

VI. ALTERNATIVES ANALYSIS

A. INTRODUCTION

The California Environmental Quality Act (CEQA), Section 15126 (a), requires an EIR to describe a reasonable range of alternatives to a project, or to the location of a project, which could 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. This chapter discusses a range of alternatives to the proposed project including, the No Project Alternative, Reduced Density Alternative, Single Cluster Alternative, Effluent Disposal Alternative, Alternative Project Location, and Mitigated Project Alternative.

Criteria used to evaluate the range of alternatives and remove certain alternatives from further consideration are addressed. CEQA *Guidelines* Section 15126.6 provides direction for the discussion of alternatives to the proposed project. This chapter requires:

- Description of “...a range of reasonable alternatives to the project, or to the location of a 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.” [Section 15126.6(a)]
- A setting forth of alternatives that “...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.” [Section 15126.6(f)]
- Discussion of the "No Project" alternative, and “...If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” [Section 15126.6(e)(2)]
- Discussion and analysis of alternative locations “Only locations that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.” [Section 15126.6(f)(2)(A)]

Given the CEQA mandates listed above, this chapter (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and (3) identifies the Environmentally Superior Alternative.

B. ALTERNATIVES SELECTION

An alternative screening analysis was implemented as part of the EIR analysis in order to limit the number of alternatives evaluated in detail. The use of an alternative screening analysis provides the detailed explanation of why some of the alternatives were rejected from further analysis and assures that only the environmentally preferred alternatives are evaluated and compared in the EIR. In addition, this screening analysis uses the “rule of reason” methodology

as discussed in CEQA (*Guidelines* Section 15126.6(f)) that requires that EIRs address a range of only those feasible alternatives that are necessary to permit a reasoned choice. In defining feasibility of alternatives the CEQA *Guidelines* state: “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” (Section 15126.6(f)(1)). Through the scoping process, if an alternative was found to be infeasible, as defined above, then it was dropped from further consideration. In addition, CEQA states that alternatives should “...attain most of the basic objectives of the project...” (Section 15126.6(a)). If an alternative was found to not obtain most of the basic objectives of the proposed project, then it was also eliminated.

The basic objectives of the proposed project that were used in the screening of project alternatives included those that were identified by the project applicant and the County of San Luis Obispo. The applicant’s stated objective is to use the incentives of the Agricultural Cluster Ordinance combined with estate planning to enable future generations of the landowner’s families to continue to farm the project site as an economic unit by creating an economically feasible and successful cluster project through a three-phased development that would include the following provisions:

- Preclude future residential development within designated agricultural/open space easements;
- Protect the existing rural character by placing 95 percent of the property within the Agricultural land use category and 90 percent of the property within the Rural Lands land use category in permanent agricultural/open space easements;
- Provide for the expansion of the existing winery operations and continuation of the vineyard operation;
- Create places to live and enjoy in a scenic rural setting;
- Create a financially feasible project; and,
- Enhance long-term agriculture viability.

Implementation of the proposed project would result in significant and unavoidable environmental effects to biological resources, agricultural resources, archaeological resources, air quality, and aesthetic resources. Significant and unavoidable transportation and circulation, noise, hazards and hazardous materials, and public services and utilities effects would also occur (refer to Table VI-1). The alternatives evaluated include those that would reduce, to the maximum extent feasible, the identified unavoidable impacts that cannot be mitigated to less than significant (Class I).

**TABLE VI-1
Class I Impacts**

| Impact No. | Description |
|---------------------------------------|---|
| BIOLOGICAL RESOURCES | |
| BIO Impact 3 | Development of the proposed project would result in the removal of and/or impacts to an estimated 300 coast live oak trees that are greater than five inches DBH, as well as impacts to approximately 14.35 acres of native oak woodland habitat. In accordance with Kuehl Bill mitigation techniques, half of the estimated oak trees that are removed or impacts can be replaced, but due to the long time period required for the planted trees to develop equivalent oak woodland habitat values, and the fact there is no assurance that oak trees within lot boundaries would be protected in the future, impacts to oak trees and oak woodlands are significant and unavoidable. |
| BIO Impact 7 | The proposed project would result in a decrease in water quality and quantity within Los Berros Creek and steelhead critical habitat. |
| ARCHAEOLOGICAL RESOURCES | |
| AR Impact 1 | Implementation of the proposed project would directly impact known, significant archaeological sites SLO 2526 and SLO-2528. Grading and trenching activities associated with the implementation of proposed vineyard replacement areas may result in the disturbance of known, significant, subsurface archaeological materials within sites SLO-1317 and SLO-2522. |
| AR Impact 9 | Proposed grading and construction activities would result in the direct disturbance and destruction of significant archaeological sites, which would contribute to the loss of intact archaeological resources in the South County area, resulting in a significant and unavoidable cumulative impact. |
| AGRICULTURAL RESOURCES | |
| AG Impact 1 | Implementation of the proposed project would result in the permanent loss of 12.5 acres of Farmland of Statewide Importance, 3.0 acres of Farmland of Local Importance, 153 acres of Unique Farmland, including 113 acres of productive vineyard, and 61.9 acres of Grazing Land. Implementation of the proposed project would set an adverse precedent in the county by resulting in the permanent conversion and loss of 113 acres of existing productive vineyard. |
| AG Impact 2 | The non-contiguous nature of the proposed project and inadequate buffers between the existing agricultural use and proposed residential use and access roads would create land use conflicts, which would compromise the productivity of the existing agricultural operation. |
| AG Impact 4 | Implementation of the proposed project would significantly contribute to the cumulative loss of productive Farmland. |
| TRANSPORTATION AND CIRCULATION | |
| TR Impact 3 | The proposed project would add traffic to southbound Highway 101 during the p.m. peak hour and exacerbate an existing deficient condition according to Caltrans standards. Congestion under LOS D conditions would be limited. The proposed project would exacerbate existing deficient conditions at the Highway 101/Los Berros Road/North Thompson Road ramp junctions during the p.m. peak hour. |
| TR Impact 9 | The proposed control of the emergency vehicle access at Laetitia Vineyard Drive does not guarantee emergency-only access, because residents could open and close the gate for non-emergency use. |

| Impact No. | Description |
|----------------------------|--|
| TR Impact 12 | The proposed control of the emergency vehicle access at Laetitia Vineyard Drive does not guarantee emergency-only access, because residents could open and close the gate for non-emergency use, significantly contributing to the cumulative degradation of this intersection. |
| TR Impact 14 | The proposed project would exacerbate projected deficient operations along Highway 101 during the a.m. and p.m. peak hours under Cumulative Conditions. The proposed project would exacerbate existing deficient conditions at the Highway 101/Los Berros Road/North Thompson Road ramp junctions during the p.m. peak hour under Cumulative Conditions. |
| AIR QUALITY | |
| AQ Impact 6 | ROG, NO _x and PM ₁₀ long-term operation emissions would exceed the APCD's Tier II Threshold. Development of the project would result in a direct long-term impact on air quality. |
| AQ Impact 9 | The proposed project is inconsistent with the general land use and planning policies identified in the Clean Air Plan, resulting in air pollutants generated by increased traffic trips, resulting in a long-term, significant, and unavoidable impact. |
| AQ Impact 10 | The proposed project is inconsistent with the regional land use and planning policies identified in the Clean Air Plan, resulting in a cumulative, significant, adverse, and unavoidable impact. |
| NOISE | |
| NS Impact 2 | Development of the proposed project would create significant amounts of new vehicle traffic traveling on North Thompson Road, which would exacerbate the current exceedance of the 60 dBA outdoor noise threshold as defined by the Noise Element. Project-generated vehicle traffic traveling on North Thompson Road would result in a direct long-term noise impact. |
| NS Impact 3 | Development of the proposed project would expose residential parcels of Sub-cluster C (Lots 46 through 65) to stationary noise levels associated with activities resulting from operations at the processing facility during harvest season estimated to exceed the hourly nighttime L _{eq} threshold of 45 dBA and the hourly daytime 50 dBA L _{eq} thresholds, resulting in a direct long-term noise impact. Development of the proposed project would expose residential parcels throughout the project site to equipment noise levels associated with vineyard operations estimated to exceed the hourly nighttime Leq threshold of 45 dBA and the hourly daytime 50 dBA L _{eq} thresholds, resulting in a direct long-term noise impact. |
| NS Impact 5 | Development of the proposed project would significantly contribute to cumulative vehicle traffic on North Thompson Road, which would exacerbate the current exceedance of the 60 dBA outdoor noise threshold as defined by the Noise Element under cumulative conditions, resulting in a direct long-term noise impact. |
| AESTHETIC RESOURCES | |
| AES Impact 4 | Visibility of development and associated earthwork related to Main Road 2, residential development of Sub-cluster E (Lots 87 through 105), Roads A, B, E, and F, residential development on Lot 46, the water storage tank, associated cut slope and access road, would adversely affect the rural visual character and increase noticeability of the project as seen from Highway 101 resulting in a direct long-term impact. |
| AES Impact 5 | Visibility of the residential development of Sub-cluster A (Lots 1 through 23) would adversely affect the rural visual character of the area and would be in conflict with SRA goals and the Highway 101 Corridor Design Standards, resulting in a direct long-term impact. |

| Impact No. | Description |
|--|---|
| AES Impact 6 | Visibility of the residential development of Sub-cluster B (Lots 24 through 43) would adversely affect the natural and rural visual character of the Upper Los Berros Road corridor resulting in a direct long-term impact. |
| AES Impact 18 | The visibility of individual project elements in the context of emerging development along the Highway 101 corridor would result in direct and indirect long term adverse cumulative impacts. |
| HAZARDS AND HAZARDOUS MATERIALS | |
| HM Impact 2 | The proposed project is inconsistent with CAL FIRE requirements for maximum road lengths, which may result in a significant fire hazard. |
| PUBLIC SERVICES AND UTILITIES | |
| PSU Impact 4 | The proposed project would increase the number of residents served by the CAL FIRE and other emergency services, which would result in an increased demand for emergency services personnel. |

1. Preliminary Alternatives

The following nine preliminary alternatives to the proposed project were considered as part of the screening analysis:

- *No Project Alternative.* This alternative considers impacts based on the existing conditions and zoning without further development such as the proposed project.
- *Redesigned Project: Standard Subdivision Alternative.* This alternative considers standard subdivision based on the parcel size allowable pursuant to the County Land Use Ordinance.
- *Reduced Project: Ordinance and General Plan Consistency Alternative.* This alternative considers a reduced density cluster division pursuant to the Land Use Ordinance and the Agriculture and Open Space Element.
- *Reduced Project: Reduced Density Two-Cluster Alternative.* This alternative considers a two-cluster design, and lot size reduction to 10,000 square feet within the Agriculture land use category. The overall residential density would be reduced by approximately 26 percent.
- *Reduced Project: Single Cluster Alternative.* This alternative considers a project that includes residential lots within a single cluster to concentrate development in one location on the project site.
- *Redesigned Project: Effluent Disposal Alternative.* This alternative proposes to distribute treated effluent throughout the vineyards for disposal, rather than designate a specific area for disposal. Additional disposal areas would include landscaping and common areas.

- Alternative Project Location. This alternative will include analysis of a project located on an alternative site that would reduce otherwise significant impacts to less than significant levels, to the maximum extent feasible.
- Proposed Project with Tract Design Mitigation. This alternative is the proposed project with implementation of EIR recommended mitigation measures intended to reduce significant environmental impacts by re-design of the proposed tract map.
- Alternative Access Alternative. This alternative proposes a secondary access road, which would extend south from Main Road 1, to connect with an extension of Cimmaron Way (offsite). This alternative also includes the extension of Dana Foothill Road across Melschau Creek, to create a circulation connection to Tefft Street, and improve primary and secondary access for the project and surrounding areas. This alternative is considered based on comments received from County Public Works and Caltrans.

2. Alternative Considered and Rejected for Further Review

The *Redesigned Project Standard Subdivision Alternative* consists of a subdivision pursuant to the subdivision design standards of Section 22.22.040 (Agriculture land use category) and Section 22.22.050 (Rural Lands land use category). The Agriculture portion of the project site supports approximately 487 acres of row crops (vineyards and orchards) and approximately 340 acres of grazing land. The LUO identifies a 20-acre minimum for irrigated row crops, and a 320-acre minimum for grazing land, as shown in the calculations below:

487 acres of irrigated crops / 20 acres per parcel = 24 parcels

340 acres of grazing land / 320 acres per parcel = 1 parcel

This would allow 25 parcels, and would allow two dwellings per lot, for a total of 50 dwellings within the Agriculture land use category portion of the project site. This assumption depends on retaining all existing, qualifying vineyards onsite, which may not be feasible. This is an estimated number, because this alternative does not specifically identify the location of lots, nor quantify the acreage of vineyards potentially removed. Based on the parcel size tests, the minimum parcel size for Rural Lands portion of the project site is 20 acres. The applicable acreage of the project site within the Rural Lands land use category is 693.78 acres, which excludes the 388.5-acre parcel proposed for the future dude ranch. The number of buildable lots is therefore 34. Two dwellings are allowed on each lot, for a total of 68 dwellings.

Implementation of this alternative would result in a total of 59 20-acre lots, and one 388-acre lot for the dude ranch and an open space easement. Each 20-acre lot would be allowed to support two primary dwellings, for a total of 118 dwellings, including the existing estate residence. This alternative was considered and rejected for further review because the sale and development of each residential lot would fragment the existing agricultural operation, and would not sustain vineyard production as a continuous unit. In addition, implementation of this alternative would not avoid or minimize identified significant and unavoidable impacts.

3. Alternatives Considered for Further Review

Of the nine preliminary alternatives, the following eight were brought forward for further review:

1. No Project Alternative
2. Reduced Project: Ordinance and General Plan Consistency Alternative
3. Reduced Project: Reduced Density Two-Cluster Alternative
4. Redesigned Project: Single Cluster Alternative
5. Redesigned Project: Effluent Disposal Alternative
6. Alternative Project Location
7. Proposed Project with Tract Design Mitigation
8. Alternative Access Alternative

The following is a qualitative analysis of the alternatives brought forward for further review. The analysis identifies the level of impact that would result if the alternatives were to be implemented and how they compare to the proposed project. These alternatives would either have comparable impacts or would reduce environmental impacts as compared to the proposed project, would meet most of the basic objectives of the proposed project, and are considered feasible for implementation. CEQA does not require the alternatives evaluation to be at the same level of detail as the proposed project, but does require the EIR to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project CEQA *Guidelines* Section 15126.6(d)).

C. ALTERNATIVES ANALYSIS

The following is a qualitative analysis of the alternatives brought forward for further review. The analysis identifies the level of impact that would result if the alternatives were to be implemented and how they compare to the proposed project. These alternatives would either have comparable impacts or would reduce environmental impacts as compared to the proposed project, would meet most of the basic objectives of the proposed project, and are considered feasible for implementation. CEQA does not require the alternatives evaluation to be at the same level of detail as the proposed project, but does require the EIR to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project CEQA *Guidelines* Section 15126.6(d)).

1. No Project Alternative

The No Project Alternative would leave the project site in its current condition, as a primarily agricultural use. Implementation of this alternative would not preclude future development on the project site; however, it is likely the site would remain in agricultural production if the agricultural cluster project is not implemented. Significant agricultural resources, transportation and circulation, aesthetic resources, hazards and hazardous materials, and public services and utilities impacts would be avoided.

The existing agricultural operation, which includes a winery, crop production, and some grazing, has the potential to affect the environment, including impacts to biological resources, archaeological resources, air quality, noise levels, water resources, and water quality. Crop production is not considered a discretionary use. Best management practices for agricultural

production operations are encouraged by the county; however, such practices are considered voluntary and are not enforceable. Implementation of the proposed project may result in increased protection of cultural resources, biological resources, and water quality upon implementation of recommended mitigation measures. Such mitigation would not occur upon implementation of the no project alternative.

2. Reduced Project – Ordinance and General Plan Consistency Alternative

This alternative considers a reduced density cluster division pursuant to Land Use Ordinance Section 22.22.140 (specific to the Rural Lands land use category) and the Agriculture and Open Space Element (specific to the Agriculture land use category). This alternative assumes that the project is grandfathered, and the January 2003 LUO applies.

a. Consistency with Plans and Policies

1) Land Use Ordinance

(a) Agricultural Lands Clustering Ordinance

The Agricultural Lands Clustering Ordinance states that “it is the policy of the Board to encourage the use of clustering by allowing the number of clustered parcels to equal the number of dwelling units normally permitted on a standard agricultural land division”. The ordinance states that “the number of parcels allowed in an agricultural cluster division shall be equivalent to the number of dwellings normally allowed in the Agriculture land use category in compliance with Sections 22.22.040...and 22.30.420.A” (Section 22.22.150). No guidance is provided in this section of the LUO regarding the portion of the site within the Rural Lands land use category.

The following discussion assumes that the standards to determine density are applied as if the entire project site is within the Agriculture land use category. Assuming application of the “use test” to determine minimum parcel size, the minimum parcel size would be 20 acres (irrigated vineyards). The project site supports approximately 627 acres of vineyards and approximately 894 acres of grazing land, located in both the Agriculture and Rural Lands land use categories. The LUO identifies a 20-acre minimum for irrigated row crops, and a 320-acre minimum for grazing land, as shown in the calculations below:

$$627 \text{ acres of irrigated crops} / 20 \text{ acres per parcel} = 31 \text{ parcels}$$

$$894 \text{ acres of grazing land} / 320 \text{ acres per parcel} = 2 \text{ parcels}$$

This would allow 66 parcels (33 lots x two dwellings per lot). The proposed project includes removal of approximately 113 acres of vineyard, which reduces the qualifying acreage for irrigated vineyard to approximately 514 acres; therefore 56 parcels would be allowed. This is an estimated number, because this alternative does not specifically identify the location of lots, nor quantify the acreage of vineyards removed.

The minimum area for buildable lots is 10,000 square feet, assuming community water and community sewer; therefore, it is likely that vineyard removal could be reduced by site design. The anticipated number of lots would be approximately 56 to 66.

The Agricultural Lands Clustering Ordinance requires 95 percent open space; therefore developed areas may not exceed approximately 76 acres (calculation does not include 388.5-acre dude ranch parcel). Structural uses allowed in defined open space areas include: “ranch/farm headquarters including two of the [allowed] residential units...; residential accessory structures and farm support housing...provided that the building site does not exceed 2.5 acres...areas set aside for the preservation of historic buildings identified by the Land Use Element...agricultural accessory structures or agricultural processing uses essential to the continuing agricultural production of food and fiber in the immediately surrounding area...which shall not occupy an aggregate area of the site larger than five acres” (Section 22.22.150.J.3). Nonstructural uses allowed in defined open space areas include: “crop production and grazing; animal raising and keeping; specialized animal facilities; nursery specialties (nonstructural); range land or wildlife preserves; water storage or recharge; leachfield or spray disposal area; scenic area protection or buffers from hazardous areas; public outdoor recreation uses on non-prime lands; or other similar open space uses” (Section 22.22.150.J.4.). Based on this definition, the proposed wastewater treatment facility, ranch headquarters (including the homeowners association facility and private recreational uses), and structural components of the equestrian facility are not considered allowable uses within the open space parcels.

(b) Determining Density by Land Use Category

Applying the Agriculture Lands Cluster Ordinance to the Agriculture portion of the project site, and applying the Cluster Division Ordinance to the Rural Lands portion of the project site would result in approximately 47 to 50 10,000-square foot lots and 34 one-acre lots, for a total of approximately 81 residential lots (refer to discussion below).

Agricultural Lands Clustering

Assuming the Agricultural Lands Clustering Ordinance applies only to the land within the Agriculture land use category, the minimum parcel size would be 20 acres (irrigated vineyards). The project site supports approximately 487 acres of row crops (vineyards and orchards) and approximately 340 acres of grazing land. The LUO identifies a 20-acre minimum for irrigated row crops, and a 320-acre minimum for grazing land, as shown in the calculations below:

$$\begin{aligned} 487 \text{ acres of irrigated crops} / 20 \text{ acres per parcel} &= 24 \text{ parcels} \\ 340 \text{ acres of grazing land} / 320 \text{ acres per parcel} &= 1 \text{ parcel} \end{aligned}$$

This would allow 50 parcels (25 lots x two dwellings per lot). This assumption also depends on retaining all existing, qualifying vineyards onsite. The proposed project includes removal of approximately 27.9 acres of vineyard within the Agriculture land use category, which reduces the qualifying acreage to approximately 460 acres; therefore 47 parcels would be allowed. This is an estimated number, because this alternative does not specifically identify the location of lots, nor quantify the acreage of vineyards removed. The minimum area for buildable lots is 10,000 square feet, assuming community water and community sewer; therefore, it is likely that vineyard removal could be reduced by site design. Applying the 95 percent open space requirement, approximately 41 acres would be considered buildable. As discussed above, the proposed wastewater treatment facility, ranch headquarters (including the homeowners

association facility and private recreational uses), and structural components of the equestrian facility are not considered allowable uses within the open space parcels.

Rural Lands Cluster Division

The Cluster Division Ordinance states that “the number of buildable lots allowed in a cluster division shall be determined through the use of the parcel size tests...applicable to the land use categories in which the site is located” (Section 22.22.140.B). Based on the parcel size tests, the minimum parcel size for Rural Lands portion of the project site is 20 acres. The applicable acreage of the project site within the Rural Lands land use category is 693.78 acres, which excludes the 388.5-acre parcel proposed for the future dude ranch. The number of buildable lots is therefore 34. The Cluster Division Ordinance does not identify a density bonus for clusters within the Rural Lands land use category. Each buildable lot would be one acre in size.

The LUO requires 90 percent open space; therefore developed areas may not exceed approximately 69 acres. The LUO states that allowable uses within the open space parcel(s) may include one of the allowable residential units (6,000-square foot maximum development area), agricultural accessory buildings, and the following uses: “crop production or rangeland; historic, archaeological, or wildlife preserves; water storage or recharge; leachfield or spray disposal area; scenic areas; protection from hazardous areas; public outdoor recreation; or other similar open space use” (Section 22.22.140.E). Based on this definition, the proposed equestrian facility and ranch headquarters would not be considered allowable uses, as proposed.

2) Agriculture and Open Space Element (AOSE)

Agriculture and Open Space Element Policy 22 (AGP 22) provides policies specific to major agricultural cluster projects within the Agriculture land use category. The policy states that “the maximum number of parcels allowed in a major agricultural cluster project shall be equivalent to the number of primary dwellings normally allowed on the parcels that would result from a conventional land division in the Agriculture land use category based on the minimum parcel size criteria specified in Figure 2-2 [of the Agriculture and Open Space Element]”. Figure 2-2 of the AOSE states that the minimum parcel size based on Natural Resource Conservation Service (NRCS) Land Capability Classifications I/II (irrigated and planted) is 20 acres, and Classifications I/II (irrigated/not planted and non-irrigated) is 40 acres. The project site does not include irrigated Class II soils. The minimum parcel size for Classifications III through VII (irrigated) is 40 acres. This minimum parcel size standard is inconsistent with the LUO, which allows a 20-acre minimum parcel size for land used for row crops. The minimum parcel size for non-irrigated soils is 160 acres (Class III and IV) and 320 acres (Class VI, VII, and VIII). The policy states that “all resulting agricultural parcels must meet the minimum parcel size criteria of Figure 2-2 [of the AOSE] and must be covered by a permanent agricultural open space easement”.

The discussion below is divided into two assumptions: 1) applying Agriculture and Open Space Element Policy 22 throughout the entire project site regardless of land use category, and 2) assuming that Agriculture and Open Space Element Policy 22 only applies to the portion of the site within the Agriculture land use category.

(a) Applying Standard Regardless of Land Use Category

The project site supports approximately 627 acres of irrigated soils. The remaining area is not irrigated, and assuming exclusion of the 338-acre dude ranch parcel, this remaining non-irrigated area totals 894 acres. The classifications within the non-irrigated area range from IV to VIII. This analysis considers applying the policies of AGP 22 to the entire site, considering the project as a major agricultural cluster regardless of the different land use categories (i.e., Agriculture and Rural Lands). Using this method, the total number of parcels would be approximately 36.

- Applying the 40-acre minimum parcel size to irrigated areas results in the following calculation: $627 \text{ acres} / 40 = 15 \times 2 = 30$ parcels
- Applying the 160-acre minimum parcel size to Class III/IV non-irrigated areas results in the following calculation: approximately $230 \text{ acres} / 160 = 1.4 \times 2 = 2$ parcels
- Applying the 320-acre minimum parcel size to Class VI – VIII non-irrigated areas results in the following calculation: approximately $664 \text{ acres} / 320 = 2 \times 2 = 4$ parcels

(b) Applying Policy Based on Land Use Category

The 828-acre portion of the project site within the Agriculture land use category supports approximately 487 acres of irrigated soils. The remaining 341 acres is not irrigated. The classifications within the irrigated and non-irrigated areas range from Class IV to Class VIII; however, the soil types are predominantly Class IV. This analysis considers applying the policies of AGP 22 to the portion of the site within the Agriculture land use category only. Using this method, the total number of parcels would be approximately 28 within the Agriculture land use category.

- Applying the 40-acre minimum parcel size to irrigated areas results in the following calculation: $487 \text{ acres} / 40 \text{ acres per parcel} = 12 \times 2 = 24$ parcels
- Applying the 160-acre minimum parcel size to non-irrigated areas results in the following calculation: approximately $341 \text{ acres} / 160 = 2 \times 2 = 4$ parcels

b. Geology and Soils

Implementation of this alternative would result in similar impacts as the proposed project. No lots would be located within older landslide deposits; however, lots may be located below these deposits. Due to site topography, substantial grading, including deep cut slopes is anticipated to implement this alternative. Due to the reduction in project size, the total area of disturbance would be reduced by approximately 15 to 60 percent. Implementation of standard mitigation measures specific to geologic hazards would be required. In addition, individual soils engineering reports would be required upon application for construction permits for individual lot development.

c. Water Resources

Implementation of this alternative would reduce the water demand for residential uses by 15 to 60 percent, due to the reduction in the number of residential lots. Water conservation measures are recommended, similar to the proposed project. Potential impacts to surface water quality would be reduced; however, potential effects, including the potential for sediment and

hydrocarbon discharge into surface water would occur. Mitigation would be necessary, including implementation of erosion and sedimentation control, best management practices, and a Stormwater Pollution Prevention Plan.

d. Biological Resources

Implementation of this alternative would result in an approximately 15 to 60 percent reduction in density. Residential lots and associated roadways could be further clustered to avoid or reduce effects to biological resources, including secondary effects due to required vegetative fuel management. Lot size reduction to 10,000 square feet in the Agriculture land use category would further reduce site disturbance and potential effects to oak woodland and other habitats. Onsite drainages and Los Berros Creek would be directly and indirectly affected by internal road crossings and improvements to Upper Los Berros Road. Due to environmental constraints, including project site visibility, agricultural production, archaeological resources, and geology, and warranted offsite road improvements, impacts would be reduced; however, the impacts to oak woodland may remain significant and unavoidable. Mitigation, similar to the proposed project, would be required.

e. Paleontological Resources

The boundaries of this alternative would be located within areas mapped as Obispo and Paso Robles formations, which have produced significant fossils in San Luis Obispo County. Implementation of this alternative would result in similar impacts to paleontological resources as the proposed project, although the potential area of effect would be reduced. Implementation of a mitigation and monitoring plan would be required.

f. Archaeological Resources

This alternative proposes a reduction in density, which would allow for avoidance of highly significant archaeological resources, as recommended in the archaeological resources analysis. In addition, implementation of this alternative would include the removal of the equestrian facility and associated access road, which would further reduce identified significant impacts to archaeological resources. Potential impacts, including direct and indirect impacts to known archaeological sites may occur. Mitigation similar to the proposed project, including Phase III date recovery and monitoring ground disturbance would be necessary in these areas, and would reduce potential impacts to less than significant provided all identified highly sensitive areas are avoided.

g. Historical Resources

Implementation of this alternative would include the elimination of private recreational elements associated with the ranch headquarters, including the pool, clubhouse, and tennis courts. Alternative site design could be implemented to preserve the historical integrity of the Campodónico Ranch complex. If historical structures would need to be moved to accommodate facilities, mitigation measures recommended in the EIR project analysis would apply.

h. Agricultural Resources

As noted in the EIR analysis, the project site supports approximately 678 acres of irrigated crops. Irrigated areas are generally located in the areas of the project site better suited for development, considering geology, topography, and presence of natural creeks and drainages. Based on the environmental constraints identified on the project site, it appears that complete avoidance of Farmland and consistency with the Agriculture and Open Space Element Buffer Policies would not be achieved upon implementation of any large-scale agricultural cluster development on the project site. However, this alternative proposes a reduction in density, which would allow for further consideration of avoidance of Farmland, and the potential to increase buffers between Farmland and residential use.

i. Transportation and Circulation

Implementation of this alternative would reduce the number of traffic trips by approximately 15 to 60 percent. This would reduce, but not avoid, potential impacts to local roadways. Offsite road improvements may be necessary based on further quantitative analysis. Based on the current trip generation counts on Los Berros Road, and anticipated average daily trips generated by this alternative, road improvements including widening and the creation of shoulders would be necessary.

j. Air Quality

Implementation of this alternative would require less acreage of disturbance compared to the proposed project. The size of the project is reduced, and would generate fewer emission concentrations during the construction phase. Operational impacts related to traffic trips, including commuter trips to urban services, would result in significant and adverse impacts, including inconsistency with the Clean Air Plan.

k. Noise

Implementation of this alternative would reduce potential impacts resulting from exposure to stationary and agricultural related noise. Lots could be located an adequate distance from the winery, which would avoid the noise impact resulting from stationary noise generated during the peak crush season. Impacts related to land use conflicts, due to the proximity of proposed residential uses adjacent to production agriculture, would occur, though on a lesser scale. Implementation of this alternative would generate transportation-related noise impacting off-site residents adjacent to affected roadways, similar to the proposed project.

l. Aesthetics

Implementation of this alternative would minimize significant and adverse impacts to aesthetic resources. Residential clusters could be located outside of areas identified as highly visible and mapped SRA and Highway Corridor Design Standards areas. Mitigation measures, including implementation of design standards (i.e.; architectural, colors, materials, exterior lighting, and landscaping) would be necessary for all lots visible from public roadways. Incorporation of recommendations to eliminate lots within highly visible areas would avoid significant impacts to visual resources.

m. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project. CAL FIRE regulations state that the maximum dead-end road length for one-acre parcels is 1,320 feet. This proposed alternative would not comply with this standard, due to the lack of secondary access to the project site that meets both CAL FIRE and Caltrans requirements.

n. Public Services and Utilities

Implementation of the proposed project would reduce the on-site density by 15 to 60 percent, which would reduce the demand for emergency services personnel.

o. Other Issue Areas

Implementation of this alternative would result in wastewater, recreation, and population/housing impacts similar to the proposed project.

3. Reduced Project – Reduced Density Two-Cluster Alternative

The reduced project, reduced density two-cluster alternative includes an approximately 26 percent residential density reduction and parcel size reduction within the Agriculture land use category. This alternative includes one cluster within the Agricultural land use category (10,000-square foot residential lots), and one cluster within the Rural Lands land use category (one-acre residential lots). The residential lots would be clustered in two sub-clusters to generally avoid areas currently supporting productive vineyards (refer to Figure V.I.-1). The proposed ranch headquarters would remain in the applicant's proposed location; however, private recreational facilities including the pool and tennis courts would be eliminated. The proposed equestrian facility would be located in the applicant's proposed location.

a. Geology and Soils

Implementation of this alternative would result in similar impacts as the proposed project. No lots would be located within older landslide deposits; however, the lots would be located below these deposits. Substantial grading, including deep cut slopes is anticipated to implement this alternative. Implementation of standard mitigation measures specific to geologic hazards would be required. In addition, individual soils engineering reports would be required upon application for construction permits for individual lot development.

b. Water Resources

Implementation of this alternative would reduce the water demand for residential uses by 26 percent, due to the reduction in the number of residential lots. Due to the reduced lot size within the Agriculture land use category, the potential for landscape water demand would be minimized. Water conservation measures are recommended, similar to the proposed project. Potential impacts to surface water quality would be similar to the proposed project, including the potential for sediment and hydrocarbon discharge into surface water. Mitigation would be necessary, including implementation of erosion and sedimentation control, best management practices, and a Stormwater Pollution Prevention Plan.

c. Biological Resources

Implementation of this alternative would affect annual grassland, riparian scrub, and coast live oak woodland. Primarily, impacts to biological resources would be limited to grassland habitat, and significant adverse project-specific impacts to oak woodland would be avoided. Drainages D, E, and G would be affected by the development, primarily limited to road crossings and indirect effects due to ground disturbance and down-gradient discharge of pollutants (similar to the proposed project). Impacts to special status plant and wildlife species would be minimized based on the reduced area of effect; however, impacts would occur, and mitigation would be required.

d. Paleontological Resources

The boundaries of this alternative would be located within areas mapped as Obispo and Paso Robles formations, which have produced significant fossils in San Luis Obispo County. Implementation of this alternative would result in similar impacts to paleontological resources as the proposed project. Implementation of a mitigation and monitoring plan would be required.

e. Archaeological Resources

Implementation of this alternative would result in direct impacts to significant archaeological sites SLO-2523 and SLO-2527. Mitigation measures, including capping the core of the site and archaeological monitoring is recommended to avoid direct impacts to these sites. Other impacts would include potential indirect impacts to known archaeological sites. Mitigation similar to the proposed project, including monitoring ground disturbance would be necessary. Highly sensitive archaeological sites would be avoided; therefore, significant impacts could be mitigated to less than significant.

f. Historical Resources

Implementation of this alternative would include the elimination of private recreational elements associated with the ranch headquarters, including the pool, clubhouse, and tennis courts. Alternative site design could be implemented to preserve the historical integrity of the Campodonico Ranch complex. If historical structures would need to be moved to accommodate facilities, mitigation measures recommended in the EIR project analysis would apply.

g. Agricultural Resources

Implementation of this alternative would avoid the direct removal of approximately 100 acres of vineyard by locating lots generally outside of currently productive areas. This proposed alternative would not meet the 500-foot agriculture buffer recommended by the County Agriculture Department, and vineyard removal would be required to meet a minimum buffer distance of 200 feet. Proposed residential areas would generally be clustered near the center of the parcel, which would minimize traffic trips throughout the remainder of the vineyard. The impact to agricultural resources impact would be reduced, but would remain significant and adverse due to inadequate buffers and potential land use conflicts.

h. Transportation and Circulation

Implementation of this alternative would reduce the number of traffic trips by approximately 26 percent. This would reduce, but not avoid, potential impacts to local roadways. Offsite road improvements may be necessary based on further quantitative analysis. Based on the current trip generation counts on Los Berros Road, and anticipated average daily trips generated by this alternative, road improvements including widening and the creation of shoulders would be necessary.

i. Air Quality

Implementation of this alternative would require less acreage of disturbance compared to the proposed project. The size of the project is reduced, and would likely generate fewer emission concentrations during the construction phase. Operational impacts, including the generation of odors would remain significant, and mitigation would be required, similar to the proposed project. Operational impacts related to traffic trips, including commuter trips to urban services, would result in a significant and adverse impact due to inconsistency with the Clean Air Plan.

j. Noise

Implementation of this alternative would reduce potential impacts resulting from exposure to stationary and agricultural related noise. Lots would not be located adjacent to the winery, which would avoid the noise impact resulting from stationary noise generated during the peak crush season. Significant impacts related to land use conflicts, due to the proximity of proposed residential uses adjacent to production agriculture, would occur, though on a lesser scale. Implementation of this alternative may generate transportation-related noise impacting off-site residents adjacent to affected roadways, similar to the proposed project.

k. Aesthetics

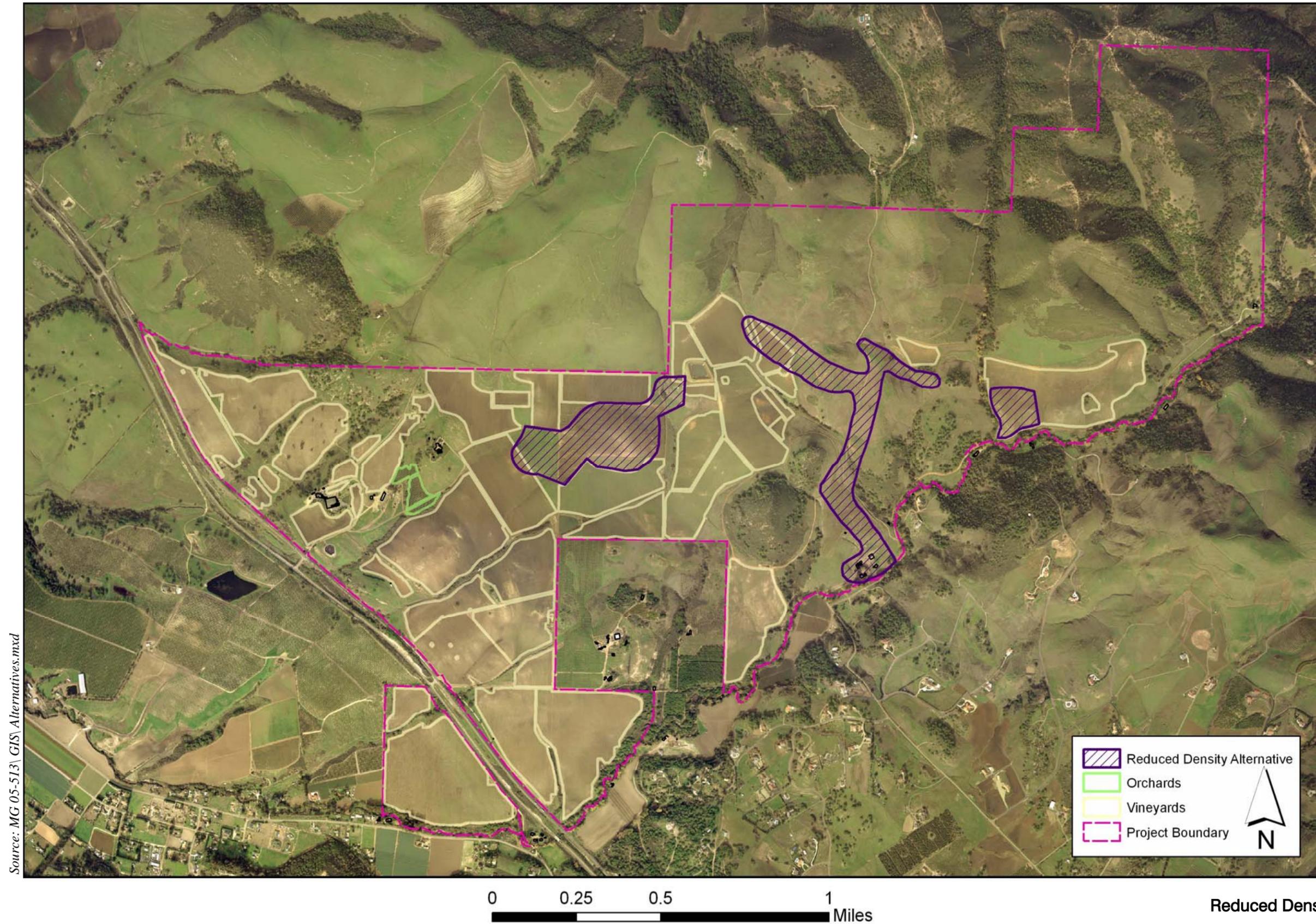
Implementation of this alternative would minimize significant and adverse impacts to aesthetic resources. Residential clusters would be located outside of mapped SRA and Highway Corridor Design Standards areas. Mitigation measures, including implementation of design standards (i.e.; architectural, colors, materials, exterior lighting, and landscaping) would be necessary for all lots visible from public roadways.

l. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project. CAL FIRE regulations state that the maximum dead-end road length for one-acre parcels is 1,320 feet, and the maximum dead-end road length for parcels less than one acre is 800 feet. This proposed alternative would not comply with these standards, due to the lack of secondary access to the project site.

m. Public Services and Utilities

Implementation of the proposed project would reduce the on-site density by 26 percent, which would reduce the demand for emergency services personnel.



Source: MG 05-513\GIS\Alternatives.mxd

| | |
|---|-----------------------------|
|  | Reduced Density Alternative |
|  | Orchards |
|  | Vineyards |
|  | Project Boundary |


N

Reduced Density Alternative
FIGURE VI-1

Back of Figure VI-1

n. Other Issue Areas

Implementation of this alternative would result in wastewater, recreation, and population/housing impacts similar to the proposed project.

4. **Redesigned Project – Single Cluster Alternative**

This alternative proposes clustering all residential lots within a single, general location on the project site, within the Rural Lands land use category. Proposed lots would be one acre in size. Residential density would be reduced by approximately 40 percent, compared with the proposed project. Community water and sewer are proposed by this alternative, based on the presence and operation of the existing well system, and severe limitations for standard septic/leach field systems. Clustered residential parcels would be located within approximately 70 acres in the Rural Lands land use category (refer to Figure VI-2). Approximately 10 acres of vineyard would be removed to accommodate the development; however this would be a 90 percent reduction from the project as proposed.

a. Geology and Soils

Implementation of this alternative would result in similar impacts as the proposed project. No lots would be located within older landslide deposits; however, the lots would be located below these deposits and potentially subject to rockfall. Substantial grading, including deep cut slopes is anticipated to implement this alternative. Implementation of standard mitigation measures specific to geologic hazards would be required. In addition, individual soils engineering reports would be required upon application for construction permits for individual lot development.

b. Water Resources

Implementation of this alternative would likely reduce water demands by 40 percent, due to a reduction in residential density. Similar to the proposed project, water conservation methods would be necessary to reduce the effects to underlying aquifers during prolonged drought conditions (three years). Impacts to surface water quality would be similar to the proposed project; however, due to the decreased area of effect, the potential for increased runoff and discharge of sediments would be reduced. Mitigation measures would be required, similar to the proposed project.

c. Biological Resources

Habitats located within the proposed alternative cluster area include annual grassland, coast live oak woodland, riparian scrub, freshwater marsh wetland, and coastal scrub. Lot development could be concentrated within annual grassland habitats; however, oak woodland present within the eastern portion of the site would be affected by lot development and fuel management. Drainages C, D, and E are located within or adjacent to the proposed alternative cluster area, and would be directly affected by road improvements and indirectly affected by lot development. Potential impacts include down-gradient discharge of pollutants and a loss of habitat (similar to the proposed project). Impacts to special status plant and wildlife species would be similar to the proposed project, and mitigation would be required.

d. Paleontological Resources

The proposed location of this alternative would be located within areas designated as Paso Robles formation and Obispo formation. These formations have the potential to produce significant fossils. Implementation of mitigation measures identified in the EIR, including a paleontological resources monitoring plan would be required.

e. Archaeological Resources

Based on archaeological surveys conducted for the EIR, no archaeological sites are located within the proposed alternative residential cluster area. Construction of the equestrian center would affect significant archaeological site SLO-2523. Mitigation measures, including capping the core of the site and archaeological monitoring is recommended to avoid direct impacts to these sites. Other impacts would include potential indirect impacts to known archaeological sites. Mitigation similar to the proposed project, including monitoring ground disturbance would be necessary for anticipated impacts to SLO-2523.

f. Historical Resources

Implementation of this alternative does not propose any revisions to the proposed ranch headquarters/homeowners association facility. Alternative siting could be implemented to preserve the integrity of the historical complex. If historical structures would need to be moved to accommodate facilities, mitigation measures recommended in the EIR project analysis would apply.

g. Agricultural Resources

Implementation of this alternative would avoid the removal of approximately 100 acres of vineyard by locating lots generally outside of currently productive areas. Residential parcels could be sited to provide adequate buffers from existing vineyards, which would avoid this significant and adverse impact. Potential impacts resulting from the presence of people within the vineyards would be significantly reduced, due to the general separation of the uses. The impacts resulting from the conversion of Farmland would be substantially reduced; however, the impact may still be significant and unavoidable.

h. Transportation and Circulation

Implementation of this alternative would result in an approximately 40 percent reduction in the number of trips generated by the proposed project. This would reduce the impact on affected roadways. Further quantitative analysis would be required to determine the extent of warranted road improvements. Based on the current trip generation counts on Los Berros Road, and anticipated average daily trips generated by this alternative, road improvements including widening and the creation of shoulders would be necessary. The proposed cluster would be located in the eastern portion of the project site, which may reduce the potential for non-emergency use of the Laetitia Vineyard Drive/Highway 101 at-grade intersection.

i. Air Quality

Implementation of this alternative would require less acreage of disturbance compared to the proposed project. The size of the project is reduced, and would likely generate fewer emission concentrations during the construction phase. Operational impacts, including the generation of odors would remain significant, and mitigation would be required, similar to the proposed project. Operational impacts related to traffic trips, including commuter trips to urban services, would result in a significant and adverse impact due to inconsistency with the Clean Air Plan.

j. Noise

Implementation of this alternative would reduce potential impacts resulting from exposure to stationary and agricultural related noise. Lots would not be located adjacent to the winery, which would avoid the noise impact resulting from stationary noise generated during the peak crush season. Impacts related to land use conflicts, due to the proximity of proposed residential uses adjacent to production agriculture adjacent to the eastern and western boundaries of the residential cluster area would occur, though on a lesser scale due to land use buffers. Implementation of this alternative would generate transportation-related noise impacting off-site residents adjacent to affected roadways, similar to the proposed project.

k. Aesthetics

Implementation of this alternative would minimize significant and adverse impacts to aesthetic resources. Residential clusters would be located outside of mapped SRA and Highway Corridor Design Standards areas. Mitigation measures, including implementation of design standards (i.e.; architectural, colors, materials, exterior lighting, and landscaping) would be necessary for all lots visible from public roadways.

l. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project. CAL FIRE regulations state that the maximum dead-end road length for one-acre parcels is 1,320 feet. This proposed alternative would not comply with this standard, due to the lack of secondary access to the project site.

m. Public Services and Utilities

Implementation of the proposed project would reduce the on-site density by approximately 40 percent, which would reduce the demand for emergency services personnel.

n. Other Issue Areas

Implementation of this alternative would result in wastewater, recreation, and population/housing impacts similar to the proposed project.

5. **Redesigned Project – Effluent Disposal Alternative**

This alternative proposes alternative disposal sites for wastewater. The proposed treatment plant would remain in the same location. Disposal would occur throughout the vineyard, and would also be used to irrigate landscaping. Mixing treated effluent with other irrigation waters would

also dilute nitrates, and reduce the potential for salt loading within the disposal areas. Identification of primary disposal locations, and possibly rotation of areas used for treated effluent disposal would reduce the potential for salt loading in the underlying soils and groundwater.

a. Water Resources

Implementation of this alternative may reduce the effects to the underlying aquifers by dispersing and diluting treated effluent, and reducing the potential for salt loading.

b. Archaeological Resources

Significant, adverse impacts to archaeological site SLO-1699 would be avoided. Alternative locations for effluent disposal should be limited to non-culturally sensitive areas to prevent the build-up of salts within soils and potential degradation of significant archaeological sites.

c. Agricultural Resources

Implementation of this alternative would likely reduce the potentially adverse effects to agricultural resources by further diluting the treated effluent with groundwater (which would reduce salt loading in the underlying soils and groundwater), and dispersing the water over a larger area to minimize over-irrigation of a vineyard block.

d. Wastewater

Implementation of this alternative would result in impacts similar to the proposed project. The design of this alternative would be required to comply with Regional Water Quality Control Board standards for treated effluent disposal.

e. Other Issues

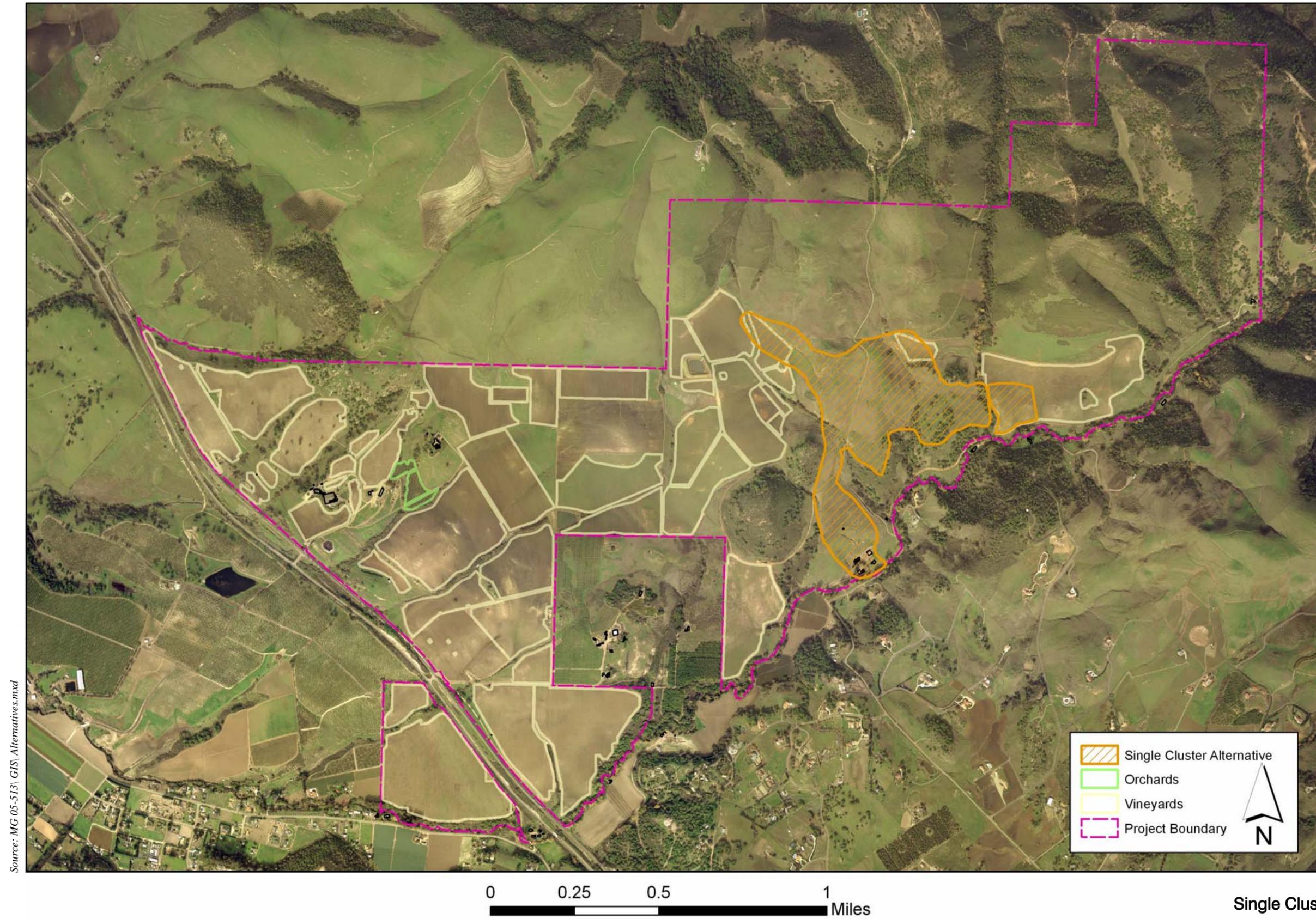
Implementation of this alternative would result in geology and soils, biological resources, paleontological resources, air quality, noise, aesthetic resources, recreation, hazards/hazardous materials, public services/utilities, and population/housing impacts similar to the proposed project.

6. **Alternative Project Location**

This alternative would eliminate the proposed dude ranch, and would cluster residential development on existing Parcel 3, and a portion of existing Parcel 4 (not currently under agricultural production). The overall residential density of the project would likely be substantially less than the proposed project, and would depend on the ability to provide a community wastewater disposal system.

a. Geology and Soils

Portions of this parcel include steep slopes, and further geotechnical study would be required prior to further consideration of this alternative. The presence of geologic hazards, such as landslides, is not mapped on geotechnical reports prepared for the project.



Single Cluster Alternative
FIGURE VI-2

Back of Figure VI-2

b. Water Resources

Implementation of this alternative would reduce the number of residences, which would reduce the demand for water supply. Based on the slopes, amount of ground disturbance, and presence of Drainages A and B, potential impacts to surface water quality include discharge of sediments, hydrocarbons, and other pollutants during construction activities and operation of the project. Mitigation measures would be required, including but not limited to stormwater management, erosion and sedimentation control, and spill prevention.

c. Biological Resources

Implementation of this alternative would affect areas dominated by coastal scrub, oak woodland, and riparian habitat. Aside from an existing residence, accessory structures, secondary uses, and access road, the remainder of the area is generally undisturbed. Further study of these areas, including special-status plant surveys would be required. Based on preliminary data regarding habitat types and the potential for special-status plant and wildlife presence, implementation of this alternative may result in additional impacts to biological resources. Drainages A and B, which are direct tributaries to Los Berros Creek, traverse the cluster area, and may be directly affected by road construction, and indirectly affected by lot development.

d. Paleontological Resources

The proposed cluster area would be located within an area underlain by the Monterey formation. This formation is known to produce significant fossils. Impacts would be similar to the proposed project, and mitigation would be required.

e. Archaeological Resources

Based on surveys conducted for the dude ranch location, archaeological resources are not present within the dude ranch boundaries. Additional surveys within the remainder of the cluster area would be required to verify presence or absence of resources, and to clarify potential impacts.

f. Historical Resources

Implementation of this alternative would site all proposed structures outside of the boundaries of the identified historical district; therefore, potential impacts to historical resources would be avoided.

g. Agricultural Resources

Implementation of this alternative would protect all areas currently under production, and would avoid removal of vineyards. Residential building envelopes could be sited a minimum of 500 feet from production vineyards, which would avoid this significant adverse impact. No access roads would be required to traverse the vineyards, and management of the vineyards would not be affected residential or recreational uses.

h. Transportation and Circulation

Implementation of this alternative would reduce the density of development onsite, which would reduce the number of traffic trips. Further quantitative analysis would be required to determine applicable mitigation measures, including implementation of off-site road improvements. The proposed cluster would be located in the far eastern portion of the project site, which may reduce the potential for non-emergency use of the Laetitia Vineyard Drive/Highway 101 at-grade intersection.

i. Air Quality

Implementation of this alternative would reduce the potential air quality impacts by reducing ground disturbance, emissions from construction equipment, and operational emissions due to traffic trips. The alternative would be inconsistent with the Clean Air Plan, similar to the proposed project, and would result in a significant and adverse impact.

j. Noise

Implementation of this alternative would increase the distance between proposed residences and productive agricultural areas. This increase in distance would reduce potential noise impacts affecting residential areas within the project site. Regarding transportation-related noise, fewer trips would be generated, resulting in a reduction in traffic-related noise in the area; however, this impact may still remain significant and adverse.

k. Aesthetics

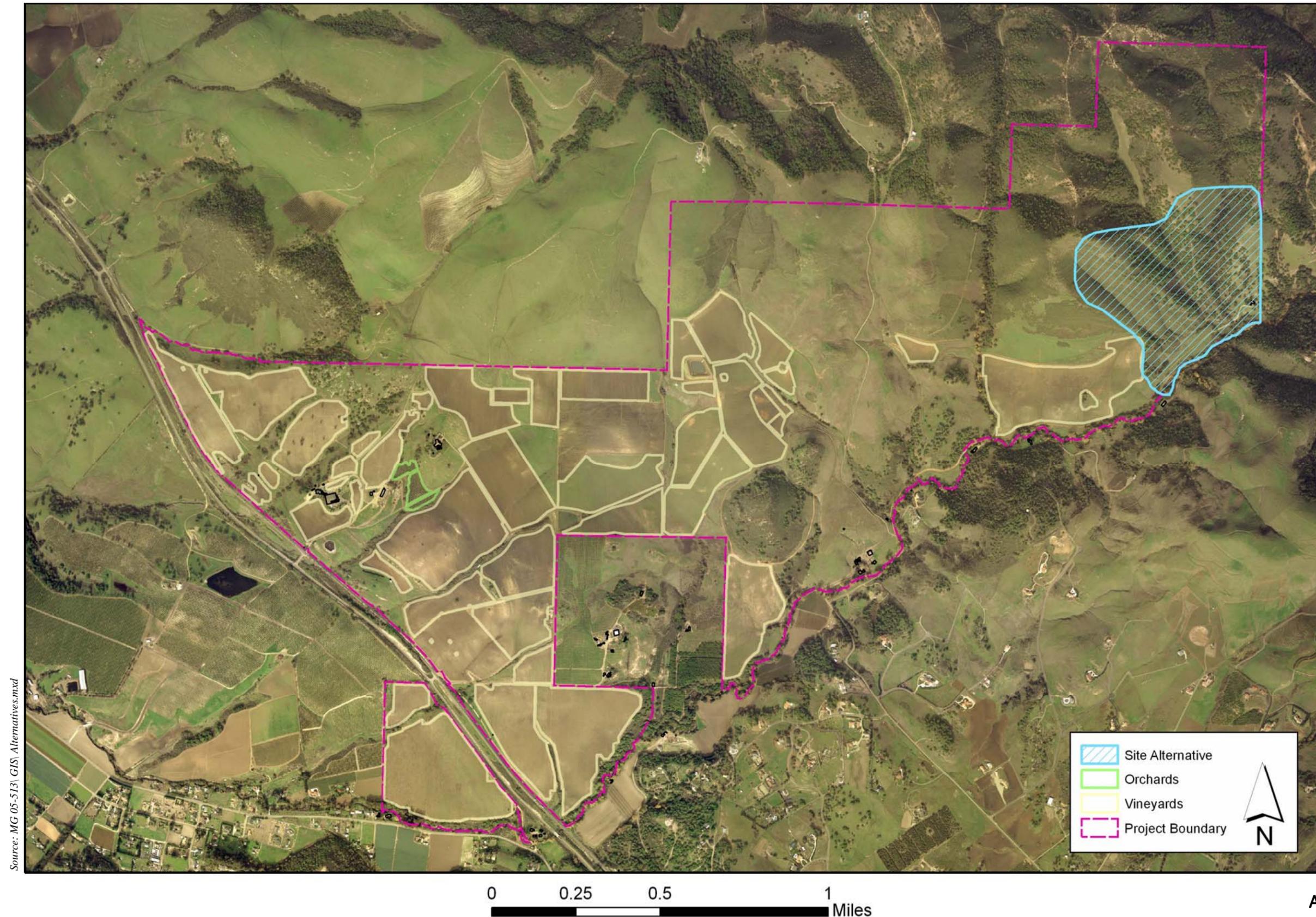
Proposed project elements would be located outside the SRA and Highway Corridor Design Standard areas. It is anticipated that existing topography would provide a backdrop for residential development; however a site specific analysis of project visibility would be required.

l. Wastewater

Based on data obtained during the EIR analysis, it is unlikely that underlying soil characteristics would permit standard or engineered septic or leachfield for entire cluster. The currently proposed location for the treatment plant is over 2.5 miles to the west of the proposed cluster area. A potential location for the facility could be north of the existing vineyards in the eastern corner of the project site. Effluent disposal could occur within the vineyards adjacent to the treatment plant area, and/or through the vineyards and residential common areas.

m. Hazards and Hazardous Materials

The proposed cluster would be located off Upper Los Berros Road, approximately 4.5 miles east of the Highway 101 corridor. CAL FIRE has noted that response time to the western boundary of the project site is approximately ten minutes. Access time to the far eastern portion of the site, and the proposed alternative cluster location, would likely add several minutes to the base response time. Development of secondary access consistent with both CAL FIRE and Caltrans regulations would be necessary to avoid this impact.



Alternative Site
FIGURE VI-3

Back of Figure VI-3

n. Other Issue Areas

Implementation of this alternative would result in recreation and population/housing impacts similar to the proposed project.

7. **Redesigned Project – Incorporation of Tract Design Mitigation Measures**

This alternative incorporates mitigation measures specific to site design modifications (i.e., elimination and/or relocation of lots). This alternative considers the effects of the following:

- Elimination of Lots 13, 14, 46, 68, and 69;
- Elimination of Lots 9 through 17, or reconstruction of roadways to meet CAL FIRE standards;
- Relocation of Lots 11, 12, 27 through 29, and 87 through 105;
- Relocation of building envelopes within Lots 1 through 23, 36 through 38, 41 through 43, and 66 through 85;
- Relocation of Main Road 2 and Access Roads A, B, E, F, and K;
- Relocation of replacement vineyards within environmentally sensitive areas; and,
- Relocation of effluent disposal areas.

a. Water Resources

Elimination of thirteen lots would reduce the overall water demand by approximately 12 percent, and implementation of recommended water conservation measures would further reduce demands for indoor and outdoor water use. Relocation of the proposed effluent disposal area may reduce impacts to groundwater quality by dispersing the recycled water over larger areas, potentially reducing the potential for build-up of salts and other concentrations in the soil and underlying groundwater. Potential impacts would be less than significant.

b. Archaeological Resources

Modifications to the project design, including elimination of lots 13, 14, 68, and 69 and portions of proposed replacement vineyard locations, and relocation of the proposed effluent disposal areas are recommended to avoid significant and adverse impacts. No significant secondary impacts to other resources would occur.

c. Historical Resources

Construction of the proposed ranch headquarters would adversely affect a significant historical complex adjacent to Upper Los Berros Road. Mitigation measures are recommended to minimize this significant impact, including preservation and relocation of significant historical structures and additional documentation of less sensitive structures to be removed. Implementation of these measures would not result in significant secondary impacts to other resources.

d. Agricultural Resources

Modifications to the project design would result in significant adverse impacts to agricultural resources, including increased loss of productive vineyards. Project modifications that would

result in such impacts include: relocation of lots 87 through 105; relocation of building envelopes within lots 1 through 23, 67 through 70, and 70 through 85, and, realignment of Main Road 2 and minor roads A and B.

e. Aesthetics

Modifications to the proposed project design are recommended to avoid significant and adverse impacts to aesthetic resources, including: elimination of lot 46, 68, and 69; relocation of lots 11, 12, 27 through 29, and 87 through 105; relocation of building envelopes within lots 1 through 23, 36 through 38, 41 through 43, and 66 through 85; and, relocation of Main Road 2 and Minor Roads A, B, E, F, and K. Implementation of these measures would result significant secondary impacts to agricultural resources, as described above.

f. Other Issues

Implementation of proposed design changes specific to the subdivision and agricultural cluster would not result in significant secondary impacts to geology and soils, biological resources, paleontological resources, transportation and circulation, air quality, noise, wastewater, recreation, hazards and hazardous materials, public services and utilities, and population and housing.

8. Alternative Access

This alternative is specific to mitigating the significant and unavoidable impact associated with the proposed primary and secondary access roads. As noted in the EIR, the existing at-grade intersection of Laetitia Vineyard Drive and Highway 101 operates at LOS F, and any additional trips would exacerbate this condition. In addition, Caltrans has noted that this intersection's encroachment permit allows for winery and agricultural use, and is not approved for trips generated by residential land uses.

Caltrans has suggested construction of a frontage road parallel to the northbound lanes of Highway 101. The county Public Works Department suggested two options to create adequate primary and secondary access, and avoid the significant and unavoidable impact at the Laetitia Vineyard Drive and Highway 101 intersection: 1) extend Cimmaron Way to the project site and 2) extend Dana Foothill Road to the south across Melschau Creek (Richard Marshall, 2008). It would be feasible to improve existing agricultural roads to extend Main Road 1 to the south near the existing estate residence, past the proposed wastewater treatment facilities, towards the far southern portion of the project site. Connection of this road to an extension of Cimmaron Way would require the construction of bridge crossings over two tributaries to Los Berros Creek, and a bridge crossing over Los Berros Creek. Extension of Cimmaron Way would require consultation and approval by adjacent landowners, and construction of the road through agricultural areas and oak woodland. Extension of Dana Foothill Road would require a bridge crossing over Melschau Creek.

Implementation of this alternative would require the applicant to obtain easements from adjacent property owners, or purchase land for roadway construction. The willingness of these outside parties directly affects the feasibility of this alternative.

a. Geology and Soils

Consideration of this alternative would require additional geotechnical study to identify specific hazards related to new road construction, and the improvement of existing access roads. Potential impacts associated with this alternative would include erosion and down-gradient sedimentation, slope instability, liquefaction, and soil expansion. It is anticipated that such impacts may be mitigated by implementation of intensive site preparation and soil stabilization measures, incorporation of the project engineer's recommendations based on further study, and compliance with all construction regulations.

b. Water Resources

Implementation of this alternative, which is specific to road improvements, would not require the use of water supply, with the exception of dust control measures (i.e., use of water truck or similar methods to control fugitive dust). Potentially significant impacts to water quality may occur, as a result of construction activities within and adjacent to sources of surface water. Discharge of hydrocarbons, construction materials, and sediment may occur; implementation of best management practices and intensive erosion control and site restoration would be necessary to mitigate potential impacts to less than significant.

c. Biological Resources

Proposed on-site roads would require creek crossings at two unnamed tributaries to Los Berros Creek. In addition, the connection to Cimmaron Way would require a major bridge crossing over Los Berros Creek. This crossing would require the removal of dense riparian and oak woodland vegetation. It is unknown whether the site could accommodate a span bridge to avoid impacts to wetland habitat within the bed of the creek. Construction activities would result in potential impacts to special-status species including California red-legged frog and other aquatic species, terrestrial wildlife, and birds which are known to be present within and adjacent to the creek. The extension of Dana Foothill Road would also require a creek crossing, which would result in potential impacts to riparian and wetland habitat, and aquatic species, terrestrial wildlife, and birds within and adjacent to the creek. Implementation of this alternative would require site specific surveys to determine the presence or absence of special-status plant species, quantify affected acreage of oak woodland, riparian, and wetland habitat, and inventory the loss and impacts to mature oak trees. Intensive mitigation measures would be required to mitigate potentially significant impacts. In addition, the applicant would be required to consult with regulatory agencies including the Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Game, and Regional Water Quality Control Board. Implementation of this alternative would result in increased significant impacts to biological resources.

d. Paleontological Resources

Impacts would be similar to the proposed project, and mitigation would be required. Construction activities required for road improvements would be included in the Paleontological Mitigation and Monitoring Plan.

e. Archaeological Resources

Based on surveys conducted on the project site, significant archaeological resources are present. It may be feasible to improve onsite roads outside of the mapped locations of these sites; however further geotechnical analysis would be necessary to determine the appropriate location for a road and bridge crossing near Los Berros Creek. Further archaeological studies would be necessary to determine the presence, absence, and boundaries of any cultural sites within the proposed extensions of Cimmaron Way and Dana Foothill Road.

f. Historical Resources

Implementation of this alternative would not result in road construction within or adjacent to any known historical resource sites. Further study may be necessary to conclude that impacts would be less than significant.

g. Agricultural Resources

Implementation of this alternative would result in additional impacts to agricultural resources by converting existing agricultural roads to residential use, and converting Unique Farmland on the project site to a non-agricultural use. The extension of Cimmaron Way and Dana Foothill Road would primarily affect land designated as Grazing Land; however, productive row crops are present within the flood zone of Los Berros Creek and adjacent to Dana Foothill Road. These productive agricultural areas would be adversely affected by the increased traffic, and potential for disruption of agricultural practices. In addition, the extension of Cimmaron Way would likely result in the loss of productive crop area. Impacts to agricultural resources would be significant.

h. Transportation and Circulation

Implementation of this alternative would avoid the potentially significant and unavoidable impact at the Laetitia Vineyard Drive and Highway 101 intersection. Similar impacts related to existing and anticipated road deficiencies would occur, and road improvements would be necessary. Extending Dana Foothill Road may result in trips affecting Tefft Street; however, trips would be dispersed on Melschau Road and North Thompson Avenue, as well. An expanded traffic study would be necessary to identify the traffic patterns that would occur as a result of the revised circulation system in this area.

i. Air Quality

Implementation of road improvements would result in the generation of air pollutants, including emissions generated by construction equipment and dust generated by ground disturbance. Mitigation measures recommended for construction activities associated with tract development would be required.

j. Noise

Implementation of this alternative would generate construction-related noise. Creation of an alternative transportation route within the area may divert trips and subsequently increase the ambient noise level in affected areas along Cimmaron Way and Dana Foothill Road.

k. Aesthetics

Road construction associated with the proposed extension to Cimmaron Way may result in additional aesthetics impacts due to vegetation removal, road cuts, and pavement visible from Highway 101. Mitigation including revegetation of disturbed soil, landscaping, and rounded cuts would likely be necessary.

l. Hazards and Hazardous Materials

Implementation of this alternative would provide adequate primary and secondary access to the project site. In addition, extending Dana Foothill Road would improve circulation within this area, potentially improving CAL FIRE response time by providing alternative routes for evacuation and emergency vehicles. Implementation of this alternative would avoid the identified significant and unavoidable impact related to the dead-end road length of Los Berros Road and on-site residential roads.

m. Public Services and Utilities

As noted above, implementation of this alternative would improve circulation within this area. This alternative may improve emergency response time; however, due to the presence of additional population within the rural area, the demand for public services and utilities would remain the same as the proposed project.

n. Population and Housing

Implementation of this alternative would provide improved circulation within the area; however, such improvements may result in a growth-inducing effect in the immediate area.

o. Other Issue Areas

Implementation of this alternative would not reduce or increase potential recreation and wastewater impacts.

D. ALTERNATIVES COMPARISON

Table VI-2 summarizes the evaluation of each of the alternatives and was used as a tool to determine which alternatives could avoid or lessen potentially significant impacts associated with the proposed project, and identify which alternative is the Environmentally Superior Alternative. In addition, the matrix also identifies where new or substantially increased potentially significant impacts may be identified for an alternative. Several components of these alternatives can be adapted to work with the proposed project. A combination of alternatives can be incorporated into the proposed project as deemed necessary to reduce the potential impacts.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Section 15126(d) states that the alternatives section of 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...” Section 15126(d)(4) continues by stating “if the

environmental superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

The Reduced Project Single Cluster Alternative is identified as the Environmentally Superior Alternative. Implementation of this alternative would avoid the removal of approximately 100 acres of vineyard by locating lots generally outside of currently productive areas, increase buffer distances between the residential and agricultural land uses, minimize the presence of increased populations within the vineyard, avoid removal of oak trees and minimize impacts to oak woodland, avoid a majority of archaeologically sensitive sites, allow for alternative site design of the ranch headquarters to avoid direct impacts to the historical complex, minimize exposure to unacceptable stationary and agricultural-related noise, and minimize aesthetic impacts. In addition, the residential parcels would be located within the eastern portion of the project site, which would deter residents from using the Laetitia Vineyard Drive / Highway 101 at-grade intersection during a non-emergency. Incorporation of the Effluent Disposal Alternative is specific to the treated effluent disposal area, and should be considered to avoid significant impacts to archaeological resources.

**TABLE VI-2
Impact Comparison of Project Alternatives**

| Significant and Unavoidable Impact | Project | No Project | Reduced Density | Two-Cluster | Single Cluster | Effluent Disposal | Alternative Location | Project w/ Mitigation | Alternative Access |
|--|----------|------------|-----------------|-------------|----------------|-------------------|----------------------|-----------------------|--------------------|
| BIO Impact 3: Oak woodland | 0 | +1 | +1 | +1 | +1 | 0 | -1 | 0 | -1 |
| BIO Impact 7: Los Berros Creek | 0 | 0 | 0 | 0 | 0 | +1 | 0 | 0 | -1 |
| AR Impact 1: Arch. resources | 0 | +1 | +1 | +1 | +1 | +1 | +1 | +1 | -1 |
| AR Impact 9: Cumulative impact | 0 | +1 | +1 | +1 | +1 | +1 | +1 | +1 | 0 |
| AG Impact 1: Farmland conversion | 0 | +1 | +1 | +1 | +1 | 0 | +1 | 0 | -1 |
| AG Impact 2: Land use conflicts | 0 | +1 | +1 | 0 | +1 | 0 | +1 | 0 | -1 |
| AG Impact 4: Cumulative impact | 0 | +1 | +1 | +1 | +1 | 0 | +1 | 0 | -1 |
| TR Impact 4: Highway operations | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TR Impact 10: Secondary access safety | 0 | +1 | 0 | 0 | +1 | 0 | +1 | 0 | +1 |
| TR Impact 13: Sec access cumulative | 0 | +1 | 0 | 0 | +1 | 0 | +1 | 0 | +1 |
| TR Impact 15: Highway cumulative | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| AQ Impact 6: Long-term impact | 0 | +1 | +1 | +1 | +1 | 0 | 0 | 0 | 0 |
| AQ Impact 9: Clean Air Plan | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| AQ Impact 10: Cumulative impact | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| NS Impact 2: Transportation noise | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| NS Impact 3: Stationary noise | 0 | +1 | 0 | 0 | +1 | 0 | +1 | 0 | 0 |
| NS Impact 5: Cumulative impact | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| AES Impact 4: Highway 101 | 0 | +1 | +1 | +1 | +1 | 0 | +1 | +1 | -1 |
| AES Impact 5: SRA/HCD | 0 | +1 | +1 | +1 | +1 | 0 | +1 | +1 | 0 |
| AES Impact 6: Upper Los Berros Rd. | 0 | +1 | +1 | +1 | +1 | 0 | 0 | +1 | 0 |
| AES Impact 18: Cumulative impact | 0 | +1 | +1 | +1 | +1 | 0 | +1 | +1 | 0 |
| HM Impact 2: Dead-end roads | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | +1 |
| PSU Impact 4: Service personnel | 0 | +1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Summary | 0 | 22 | 11 | 10 | 14 | 3 | 10 | 6 | -4 |
| <i>+1 = impact would be less than proposed project</i> <i>-1 = impact would be greater than proposed project</i> <i>0 = impact would remain approximately the same as proposed project</i> | | | | | | | | | |

This page intentionally left blank.