8.0 PROJECT ALTERNATIVES
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INTRODUCTION

The purpose of this chapter is to identify and describe alternatives to the proposed project. Project alternatives are developed to reduce or eliminate the significant or potentially significant adverse environmental effects identified as a result of the proposed project, while still meeting most if not all of the basic project objectives.

California Environmental Quality Act Requirements

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the proposed project, or to the location of the proposed project that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines, section 15126.6). An EIR need not evaluate the environmental effects of alternatives at the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project. The CEQA Guidelines provide the following language for discussing alternatives to a proposed project:

The specific alternative of the “no project” shall also be evaluated along with its impacts...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 subd.(e)(2)).

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 proposed objectives, or would be more costly (CEQA Guidelines, Section 15126.6 subd.(b)).

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 subd.(d)).

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice....The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making....An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines, Section 15126.6 subd.(f)).

The requirement that an EIR evaluate alternatives to the proposed project or alternatives that address 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, the environmental impacts of the proposed project. The EIR need examine in detail only the alternatives that could feasibly attain most of the basic objectives of the project. The Public Resources Code and the CEQA Guidelines direct that the EIR need “set forth only those alternatives necessary to permit a reasoned choice.” The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and, thus, limit the number and type of alternatives that need to be evaluated in a given EIR. According to the CEQA Guidelines (section 15126.6 (b)):

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

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 (CEQA Guidelines, section 15126.6 (f)(1)).

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” (section 15126.6 (f)(2)(3)).

The selection of alternatives takes into account the project objectives provided in Chapter 3, Project Description. The project objectives are listed below.

- **Maintain a High Quality, Rural Lifestyle**
  
  Preserve the County’s rural, small town character, high quality of life, and agricultural heritage including quality farmlands.
  
  Promote uses that support the economic, cultural and scenic values of agriculture.
  
  Ensure opportunities for existing and future generations to live, work and succeed in Sutter County.
  
  Value and respect the County’s cultural diversity and traditions.

- **Support a Vibrant and Sustainable Economy**
  
  Create a healthy and diverse economy by providing a regulatory climate that attracts new industries and a broad range of jobs with livable wages and opportunities for advancement.
Maintain a viable agricultural industry by sustaining existing agricultural operations, diversifying the agricultural economy, and promoting agricultural businesses that utilize “cutting-edge” technology.

Enhance local shopping, services, and opportunities for small businesses.

- Ensure Managed and Efficient Growth

Focus new urban growth within the County’s cities and other clearly defined and comprehensively planned development areas.

Promote efficient development patterns that promote orderly growth and discourage sprawl.

Ensure new development is compatible with agricultural operations and open space preservation.

- Protect and Enhance Natural Resources

Protect environmental resources including the Sutter Buttes, river corridors, fish and wildlife habitats, and other significant resources for future generations.

Enhance public access to the rivers and maximize opportunities for residents and visitors to enjoy this resource.

- Provide a Safe Place to Live

Improve the levee system and provide sufficient and reliable flood protection for County residents and businesses.

Increase law enforcement’s presence to reduce crime, minimize youth delinquency, and improve the sense of security.

- Support a Variety of Mobility Options

Provide a safe and efficient transportation system that links communities within Sutter County, and connects the County to the rest of the region.

Ensure new development does not adversely impact traffic flows.

Enhance transit and commuter rail service to encourage higher ridership and reduce automobile dependence.

Provide additional interconnected bike lanes, pedestrian paths, and trails to promote alternative transportation choices and added recreational opportunities.
Improve roadway maintenance and safety.

- **Provide Adequate and Equitable Community Services and Infrastructure**

  Promote quality education, libraries, fire protection, health and other community services to adequately provide for existing and future residents and businesses.

  Work in partnership with the cities and other public and private entities to provide additional parks and enhance outdoor recreation opportunities for local residents and visitors, with priority in areas that are underserved.

  Explore opportunities to expand higher education in Sutter County.

  Enhance water and sewer services within the County, and preserve existing water rights.

- **Promote Resource Conservation and Sustainability**

  Promote alternative energy use, water conservation, solid waste reduction and recycling, and other strategies to ensure a more sustainable County.

  Support land use patterns, alternative mobility systems, “green” building and energy options, and other measures that reduce carbon emissions.

Equally important to attaining the project objectives is the reduction of some or all significant impacts, particularly those that could not be mitigated to a level below the threshold of significance. The project-specific and cumulative significant and unavoidable impacts of the proposed project, after mitigation, are identified below.

**Significant and Unavoidable Impacts**

6.3-1 Implementation of the proposed General Plan would convert Important Farmland to nonagricultural uses.

6.3-4 Implementation of the proposed General Plan, in combination with other development in the region could convert Important Farmland to nonagricultural uses.

6.4-1 Implementation of the proposed General Plan could conflict with or obstruct implementation of an applicable air quality management plan.

6.4-2 Implementation of the proposed General Plan would result in operational emissions that would contribute substantially to an existing or projected air quality violation.
6.4-3 Implementation of the proposed General Plan would result in construction emissions that would contribute substantially to an existing or projected air quality violation.

6.4-7 Cumulative growth within the SVAB, in conjunction with the proposed General Plan, would not be consistent with current growth projections and would result in inconsistencies with local air quality management plans.

6.4-8 Implementation of the proposed General Plan, in conjunction with other development within the SVAB, would increase cumulative operational emissions above FRAQMD-established thresholds.

6.4-9 Implementation of the proposed General Plan, in conjunction with other construction activities in the SVAB, would increase cumulative construction-generated emissions above FRAQMD-established thresholds.

6.7-1 Implementation of the proposed General Plan could cause a substantial adverse change in the significance of a historical resource.

6.11-1 Implementation of the proposed General Plan would result in an increase in exterior noise levels.

6.11-2 Implementation of the proposed General Plan would result in increases to exterior noise levels associated with traffic noise, per FTA standards.

6.11-3 Implementation of the proposed General Plan would result in an increase in interior noise levels.

6.11-5 Implementation of the proposed General Plan would result in substantial vibration impacts from construction activity in the policy area.

6.11-7 Implementation of the proposed General Plan would increase the noise and vibration levels in the policy area, which, along with noise and vibration sources from other development in the region, could result in an increase in cumulative interior and exterior noise levels.

6.14-2 Implementation of the proposed General Plan could result in a deterioration in LOS on roadway segments located in adjacent jurisdictions.

6.14-3 Implementation of the proposed General Plan could increase traffic volumes on Caltrans facilities that serve the unincorporated county.
Alternatives Considered and Dismissed from Further Consideration

Consistent with the CEQA Guidelines, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project, or that would not meet most of the project objectives, were rejected from further consideration. The significant impacts identified for the proposed project are related to permanent loss of agricultural resources, air emissions contributing to potential air quality violations, change in historic resources, increase in interior and exterior noise levels at existing residences, increased vibration levels associated with construction activities, decrease in the level of service for traffic, and an increase in traffic volumes. Alternatives that would exceed the significance thresholds for the aforementioned issue areas would not substantially lessen any significant environmental impacts identified in Chapter 6 of this Draft EIR and were rejected from further analysis. The following alternatives were considered, but rejected from further analysis because they were determined to be infeasible.

New Growth - Lower Intensity

This alternative would have provided for a moderate increase in new growth beyond the existing 1996 General Plan. When compared to development under the existing 1996 General Plan, this alternative includes:

- More land designated for urban uses, specifically commercial, estate residential, and industrial/commercial reserve uses, with less agricultural land and the elimination of the FPARC land use designation.
- Proposed future expansion of the city of Yuba City Sphere of Influence (SOI).
- 50 percent buildout of new industrial/commercial reserve uses located north and south of the Yuba City SOI, and in the communities of East Nicolaus and Trowbridge.
- 50% buildout of a new Rural Planned Community in the Community of Sutter comprised of residential, industrial, commercial, and open space uses.
- New Estate Residential use south of Yuba City and west of Highway 99.
- A reduction of industrial acreage in the community of Robbins. Land designated for industrial uses that is currently vacant is reverted to AG 80.

This alternative also includes changes to the minimum parcel sizes for some agricultural lands. Specifically, agricultural lands with current 20-acre minimum parcel sizes (AG 20) would be increased to 40-acre minimum parcel sizes (AG 40) in areas north and south of the Community of Meridian, and a small area west of the Community of Sutter. In general, the remaining AG 20 designations in the County, as well as existing agricultural lands with 80-acre minimum parcel sizes (AG 80), are not changed.
This alternative was considered to be infeasible because it would not have fully met the County’s goals for development within the county. The cost of constructing new utilities infrastructure compared to a relatively moderate level of growth countywide could result in a difficult financial situation for the County because there may not be enough developer fees collected to fully fund the infrastructure investment. In addition, there is potential for urban sprawl under this alternative, which could threaten the county’s existing agricultural and biological resources and induce growth in other areas of the county. Therefore, this alternative was rejected from further consideration.

Higher Intensity Growth

This alternative provides for new growth beyond the existing 1996 General Plan, but at a higher intensity than the New Growth - Lower Intensity alternative discussed above. When compared to the New Growth - Lower Intensity alternative, this alternative includes:

- A reorganization of commercial and industrial uses within the Live Oak sphere of influence consistent with the City’s ongoing General Plan update.
- 100% (versus 50%) buildout of the new industrial/commercial reserve uses located north and south of the Yuba City SOI, and in the communities of East Nicolaus and Trowbridge.
- 100% (versus 50%) buildout of the Rural Planned Community in the Community of Sutter.
- Approximately 50% more new Estate Residential use south of Yuba City and west of Highway 99.
- No reduction in existing industrial designated land within the community of Robbins.

Like the New Growth - Lower Intensity alternative, this alternative also includes the possible future expansion of the Yuba City sphere of influence and an increase in the minimum parcel sizes from 20-acres to 40-acres for agricultural lands in areas north and south of the community of Meridian, and a small area west of the community of Sutter.

This alternative was considered to be infeasible because it results in the highest demand for utility services and infrastructure (water, sewer, and storm drainage). Development of this alternative would require extensive upgrades to existing infrastructure systems and the creation of new systems. In order for a city to provide public services and infrastructure, the development must be located within its boundaries. Thus, new developments must be annexed into the cities before they can receive city services. As new development occurs farther away from the incorporated cities, it becomes less efficient to serve. This alternative would also expose many county residents to increased flood risk. This alternative would also result in the permanent conversion of approximately 12,780 acres of Important Farmland, the highest number of acres of any alternative considered, including the proposed General Plan. Therefore, this alternative was rejected from further consideration.
8.0 Project Alternatives

Alternatives To The Proposed Project

The Draft EIR analyzes the following alternatives to the proposed General Plan:

**Alternative 1: No Project/2015 General Plan** - Under this alternative, development proposed as part of the draft Sutter County General Plan would not occur. Development within the county would continue to be guided by implementation of the existing goals, policies, land use diagram, and mobility diagram included in the 1996 General Plan (adopted in 1996 and most recently amended on December 19, 2006).

**Alternative 2: FPARC Redesignated** - Under this alternative, development would be consistent with the proposed Sutter County General Plan with the exception of the 1,817 acres currently designed as Food Processing, Agricultural and Recreational Combining District (FPARC) near the community of Sutter. This area would be redesignated to Agricultural 80-acre minimum (AG-80).

**Alternative 3: Reduction in Industrial and Commercial Land** - This alternative would reduce the amount of land designated for Industrial and Commercial (I/C) uses as well as land designated for future Employment Corridor (EC) by 50 percent. The development assumptions for the Sutter Point Specific Plan would stay the same since this is an approved project in the county. The number of jobs would also be reduced to accommodate this reduction in employment-generating uses. The total number of jobs would be 25,612 under the adjusted buildout and 75,854 under the full buildout scenario.

Each of the alternatives is described in more detail below, followed by an assessment of the alternative’s impacts relative to the proposed project. The focus of this analysis is the difference between the alternative and the proposed project, with an emphasis on addressing the significant impacts identified under the proposed project. For each issue area, the analysis indicates which mitigation measures would be required of the alternative and which significant and unavoidable impacts would be avoided. If necessary, the analysis indicates what additional mitigation measures, would be required for the alternative being discussed, and what significant impacts would be less (or more) severe. Unless otherwise indicated, the level of significance and required mitigation would be the same for the alternative as for the proposed project and no further statement of the level of significance is made. Table 8-5 at the end of this chapter provides a summary comparison of the severity of impacts for each alternative by topic.

**Alternative 1: No Project/2015 General Plan**

Under CEQA, the No Project Alternative must consider the effects of forgoing the project. The purpose of analyzing the No Project Alternative is to allow decision-makers to compare
the impacts of the proposed project versus no project. The No Project Alternative can consist of either a No Development Alternative, in which no development occurs in the project area, or an Existing Designation or General Plan Alternative, in which development is assumed to occur consistent with the existing goals, policies, and land use designations.

The No Project/No Development Alternative describes the environmental conditions that exist at the time that the environmental analysis commences (CEQA Guidelines, section 15126.6 (e) (2)). This alternative would halt all development within the county, regardless of the status of entitlements. By stopping all future development, this alternative would reduce the demand for public infrastructure and services, reduce impacts on environmental resources, such as air quality, noise, biological, and cultural resources, and dramatically reduce traffic impacts relative to the proposed project as well as the contribution to greenhouse gas (GHG) emissions. However, while a No Development Alternative could be an option for an individual development project, eliminating all future development in the entire county would not be a realistic alternative for this project. Therefore, the No Project/No Development Alternative is not analyzed, but the No Project/Existing Designation Alternative or 2015 General Plan is addressed and discussed below.

This Draft EIR analyzes the No Project alternative that assumes development would occur consistent with the existing land use designations in the county, or those of the existing 2015 General Plan. Under the No Project/2015 General Plan Alternative, the policy area would be developed consistent with currently allowable land uses and development intensities. It is assumed that the existing General Plan goals, policies, land use and mobility diagrams, and implementation programs would remain in place under this alternative. Development under this alternative would result in more rural development, with residential units and employment sources located further away from planned communities. Under the Existing 2015 General Plan more land would be designated for agricultural (AG-20 and AG-80) as well as industrial/employment, ranchette and low density residential, compared to the proposed General Plan land uses. There would be no areas set aside for Industrial/Commercial or Employment Corridor development under this alternative.

**Comparative Environmental Effects**

Under this alternative, it is assumed no new land use designations would be created. Current land use densities and intensities would remain and typical low-density, rural development would continue to occur within the county. While development in the existing rural planned communities would continue to occur, growth and development patterns would not be as dense as under the proposed General Plan. Growth would be permitted to occur in a less organized manner, with the development of ranchettes and low-density residential occurring in areas away from community centers or the incorporated cities. The amount of land designated for open space would essentially be the same between the existing General Plan (44,426 acres) and the proposed General Plan (44,035
acres). The acreage designated for residential development is more under the existing General Plan, approximately 6,600 acres compared to 4,300 under the proposed General Plan. The amount of land designated for commercial/industrial development is less under the existing General Plan. A total of approximately 1,706 acres is designated for commercial and industrial/employment uses under the existing General Plan compared to 2,439 acres under the proposed General Plan. This does not include the industrial and commercial land uses within the Sutter Pointe Specific Plan.

Because this alternative would not include substantial commercial and industrial development, it can be assumed that this alternative would result in fewer acres developed than the proposed General Plan. Therefore, impacts related to building ‘footprints’, including loss of agricultural resources, biological resources, and cultural resources, and the potential for hazards related to a specific location (e.g., flooding and existing hazardous materials), would be less severe under this alternative. However, impacts to the resources listed above would also be significant and unavoidable, like the proposed project, even with implementation of mitigation identified for the proposed project.

Development associated with the No Project/2015 General Plan Alternative would generate the primary ozone precursors, reactive organic gases (ROG) and oxides of nitrogen (NOₓ), in addition to emissions of these pollutants from existing land uses. The Sacramento Valley Air Basin, in which the county is located, is in non-attainment for ozone precursors, so the emissions from future development under the proposed General Plan was found to result in a significant and unavoidable impact. Because the No Project/2015 General Plan Alternative would result in less commercial/industrial development (which generates higher emissions than residential uses) than the proposed General Plan, emissions from future development in Sutter County would be less and would, thus, conceivably be less severe than the proposed General Plan. However, development under the No Project/2015 General Plan Alternative proposes lower density residential uses across the county, with little focus on clustering residential uses in existing rural planned communities or near incorporated cities. This could result in air emissions equal to or greater than those under the proposed General Plan if vehicle trips are increased as residents travel greater distances between their homes and areas of employment. It is assumed under this alternative that the contribution to greenhouse gas emissions (GHG) emissions would be roughly the same as the project. It is not anticipated that under this alternative the amount of carbon dioxide would be less relative to the proposed project due to an increase in vehicle trips associated with a rural, low-density land use pattern as well as the potential increase in more vehicle trips from people traveling outside of the county to access employment centers.

Development under the No Project/2015 General Plan Alternative would result in the addition of new structures and infrastructure throughout the county that could potentially
be exposed to the effects of geological hazards associated with unstable soil conditions, such as expansive soils and subsidence. Like with the proposed General Plan, adherence to the California Building Code (CBC) and county policies would ensure the maximum practicable protection available for users of buildings and infrastructure. Like the proposed project, this would be a less-than-significant impact.

This alternative would require land-disturbing construction activities, such as grading, excavation, and trenching, which could result in the potential for soil erosion and sedimentation in runoff. Development under this alternative would increase stormwater and non-stormwater runoff entering local streams, the Sacramento, Feather, and Bear rivers, and the Sutter Bypass. Existing areas of vegetated pervious ground-cover could be converted to impervious surfaces that would increase the rate of stormwater runoff. These actions could negatively affect water quality. Any development under this alternative would be required to comply with requirements in applicable permits and regulations, such as the National Pollutant Discharge Elimination System (NPDES) Permit. Therefore, this impact would be similar to that of the proposed project and would be less than significant and possibly less severe.

The No Project/2015 General Plan Alternative would increase the population in the county compared to what is assumed under the proposed General Plan because more residential areas are designated, thereby increasing demand for public services, such as police, fire, schools, and emergency services. The county currently requires payment of development fees into a community services district to finance required services to ensure adequate service levels are provided. The revenues from development associated with this alternative would continue to be used for services and would ensure adequate levels of service are provided for new development. This would be a less-than-significant impact, the same as the project.

The No Project/2015 General Plan Alternative would result in an increase in population compared to the proposed General Plan, but a decrease in commercial and industrial uses. Therefore, the demand for increased water and energy, wastewater and solid waste generation, and other utilities for this alternative would be similar to the proposed project. Due to the rural nature of the county, property owners typically provide their own wells or septic systems instead of hooking into a publicly managed infrastructure system. Since future development under this alternative would generally not be concentrated around existing developed areas and large development projects would not be required to hook into an existing infrastructure system, delivery of these services would be widespread and less localized. Due to this pattern of development there would be less of an opportunity to develop public infrastructure in the county and public utilities would continue to be provided in the same manner. Therefore, this alternative would result in a similar level of demand relative to the project.
The No Project/2015 General Plan Alternative would result in an increase in population compared to the proposed General Plan, therefore, it could also potentially result in more vehicle trips associated with people commuting to areas outside of the county to employment centers within adjacent areas, potentially resulting in an increase in vehicle miles traveled per person. The No Project/2015 General Plan Alternative does not emphasize the use of alternative transportation modes including transit, pedestrian, and bicycle travel when compared to the proposed General Plan. The proposed General Plan would yield significant impacts (LOS E or F) on two roadway segments, under full buildout conditions, compared to the No Project/2015 General Plan which would yield LOS E or F conditions on seven segments. As the 2015 General Plan does not propose to widen these facilities, the No Project/2015 General Plan Alternative would not alleviate impacts on these roadway segments. The No Project/2015 General Plan Alternative does not emphasize or promote alternative forms of transportation therefore under this alternative it is anticipated that the LOS on several roadway segments would not improve. Therefore, traffic impacts would remain significant and unavoidable under this alternative, the same as the project.

Noise levels along several roadway segments would be greater under the No Project/2015 General Plan than under the proposed General Plan under full buildout conditions. Interior noise levels within many existing residential structures would exceed the daily average acceptable interior levels. Interior noise levels for institutional land uses would exceed hourly average acceptable levels. Interior noise levels within existing noise-sensitive uses that are located in areas influenced by flight operations from area airports or along busy rail or truck routes are likely to exceed the limits on single-event levels. The increase in noise levels along several roadway segments would be greater under the No Project/2015 General Plan Alternative because there would likely be more people commuting to areas outside of the county. Therefore, noise impacts to existing residential areas could be slightly greater than under the proposed General Plan.

This alternative would not include dense development around rural communities that would be developed under the proposed General Plan. While the aesthetic impact of the proposed General Plan was found to be less than significant, because a large portion of land would be left in its natural state under this alternative, the impact would be less severe than that of the proposed General Plan because overall slightly less land would be developed.

**Mitigation That Would No Longer Be Required**

The No Project/2015 General Plan Alternative proposes more low-density residential development and less commercial and industrial development than the proposed General Plan, but essentially a similar amount of land is designated for future development under both scenarios. Therefore, it is anticipated that all of the mitigation measures identified for the proposed General Plan would still be required for this alternative.
Significant and Unavoidable Impacts That Would No Longer Occur

The No Project/2015 General Plan Alternative would involve development of a substantial amount of land. While some impacts associated with this alternative could be reduced compared to the proposed General Plan, none of the significant and unavoidable impacts would be reduced to a level that would be considered less than significant.

Relationship of the No Project/2015 General Plan Alternative to the Project Objectives

This alternative would be a continuation of the type and intensity of development included in the 2015 General Plan. The result would be a continued expansion of rural residential development in the county, in areas discontiguous from incorporated cities and established communities. There would be little focus on development within existing communities and no emphasis on establishing long-term infrastructure to support the new development. Ranchettes and low-density residential uses would continue to develop on agricultural land, further segmenting productive agricultural land in the county. This type of low-density growth is inefficient from a planning perspective and would not be considered completely consistent with the objective to ensure managed and efficient growth. Without managing this future growth, the objective to maintain a viable agricultural industry by sustaining existing agricultural operations would be threatened because development would be allowed to occur in a less logical manner, allowing the possibility of agricultural land to be converted to urban uses. In addition, without structured growth in the county occurring within designated communities, it would be unlikely that the county could adequately provide services and utility infrastructure to potential future new users. This alternative, therefore, would be generally inconsistent with the project objectives.

Alternative 2: FPARC Redesignated

Under this alternative, the proposed land use designations would be consistent with the draft Sutter County General Plan with the exception of the 1,817 acres currently designed as FPARC near the community of Sutter. This area would be redesignated to Agricultural 80-acre minimum (AG-80).

This alternative would result in 20,000 square feet (sf) less commercial space and 272,661 sf less industrial space than under the proposed adjusted buildout scenario, as shown in Table 8-1. Under the full buildout scenario, Alternative 2 would have 20,000 sf less commercial space and 692,604 sf less of industrial space, as shown in Table 8-2. The number of jobs countywide would also decrease from 30,565 to 30,275 under adjusted buildout conditions, and from 89,077 to 88,406 under full buildout conditions.
TABLE 8-1
ALTERNATIVE 2 - FPARC REDESIGNATION TO AG-80
SUTTER COUNTY GENERAL PLAN ADJUSTED BUILDOUT GROWTH ASSUMPTIONS

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Notes:
2. Sutter County, Sutter Pointe Specific Plan Draft EIR, December 2008. This project was approved by the Board of Supervisors on June 30, 2009. The project is not yet constructed. These figures represent buildout of Phase 1 and Phase A as described in the Sutter Pointe Specific Plan Draft EIR.
3. Does not include Sutter Pointe Specific Plan.
4. The 2030 Sutter County General Plan only includes growth assumptions for the unincorporated county. Due to current market conditions and growth projections for the region, the County used density/intensity assumptions for new growth that are expected to occur within the timeframe of the General Plan, reflecting a foreseeable/adjusted buildout scenario.
5. Includes the following low density residential uses: AG-20, AG-40, AG-80, AG-RC, AP/APR, RAN, ER, and LDR.
6. No existing units would be lost, but approximately 78 acres currently designated as medium density residential would be redesignated as other uses.
9. Assumes the following: Commercial uses have a split of 0.80 Retail with 1 employee per 500 sf, 0.20 Office with 1 employee per 400 sf; Industrial uses have a split of 0.60 Heavy Industrial with 1 employee per 1,000 sf, 0.40 Light Industrial with 1 employee per 1,300 sf.
10. Uses consist of commercial, office, and civic uses.
Since Alternative 2 would redesignate land to AG-80 from FPARC, the AG-80 acreage in the county would increase from 242,476 acres to 244,293 acres under both the adjusted buildout and full buildout conditions.

## Comparative Environmental Effects

Under this alternative, it is assumed the land uses proposed under the draft Sutter County General Plan would remain the same with the exception of the 1,817-acre area designated as FPARC. This land use designation would be removed and replaced with AG-80. The removal of the FPARC designation would also eliminate 20,000 sf in commercial space and
272,661 sf in industrial uses. Therefore, impacts associated with the remainder of the county would be the same as discussed in Sections 6.2 through 6.14 in this Draft EIR for the proposed General Plan. Specifically, impacts to aesthetics and visual resources, biological resources, geology, seismicity and mineral resources, hazards and hazardous materials, hydrology, flooding and water quality, and public services and utilities would remain less than significant the same as the project.

Impacts associated with development in this area including impacts associated with the loss of Important Farmland would be slightly less severe under this alternative because over a thousand acres would remain in agricultural use. However, the impact would remain significant and unavoidable. The same is true for impacts to air quality associated with both project construction and operation (e.g., vehicle trips). Overall, the severity of the impacts would be reduced compared to the project, but the impacts would remain significant and unavoidable. Mitigation associated with the Climate Action Plan (Mitigation Measure 6.6-1) would still be required under this alternative, the same as the project.

The potential disturbance to historical resources would be reduced compared to the project because over a thousand acres would not be disturbed; however, the impact to cultural resources would remain significant and unavoidable.

Under this alternative the number of vehicle trips would be reduced because less commercial and industrial land would be developed. Therefore, traffic noise associated with new development would be reduced under this alternative. However, the increase in exterior and interior noise that exceeds current standards would still remain significant and unavoidable under this alternative.

In terms of traffic, the amount of traffic would be slightly reduced compared to the project because the additional commercial and industrial land would not be developed. However, because this only amounts to a small amount relative to the overall amount of commercial and industrial land uses that are designated in the remainder of the county traffic volumes would be slightly decreased but not enough to avoid creating significant and unavoidable impacts on roadway segments both within as well as on roadways outside of the County’s jurisdiction.

**Mitigation That Would No Longer Be Required**

All the mitigation measures identified for the proposed General Plan would still be required for this alternative. Specifically, Mitigation Measure 6.6-1.

**Significant and Unavoidable Impacts That Would No Longer Occur**

All of the significant and unavoidable impacts identified for the proposed General Plan would occur under this alternative. The significance of the impacts would be slightly
reduced, but not enough to eliminate the impact. No new significant and unavoidable impacts or, increase in severity of an identified impact would occur under this alternative.

**Relationship of the FPARC Redesignated Alternative to the Project Objectives**

Overall, this alternative is similar to the proposed project with the only exception being the redesignation of FPARC. Therefore, under this alternative a majority of the project objectives would generally be met the same as the project.

**Alternative 3: Reduction in Industrial and Commercial Land**

Under Alternative 3, Reduction in Industrial and Commercial Land, the amount of land designated for Industrial and Commercial (I/C) uses, as well as land designated for future Employment Corridor (EC) would be reduced by 50 percent. The development assumptions for the Sutter Point Specific Plan would stay the same since this is an approved project in the county. The number of jobs would also be reduced to accommodate this reduction in employment-generating uses. The total number of jobs would be reduced to 25,612 under the adjusted buildout scenario and 75,854 under full buildout conditions, as shown in Tables 8-3 and 8-4. Because the acreage of I/C and EC uses would be reduced by 50 percent, that acreage, approximately 1,220 acres, would remain in agriculture.

**Comparative Environmental Effects**

Under this alternative, it is assumed the land uses proposed under the draft Sutter County General Plan would essentially remain the same with the exception of reducing the amount of land designated for commercial and industrial development by 50 percent. The reduction in commercial and industrial land uses would retain approximately 1,200 acres in agricultural use and would generate fewer vehicle trips and less air emissions and noise. Impacts associated with development within the county under this alternative would essentially be the same as discussed in Sections 6.2 through 6.14 in this Draft EIR for the proposed General Plan. Specifically, impacts to aesthetics and visual resources, biological resources, geology, seismicity and mineral resources, hazards and hazardous materials, hydrology, flooding and water quality, and public services and utilities would remain less than significant the same as the project.

Impacts associated with the loss of Important Farmland would be slightly less severe under this alternative because over a thousand acres would remain in agricultural use and would not be developed. However, the impact would still remain significant and unavoidable the same as the project because a significant amount of Prime Farmland would be removed to accommodate future development. The same is true for impacts to air quality associated with both project construction and operation (e.g., vehicle trips, vibration). Overall, the severity of the impacts would be reduced compared to the project, but the impacts would...
remain significant and unavoidable due to the amount of development that could occur. Mitigation associated with ensuring the Climate Action Plan (Mitigation Measure 6.6-1) covered the time period between 2020 and 2030 would still be required under this alternative, the same as the project.

The potential disturbance to historical resources would be reduced compared to the project because over a thousand acres would not be disturbed; however, the impact to cultural resources would remain significant and unavoidable due to the amount of proposed development.

### TABLE 8-3

<table>
<thead>
<tr>
<th>ALTERNATIVE 3 - REDUCTION IN INDUSTRIAL AND COMMERCIAL LAND</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUTTER COUNTY GENERAL PLAN ADJUSTED BUILDOUT GROWTH ASSUMPTIONS</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>Residential Units</td>
</tr>
<tr>
<td>Low Density</td>
</tr>
<tr>
<td>Medium Density</td>
</tr>
<tr>
<td>High Density</td>
</tr>
<tr>
<td><strong>Total Units</strong></td>
</tr>
<tr>
<td>Population</td>
</tr>
<tr>
<td>Jobs</td>
</tr>
<tr>
<td>Commercial Uses (sf)</td>
</tr>
<tr>
<td>Industrial Uses (sf)</td>
</tr>
<tr>
<td>Mixed Use10</td>
</tr>
</tbody>
</table>

Notes:
2. Sutter County, Sutter Pointe Specific Plan Draft EIR, December 2008. This project was approved by the Board of Supervisors on June 30, 2009. The project is not yet constructed. These figures represent buildout of Phase 1 and Phase A as described in the Sutter Pointe Specific Plan Draft EIR.
3. Does not include Sutter Pointe Specific Plan.
4. The 2030 Sutter County General Plan only includes growth assumptions for the unincorporated county. Due to current market conditions and growth projections for the region, the County used density/intensity assumptions for new growth that are expected to occur within the timeframe of the General Plan, reflecting a foreseeable/adjusted buildout scenario.
5. Includes the following low density residential uses: AG-20, AG-40, AG-80, AG-RC, AP/APR, RAN, ER, and LDR.
6. No existing units would be lost, but approximately 78 acres currently designated as medium density residential would be redesignated as other uses.
9. Assumes the following: Commercial uses have a split of 0.80 Retail with 1 employee per 500 sf, 0.20 Office with 1 employee per 400 sf; Industrial uses have a split of 0.60 Heavy Industrial with 1 employee per 1,000 sf, 0.40 Light Industrial with 1 employee per 1,300 sf.
10. Uses consist of commercial, office, and civic uses.
Under this alternative, the number of vehicle trips would be reduced because less commercial and industrial land would be developed. The total trip generation decreases by approximately 9.1 percent. Under the project a total of 426,913 vehicle trips would occur. Under this alternative approximately 388,099 vehicle trips would occur, a 38,814 reduction compared to the proposed project. However, because this is a small amount relative to the overall amount of commercial and industrial land uses that are designated in the remainder of the county traffic volumes would be slightly decreased, but not enough to avoid creating significant and unavoidable impacts on roadway segments both within as well as on roadways outside of the County’s jurisdiction.
Therefore, traffic noise associated with new development would be reduced under this alternative. However, the increase in exterior and interior noise that exceeds current standards would still remain significant and unavoidable under this alternative because the amount of the reduction would not be enough to make a significant difference in traffic noise.

**Mitigation that Would No Longer be Required**

All the mitigation measures identified for the proposed General Plan would still be required for this alternative. Specifically, Mitigation Measure 6.6-1.

**Significant and Unavoidable Impacts that Would No Longer Occur**

All of the significant and unavoidable impacts identified for the proposed General Plan would still occur under this alternative. The significance of the impacts would be slightly reduced, but not enough to eliminate the impact. No new significant and unavoidable impacts or increase in severity of an identified impact would occur under this alternative.

**Relationship of the Reduction in Industrial and Commercial Land Alternative to the Project Objectives**

Under this alternative the project objectives would be met, essentially the same as the project. Under this alternative a high quality, rural lifestyle would still be met along with providing a safe place to live and protecting natural resources. The ability to support a vibrant and sustainable economy would not be compromised by reducing the amount of industrial and commercial land and growth would still be managed. Therefore, the intent of the project objectives would essentially be met under this alternative the same as the project.

**Environmentally Superior Alternative**

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. For each subject area, Table 8-5, at the end of this chapter, indicates whether the impacts of the project alternatives are more or less severe than those of the proposed project.

From the alternatives evaluated for the project, the environmentally superior alternative would be Alternative 3, Reduction in Industrial and Commercial Land.
While Alternatives 2 and 3 are very similar and would essentially meet most of the project objectives, Alternative 3 would reduce more industrial and commercial land resulting in an overall smaller building footprint that would correspondingly reduce the severity of any impacts. Alternative 3 also meets the intent of most of the project objectives. Therefore, Alternative 3 would be the environmentally superior alternative for this project.
### TABLE 8-5

**COMPARISON OF SIGNIFICANT IMPACTS BY ALTERNATIVE**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>Alternative 1 No Project/2015 General Plan</th>
<th>Alternative 2 FPARC Redesignated</th>
<th>Alternative 3 Reduction in Industrial and Commercial Land</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6.2 Aesthetics and Visual Resources</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td><strong>6.3 Agricultural Resources</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.3-1 Implementation of the proposed General Plan would convert Important Farmland to nonagricultural uses.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.3-4 Implementation of the proposed General Plan, in combination with other development in the region could convert Important Farmland to nonagricultural uses.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td><strong>6.4 Air Quality</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.4-1 Implementation of the proposed General Plan could conflict with or obstruct implementation of an applicable air quality management plan.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.4-2 Implementation of the proposed General Plan would result in operational emissions that would contribute substantially to an existing or projected air quality violation.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.4-3 Implementation of the proposed General Plan would result in construction emissions that would contribute substantially to an existing or projected air quality violation.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.4-7 Cumulative growth within the SVAB, in conjunction with the proposed General Plan, would not be consistent with current growth projections and would result in inconsistencies with local air quality management plans.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.4-8 Implementation of the proposed General Plan, in conjunction with other development within the SVAB, would increase cumulative operational emissions above FRAQMD-established thresholds.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
</tbody>
</table>

**Notes:**
1. Applies to the policy area (Sutter County) unless otherwise indicated

LS/M = Impacts less than significant after mitigation
SU = Impacts significant and unavoidable
SU/M = Impacts significant even with mitigation
NI = No impact

“+” indicates the impact is more severe than the project impact
No “+” or “-” indicates the impact would be similar to the project impact

“-” indicates that the impact is similar to the project impact but less severe

Sutter County General Plan
### TABLE 8-5

**COMPARISON OF SIGNIFICANT IMPACTS BY ALTERNATIVE**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.4-9 Implementation of the proposed General Plan, in conjunction with other construction activities in the SVAB, would increase cumulative construction-generated emissions above FRAQMD-established thresholds.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.5 Biological Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td>6.6 Climate Change</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of the proposed General Plan could generate greenhouse gases that would either directly or indirectly have a significant impact on the environment.</td>
<td>LS/M</td>
<td>LS/M-</td>
<td>LS/M-</td>
<td>LS/M-</td>
</tr>
<tr>
<td>6.7 Cultural Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of the proposed General Plan could cause a substantial adverse change in the significance of a historical resource.</td>
<td>SU/M</td>
<td>SU/M-</td>
<td>SU/M-</td>
<td>SU/M-</td>
</tr>
<tr>
<td>6.8 Geology, Seismicity, and Mineral Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td>6.9 Hazards and Hazardous Materials</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td>6.10 Hydrology, Flooding, and Water Quality</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td>6.11 Noise</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of the proposed General Plan would result in an increase in exterior noise levels.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
</tbody>
</table>

**Notes:**
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6. "+" indicates the impact is more severe than the project impact
7. "-" indicates that the impact is similar to the project impact but less severe
8. No "+" or "-" indicates the impact would be similar to the project impact
### TABLE 8-5

**COMPARISON OF SIGNIFICANT IMPACTS BY ALTERNATIVE**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Proposed Project</th>
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<th>Alternative 2 FPARC Redesignated</th>
<th>Alternative 3 Reduction in Industrial and Commercial Land</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.11-2 Implementation of the proposed General Plan would result in increases to exterior noise levels associated with traffic noise, per FTA standards.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.11-3 Implementation of the proposed General Plan would result in an increase in interior noise levels.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.11-5 Implementation of the proposed General Plan would result in substantial vibration impacts from construction activity in the policy area.</td>
<td>SU</td>
<td>SU-</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.11-7 Implementation of the proposed General Plan would increase the noise and vibration levels in the policy area, which, along with noise and vibration sources from other development in the region, could result in an increase in cumulative interior and exterior noise levels.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td><strong>6.12 Public Services</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td><strong>6.13 Public Utilities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts were identified.</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
<td>LS</td>
</tr>
<tr>
<td><strong>6.14 Transportation and Circulation</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.14-2 Implementation of the proposed General Plan could result in a deterioration in LOS on roadway segments located in adjacent jurisdictions.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
<tr>
<td>6.14-3 Implementation of the proposed General Plan could increase traffic volumes on Caltrans facilities that serve the unincorporated county.</td>
<td>SU</td>
<td>SU+</td>
<td>SU-</td>
<td>SU-</td>
</tr>
</tbody>
</table>

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