibility, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

It should be noted that because the proposed project consists of changes to the County’s currently adopted Winery Ordinance, rather than site-specific physical development, analysis of an off-site alternative was dismissed from detailed analysis in this EIR.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project Alternative;
- Wedding CUP Requirement Alternative; and
- Reduced Intensity Alternative.

See Table 13-4 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed Zoning Text Amendment. It should be noted that the following analysis focuses on the potentially significant impacts identified for each issue area per the EIR prepared for the proposed Zoning Text Amendment, unless otherwise noted. As a result, the analysis does not include discussion of the following CEQA topics: Aesthetics; Agricultural Resources; Air Quality and Greenhouse Gas Emissions; Land Use and Planning; Geology and Soils; Hazards and Hazardous Materials; Mineral Resources; Population and Housing; Public Services; Recreation; and Utilities and Service Systems. All impacts for such CEQA topics, including cumulative impacts, were determined to be less than significant in the EIR and Initial Study, and mitigation was not required.

No Project Alternative

CEQA requires the evaluation of the comparative impacts of the “No Project” alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

“... discuss [...] existing conditions [...] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” (*Id.*, subd. [e][2]) “If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property’s existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build,’ wherein the existing environmental setting is maintained.

However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.” (*Id.*, subd. [e][3][B]).

The County has decided to evaluate a No Project Alternative, which assumes that the County would not approve the proposed Zoning Text Amendment and the currently adopted Winery Ordinance would not be altered. The adopted Winery Ordinance would continue to apply to existing and future wineries within Placer County, but would not explicitly address farm breweries.

A total of six promotional events per year would continue to be permitted at the existing facilities with an Administrative Review Permit (ARP). In addition, the minimum parcel size for establishment of a winery in the Residential (RA and RF) and Agricultural and Resource (AE, F, FOR) zoning districts would continue to be 4.6 acres. Large production wineries (20,000+ cases annually) would not require a 10-acre minimum parcel size. Furthermore, because the Winery Ordinance would not be updated to include clarified hours of operation, existing and future wineries within the County would continue to operate with unrestricted hours.

Because the No Project Alternative would not increase the minimum requirement of on-site planted vineyards from one acre to two acres for future wineries, future wineries developed within the County would not be required to provide the same focus on production of agricultural goods as would be required under the proposed Zoning Text Amendment. In addition, because the No Project Alternative would not require a 10-acre minimum parcel size for by-right development of new wineries within the Residential and Agricultural and Resource zoning districts, potential incompatibilities with existing agricultural operations could continue to occur. Thus, the No Project Alternative would not meet the project objectives.

Biological Resources

Under the current Winery Ordinance and following the proposed Zoning Text Amendment, existing study facilities would have the ability to expand permanent parking spaces within their sites in order to accommodate tasting room guests, agricultural activities, and event attendees. Expansion of permanent parking areas could require tree removal and, thus, could result in impacts to protected birds in the absence of mitigation. In addition, associated grading activities could disturb sensitive riparian habitat and aquatic resources. Under the No Project Alternative, study facilities would not be granted the ability to host an increased number of events, as would occur under the proposed Zoning Text Amendment. Thus, existing and future wineries would not be incentivized to expand permanent parking areas in order to accommodate an increased number of events. Overall, impacts to biological resources would be fewer under the Alternative compared to the proposed project.

Cultural Resources

Grading associated with development of new permanent parking areas could result in disturbance to previously unknown cultural resources. As noted above, under the No Project Alternative, existing study facilities within the County would not be incentivized to expand permanent parking

areas. Thus, impacts to cultural resources would be fewer under the Alternative compared to the proposed project.

Noise

Under the No Project Alternative, weddings would not be considered an allowable Special Event use at existing and future wineries within the County. Therefore, Mitigation Measures 9-3 and 12-8 would not be required in order to ensure that non-transportation noise associated with weddings does not result in conflicts with the County's established thresholds at the property lines of the nearest sensitive receptors. It should be noted that because the No Project Alternative would not establish hours of operations for facilities covered by the Winery Ordinance, events at such facilities could occur later in the evening, potentially resulting in conflicts with the County's Noise Ordinance. Nonetheless, overall, impacts related to noise would be fewer under the No Project Alternative.

Transportation and Circulation

Under the No Project Alternative, the total number of permitted promotional events would continue to be capped at six per year at existing and future study facilities within the County with an ARP. Under the proposed Zoning Text Amendment, the new category of Agricultural Promotional Events could occur without limit and Special Events would be capped at 12 per year for large parcel-sized facilities and six per year at medium parcel-sized facilities. Thus, compared to the proposed Zoning Text Amendment, vehicle trip generation associated with each study facility would be reduced. Because trips associated with events would not increase relative to existing conditions, the significant and unavoidable cumulative impact to the SR 49/Cramer Road intersection would be avoided. Overall, impacts related to transportation and circulation would be not occur under the No Project Alternative.

Wedding CUP Requirement Alternative

Under the Wedding CUP Requirement Alternative, all of the changes included in the proposed Zoning Text Amendment would still apply, with the exception of the inclusion of weddings as a category of Special Event. Weddings would not be permitted by-right at wineries/farm breweries within the County. Rather, each facility would be required to obtain discretionary approval of a Conditional Use Permit (CUP) by the Placer County Planning Commission, which would ensure site-specific review of the facility. For facilities which are granted a CUP to conduct weddings, such weddings would still be subject to all applicable restrictions included in the proposed Zoning Text Amendment. The County's required findings for approval of a CUP are as follows, per Section 17.58.140 of the Placer County Code:

Required Findings for ARP, MUP, and CUP (17.58.140 (A and B))

- A. Findings Required For Approval. No administrative review permit, minor or conditional use permit shall be approved unless the zoning administrator or planning commission (or board of supervisors in the event of an appeal) shall first find that:

1. The proposed use is consistent with all applicable provisions of this chapter and any applicable provisions of other chapters of this code.
2. The proposed use is consistent with applicable policies and requirements of the Placer County general plan, and any applicable community plan or specific plan, and that any specific findings required by any of these plans are made.
3. The establishment, maintenance or operation of the proposed use or building will not, under the circumstances of the particular case, be detrimental to the health, safety, peace, comfort and general welfare of people residing or working in the neighborhood of the proposed use, or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the county; except that a proposed use may be approved contrary to this finding where the granting authority determines that extenuating circumstances justify approval and enable the making of specific overriding findings.
4. The proposed project or use will be consistent with the character of the immediate neighborhood and will not be contrary to its orderly development.
5. The proposed project will not generate a volume of traffic beyond the design capacity of all roads providing access to the project, either those existing or those to be improved with the project unless a specific design deficiency is acknowledged and approved in conjunction with the adoption of a general plan or community plan applicable to the area in question.
6. In a TPZ zone district (Article 17.16), the establishment, maintenance and operation of the proposed use or building will not significantly detract from the use of the property for, or inhibit the growing and harvesting of timber.
7. Any findings required by Articles 17.06 through 17.52 (Zone districts and allowable uses of land) for the approval of proposed uses in specific zone districts or combining districts are made.
8. Any findings required by Article 17.56 (Specific Use Requirements) for the approval of specific uses are made.
9. As required by Section 18.16.040 of this code (Environmental Review) when a proposed negative declaration has been prepared for the project that, on the basis of the initial study and any comments received, there is no substantial evidence that the project will have a significant effect on the environment; or
10. As required by Section 18.20.070 of this code (Environmental Review) when a final environmental impact report has been prepared for the project, that the project as approved will not have a significant effect on the environment, or that the granting authority has:
 - a. Eliminated or substantially lessened all of the significant effects on the environment, where feasible (as defined and used in Section 21061.1 of the California Public Resources Code); and
 - b. Determined that any remaining unavoidable significant effects on the environment are acceptable due to specified overriding considerations.
11. As required by Section 18.08.020 of this code (Environmental review) when the proposed project meets the criteria discussed in the applicable section, that the project is:
 - a. Statutorily exempt from the provisions of CEQA; or
 - b. Categorically exempt from the provisions of CEQA; or

- c. Not subject to environmental review pursuant to the provisions of Section 18.08.020(D) (“General rule”).
12. The proposed use is consistent with, replaces or appropriately modifies any prior established relevant conditions of a previous entitlement, if applicable.
- B. Conditions of Approval. In conditionally approving an administrative review permit, minor or conditional use permit, the granting authority shall adopt conditions of approval as necessary to accomplish the following objectives, consistent with the requirements of state law:
1. Specify the period of validity of the permit and/or the allowed duration of the proposed use. The permit may be issued and/or the use allowed for a revocable, permanent, temporary or otherwise limited term, as deemed appropriate by the granting authority. If no period of validity is specified, the permit shall be subject to the time limits specified by Section 17.58.160 (Permit time limits and extensions).
 2. Ensure that the proposed project will be consistent with all applicable requirements of this chapter, the Placer County general plan, and any applicable community plan or specific plan.
 3. Enable all the findings required by subsection A of this section to be made by the granting authority.
 4. Mitigate environmental impacts identified in environmental documents prepared pursuant to Chapter 18 of this code (Environmental Review), or adopt overriding findings pursuant to Section 15091 et seq., of the CEQA Guidelines.
 5. Require the dedication of rights-of-way determined by the granting authority to be necessary as a result of the proposed use.
 6. Require the installation, or participation in the cost of installation, of specified on-site or off-site improvements determined by the granting authority to be necessary as a result of the proposed use.
 7. Supersede, replace, or modify conditions of approval applicable to the site as a result of a previous permit approval, where determined by the granting authority to be appropriate.
 8. Limit the size of the project or intensity of the use to a level approved by the granting authority.
 9. The granting authority may also adopt any other conditions of approval as the authority determines are necessary to protect the public health, safety, and general welfare.

Although weddings hosted at wineries and farm breweries would help to support agri-tourism within the County, the Wedding CUP Requirement Alternative would require additional approvals prior to hosting weddings. Thus, the Alternative would be less supportive of agri-tourism and the needs of winery/farm brewery owners within the County. However, generally, the project objectives would be met under the Wedding CUP Requirement Alternative.

Biological Resources

The Wedding CUP Requirement Alternative would not alter the total number of Agricultural Promotional Events and Special Events allowable by right at study facilities relative to the proposed Zoning Text Amendment. For facilities that ultimately do not receive a CUP to host weddings, Agricultural Promotional Events and Special Events would continue to be permitted to occur at the same frequency; thus, weddings could be replaced by other types of Special Events. Therefore, compared to the proposed Zoning Text Amendment, the same potential exists for existing study facilities to expand permanent parking spaces within their sites in order to accommodate tasting room guests, agricultural activities, and event attendees. Expansion of permanent parking areas could require tree removal and, thus, could result in impacts to protected birds in the absence of mitigation. In addition, associated grading activities could disturb sensitive riparian habitat and aquatic resources. Thus, Mitigation Measures 6-2(a) and 6-2(b) would still be required, and impacts to biological resources would be similar under the Alternative compared to the proposed project.

Cultural Resources

As noted above, under the Wedding CUP Alternative, the same potential exists for existing study facilities to expand permanent parking spaces within their sites. Grading associated with development of new permanent parking areas could result in disturbance to previously unknown cultural resources. Therefore, Mitigation Measures 7-1(a) and 7-1(b) would still be required. Impacts to previously unknown cultural resources associated with grading of new permanent parking areas would be similar compared to the proposed project.

Noise

Under the Wedding CUP Requirement Alternative, weddings would not be allowable by-right at existing and future wineries and farm breweries within the County. For study facilities seeking approval of a CUP to host weddings, project-level review would be provided by County staff to ensure that such weddings would not result in adverse environmental effects. Therefore, Mitigation Measure 9-3 would not be required for existing facilities not meeting the setbacks, noted in Table 9-11 of the EIR, in order to ensure that non-transportation noise associated with weddings does not result in conflicts with the County's established noise thresholds at the property lines of the nearest sensitive receptors. Because Mitigation Measures 9-3 and 12-8 would not be required, and County discretionary review of CUP applications would ensure that wedding event noise would be in compliance with the Noise Ordinance standards at the nearest residential property lines, impacts related to noise would be fewer under the Wedding CUP Alternative.

Transportation and Circulation

As discussed in Chapter 10, Transportation and Circulation, of this EIR, weddings hosted at study facilities could involve the same trip generation intensity as other types of Special Events allowable under the proposed Zoning Text Amendment. Weddings are considered Special Events, and the proposed Zoning Text Amendment sets the maximum attendance for all Special Events at 100 attendees for medium parcel-sized facilities and 200 attendees for large parcel-sized facilities.

Therefore, under the Wedding CUP Requirement Alternative, study facilities which do not receive a CUP to host weddings could still contribute the same amount of vehicle traffic to area roadways as was evaluated under the Existing Plus Project and Cumulative Plus Project Conditions. As such, the cumulatively considerable impact to the SR 49/Cramer Road intersection would remain significant and unavoidable. Overall, impacts related to transportation and circulation would be similar under the Wedding CUP Requirement Alternative.

Reduced Intensity Alternative

The Reduced Intensity Alternative is tied to the State's public water system requirements. Pursuant to Section 116275 of the California Health and Safety Code, a public water system is required if a facility serves more than 24 people daily, 60 days or more per year. Such standards currently apply to all wineries and farm breweries within Placer County. The type of public water system required is a Transient-Noncommunity (TNC) water system, which includes restaurants, campgrounds, small wineries, motels and other non-residential facilities. Consequently, existing and future study facilities seeking to host more than 24 people daily, 60 days or more per year, as result of the proposed Zoning Text Amendment, would be required to install a public water system and obtain a permit from the State Water Resources Control Board (SWRCB). Any new public water wells would need to be constructed in accordance with the California Department of Water Resources Bulletin 74-81, "Water Well Standards, State of California."

In addition to the restrictions on the number of Special Events permitted per year under the proposed project, the Reduced Intensity Alternative would limit the total number of event days permitted at each study facility to 59 per year. The other changes included in the proposed Zoning Text Amendment would still apply. The event quota could be met with Agricultural Promotional Events only, or with a mix of Agricultural Promotional Events and Special Events. By restricting the number of event days permitted annually to 59 total, events at existing and future study facilities within the County would not necessitate the installation of new public water wells and associated improvements, and any associated environmental effects would be avoided.

Because the Reduced Intensity Alternative would substantially curtail the total number of events permitted annually at existing and future study facilities, the Alternative could conflict with the needs of winery/farm brewery owners within the County. In addition, because Agricultural Promotional Events would help to support agri-tourism and agricultural production at wineries and farm breweries within the County, limiting such events could conflict with the County's goals of supporting agriculture. Therefore, the project objectives would be only partially met under the Reduced Intensity Alternative.

It should be noted that impacts related to utilities and service systems, including water supply, were determined to be less than significant in the EIR for both project-level and cumulative analyses of the proposed Zoning Text Amendment. Nonetheless, potential changes regarding water supply are discussed below for informational purposes in order to address public concerns submitted during the Notice of Preparation (NOP) review period for the proposed project.

Biological Resources

Under the Reduced Intensity Alternative, attendance limits for each event hosted at existing and future study facilities would not be altered compared to the proposed Zoning Text Amendment. Therefore, while a fewer number of events would be permitted to occur annually, the same potential exists under the Alternative for existing study facilities to expand permanent parking spaces within their sites in order to accommodate tasting room guests, agricultural activities, and event attendees. Expansion of permanent parking areas could require tree removal and, thus, could result in impacts to protected birds in the absence of mitigation. In addition, associated grading activities could disturb sensitive riparian habitat and aquatic resources. Thus, Mitigation Measures 6-2(a) and 6-2(b) would still be required, and impacts to biological resources would be similar under the Reduced Intensity Alternative compared to the proposed project.

Cultural Resources

As noted above, under the Reduced Intensity Alternative, the same potential exists for existing study facilities to expand permanent parking spaces within their sites. Grading associated with development of new permanent parking areas could result in disturbance to previously unknown cultural resources. Therefore, Mitigation Measures 7-1(a) and 7-1(b) would still be required. Impacts to previously unknown cultural resources associated with grading of new permanent parking areas would be similar compared to the proposed project.

Noise

Relative to the proposed Zoning Text Amendment, the Reduced Intensity Alternative would not alter the attendance limits associated with each individual event at existing and future facilities and weddings would still be an allowable use. Thus, non-transportation noise sources associated with weddings could still result in conflicts with the County's established noise thresholds at the property lines of the nearest sensitive receptors. Mitigation Measures 9-3 and 12-8 would still be required in order to ensure that impacts related to such are reduced to a less-than-significant level. Overall, impacts related to noise would be similar under the Reduced Intensity Alternative.

Transportation and Circulation

The Reduced Intensity Alternative would substantially curtail the total number of events permitted annually at existing and future study facilities. Under the proposed Zoning Text Amendment, a total of 105 event days are assumed to occur each year, with up to two events occurring on each event day. Under the Alternative, each study facility would be limited to a total of 59 event days. Up to two events would still be assumed to occur at each study facility during each event day.

Table 13-1 below provides a comparison of the total number of Agricultural Promotional Events and Special Events anticipated to occur under the Reduced Intensity Alternative as compared to the proposed Zoning Text Amendment.

Table 13-1			
Annual Events: Proposed Zoning Text Amendment vs. Reduced Intensity Alternative			
Type of Event	Number of Annual Events		
	Proposed Zoning Text Amendment	Reduced Intensity Alternative	Difference
Medium Parcel-Sized Facilities			
Regular Agricultural Promotional Event	196	104	-92
Rolling Agricultural Promotional Event	8	8	0
Special Event	6	6	0
Total:	210	118	-92
Large Parcel-Sized Facilities			
Regular Agricultural Promotional Event	190	98	-92
Rolling Agricultural Promotional Event	8	8	0
Special Event	12	12	0
Total:	210	118	-92

As shown in the table, under the Reduced Intensity Alternative, the total number of annual events assumed to occur at both medium and large parcel-sized study facilities would be reduced by approximately 92. Therefore, annual vehicle traffic associated with events covered by the County’s Winery Ordinance would be reduced at each study facility. Because trips associated with events would still contribute towards cumulative traffic volumes in the region, albeit at a lower frequency, the cumulatively considerable impact to the SR 49/Cramer Road intersection would likely remain significant and unavoidable. However, due to the reduction in trip generation, impacts related to transportation and circulation would be fewer under the Reduced Intensity Alternative.

Utilities and Service Systems

Under the Reduced Intensity Alternative, new public water wells would not be constructed at existing or future study facilities. In addition, because the total number of event days at each facility would be reduced from 105 under the proposed Zoning Text Amendment to 59 under the Alternative, overall annual water demand would be reduced from approximately 1.78 million gallons per year (mgy) to approximately 1.10 mgy for existing study facilities (see Table 13-2). For existing and future study facilities combined, annual water demand would be reduced from approximately 5.40 mgy to approximately 3.33 mgy (see Table 13-3). Therefore, for facilities which are not served by public water supply systems, total demand on groundwater supplies would be reduced. In addition, potential adverse physical environmental effects associated with construction of new public wells and associated infrastructure would be avoided. Overall, impacts related to utilities and service systems would be reduced under the Reduced Intensity Alternative.

Table 13-2										
Proposed Zoning Text Amendment vs. Reduced Intensity Alternative: Net Increase in Water Demand (Annual) for Existing Study Facilities										
Winery/Farm Brewery Size	Rolling Agricultural Promotional Events		Agricultural Promotional Events		Special Events		Total Annual Attendees/ Facility	Water Demand/ Attendee (gal)	# of Facilities	Addnl. Water Demand (mg)
	Events/yr	Max. Attendees	Events/yr	Max. Attendees	Events/yr	Max. Attendees				
Proposed Zoning Text Amendment										
Medium	8	150	196	50	6	100	11,600	15	8	1.39
Large	8	150	190	50	12	200	13,100	15	2	0.39
									Total:	1.78
Reduced Intensity Alternative										
Medium	8	150	104	50	6	100	7,000	15	8	0.84
Large	8	150	98	50	12	200	8,500	15	2	0.26
									Total:	1.10
Difference from Proposed Project:										-0.68

Table 13-3										
Proposed Zoning Text Amendment vs. Reduced Intensity Alternative: Net Increase in Water Demand (Annual) for Existing and Future Study Facilities										
Winery/Farm Brewery Size	Rolling Agricultural Promotional Events		Agricultural Promotional Events		Special Events		Total Annual Attendees/ Facility	Water Demand/ Attendee (gal)	# of Facilities	Addnl. Water Demand (mg)
	Events/yr	Max. Attendees	Events/yr	Max. Attendees	Events/yr	Max. Attendees				
Proposed Zoning Text Amendment										
Medium	8	150	196	50	6	100	11,600	15	22	3.83
Large	8	150	190	50	12	200	13,100	15	8	1.57
									Total:	5.40
Reduced Intensity Alternative										
Medium	8	150	104	50	6	100	7,000	15	22	2.31
Large	8	150	98	50	12	200	8,500	15	8	1.02
									Total:	3.33
Difference from Proposed Project:										-2.07

13.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, the No Project Alternative would be considered the environmentally superior alternative. As shown in Table 13-4 below, all impacts resulting from the proposed Zoning Text Amendment would be fewer under the No Project Alternative. In addition, the significant and unavoidable cumulative traffic impact identified for the proposed Zoning Text Amendment would be avoided.

Under the Wedding CUP Alternative, impacts related to biological resources, cultural resources, and transportation and circulation would be similar to the proposed Zoning Text Amendment. Impacts related to noise would be fewer, as Mitigation Measures 9-3 and 12-8 related to weddings would not be required. Under the Reduced Intensity Alternative, impacts to biological resources, cultural resources, and noise would be similar to the proposed Zoning Text Amendment, while impacts related to transportation and circulation would be fewer as a result of the reduced number of annual events occurring at study facilities within the County. In addition, while impacts related to utilities and service systems were dismissed as less than significant in this EIR, such impacts would be fewer under the Reduced Intensity Alternative. The significant and unavoidable cumulative traffic impact identified for the proposed Zoning Text Amendment would not be avoided under either the Wedding CUP Alternative or the Reduced Intensity Alternative.

With regard to selection of an environmentally superior alternative, Practice Under the California Environmental Quality Act, Second Edition, Vol. 1, states the following:¹

On the basis of the rule that an EIR should include sufficient information to allow a “meaningful evaluation, analysis, and comparison” with the project (15126.6(d)), when one of the alternatives is clearly environmentally superior to the project, it should be sufficient for the EIR to explain the environmental advantages and disadvantages of each alternative in comparison with the project.

Given that the Wedding CUP Alternative and the Reduced Intensity Alternative would result in generally similar environmental impacts, neither alternative is clearly environmentally superior to the other. However, due to the fact that the Wedding CUP Alternative would result in fewer impacts such that mitigation measures identified for the proposed project related to noise would not be necessary, whereas the Reduced Intensity Alternative would still require all the same mitigation measures as the proposed project, the Wedding CUP Alternative would be considered the environmentally superior alternative.

¹ Kostka, Stephen L. and Zischke, Michael H. *Practice Under the California Environmental Quality Act, Second Edition, Vol. 1* [pg. 15 to 43]. Updated March 2018.

**Table 13-4
Comparison of Environmental Impacts for Project Alternatives**

Resource Area	Proposed Project	No Project Alternative	Wedding CUP Requirement Alternative	Reduced Intensity Alternative
Biological Resources	Less Than Significant with Mitigation	Fewer	Similar	Similar
Cultural Resources	Less Than Significant with Mitigation	Fewer	Similar	Similar
Noise	Less Than Significant with Mitigation	Fewer	Fewer	Similar
Transportation and Circulation	Significant and Unavoidable	None	Similar*	Fewer*
Utilities and Service Systems	Less Than Significant	--	--	Fewer
Total Fewer:		4	1	2
Total Similar:		0	3	3
Total Greater:		0	0	0
<p>Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."</p> <p>* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.</p>				