VI. ALTERNATIVES ANALYSIS

Please note that this section replaces the Alternatives Analysis section included in the Draft EIR (2008) and Recirculated Draft EIR (2012). If you submitted comments on this section in response to the Draft EIR (2008) and/or the Recirculated Draft EIR (2012) please be advised that in order for your comments to be addressed in writing in the Final EIR you must either (1) resubmit your comments, as applicable, or (2) prepare and submit new comments in response to this Recirculated EIR (2013).

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 (County). 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). Please note that Table VI-1 includes Class I impacts (not including

secondary impacts), which would occur as a result of the project, based on review of the applicant's proposed changes, including elimination of the equestrian center and modification of proposed domestic wells. Table VI-2 identifies the impacts that were either eliminated or reduced based on these changes or other considerations identified in the table.

TABLE VI-1
Class I Impacts

Impact No.	Description
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 Sensitive Resource Area (SRA) goals and the Highway 101 Corridor Design Standards, resulting in a direct long-term impact.
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.
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.
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.

Impact No.	Description
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.
BIOLOGICAL RESOURCES	
BIO Impact 3	Development of the proposed project would result in the removal of and/or impacts to an estimated 169 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 impacted 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.
HAZARDS AND HAZARDOUS MATERIALS	
HM Impact 2	The proposed project is inconsistent with the California Department of Forestry and Fire Protection (CAL FIRE) requirements for maximum road lengths, which may result in a significant fire hazard.
NOISE	
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.
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.
TRANSPORTATION AND CIRCULATION	
TR Impact 4	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 Level of Service (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.

Impact No.	Description
TR Impact 10	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.
TR Impact 13	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 15	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.

TABLE VI-2
Class I Impacts Avoided or Reduced to Class II by Applicant's Proposed Project Description Changes or Additional Review

Impact No.	Description
AIR QUALITY	
AQ Impact 6	Based on application of the current URBEMIS air quality modeling program, and implementation of recommended mitigation measures, Reactive Organic Gases (ROG), Nitrogen Oxides (NO_x), and PM_{10} long-term operation emissions would not exceed the San Luis Obispo County Air Pollution Control District's (SLOAPCD) Tier II Threshold. Development of the project would not result in a direct long-term impact on air quality. The resulting effect would be significant but mitigable.
BIOLOGICAL RESOURCES	
BIO Impact 7	The originally proposed project (2008) would have resulted in a decrease in water quality and quantity within Los Berros Creek and steelhead critical habitat. The applicant's proposal to use wells located farther from Los Berros Creek, and implementation of recommended mitigation to control use of wells that may result in decreased flow within the creek would address this impact. The resulting effect would be significant but mitigable.
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 (A-weighted decibels) outdoor noise threshold as defined by the Noise Element. However, based on further consideration of this impact, the resulting effect would not be significant because the increase would be 1.2 decibels, which would not be significantly perceptible to the public. Therefore, potential impacts would be less than significant.
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. Upon further evaluation, this impact is not considered cumulatively considerable, because the increase would not be perceptible to the public.

1. Preliminary Alternatives

The following 11 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.

- *Mitigated Project: Applicant Proposed Alternative*. This alternative includes a Mitigated Project proposed by the applicant, which incorporates many of the mitigation measures identified in the 2008 Draft EIR. This alternative includes the same number of residential lots (102), eliminates the equestrian center, modifies the location of recycled water disposal, and incorporates a modified tract map, building envelopes, and access roads to avoid or minimize environmental effects identified in the 2008 Draft EIR.

- *Redesigned Project: Standard Subdivision Alternative*. This alternative considers standard subdivision based on the parcel size allowable pursuant to the County Land Use Ordinance. This alternative would result in up to 118 dwellings, and was rejected from further review, as discussed below.

- *Reduced Project A: Ordinance and General Plan Consistency Alternative*. This alternative considers a reduced density cluster division (56 to 84 residential lots), pursuant to the Land Use Ordinance and the Agriculture and Open Space Element.

- *Reduced Project B: 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, resulting in the development of 75 residential lots.

- *Redesigned Project A: 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. The overall residential density would be reduced by 40 percent, resulting in the development of 60 residential lots.

- *Redesigned Project B: Single Cluster Alternative, 93% Reduction*. This alternative considers a project that includes seven residential lots within a single cluster to concentrate development in one location on the project site. The overall residential density would be reduced by approximately 93 percent.

- *Redesigned Project C: 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 all EIR recommended mitigation measures intended to reduce significant environmental impacts by re-design of the proposed tract map. The residential density would remain the same (102 lots).

- *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 the California Department of Transportation (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 11 preliminary alternatives, the following 10 were brought forward for further review:

1. No Project Alternative
2. Mitigated Project: Applicant Proposed Alternative
3. Reduced Project A: Ordinance and General Plan Consistency Alternative
4. Reduced Project B: Reduced Density Two-Cluster Alternative
5. Redesigned Project A: Single Cluster Alternative
6. Redesigned Project B: Single Cluster Alternative, 93% Reduction
7. Redesigned Project C: Effluent Disposal Alternative
8. Alternative Project Location
9. Proposed Project with Tract Design Mitigation
10. 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 (BMPs) 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. Mitigated Project – Applicant Proposed Alternative

This alternative incorporates mitigation measures specific to site design modifications (i.e., elimination and/or relocation of lots), which were identified in the Draft EIR (2008). This applicant-proposed alternative includes the following changes to the proposed project:

Sub-cluster A

- Realignment of Road A
- Deletion of Roads K and M
- Reconfiguration of Lots 1 through 10 and 16 through 23
- Relocation of Lots 11 through 15
- Application of 25-foot maximum allowable building height for Lots 1 through 23
- Adjustment of agricultural buffers to accommodate new road and lot configuration

Sub-cluster B

- Relocation of Lots 28, 29, 42, and 43
- Reconfiguration of Lot 27, and require 25-foot allowable minimum building height
- Reconfiguration of Lots 24 through 26
- Realignment of Road J
- Delete equestrian center
- Extension of Road I
- Reconfiguration of building envelopes within Lots 36 through 39 (close to Road I), and use of stepped foundations
- Require revegetation of slopes and landscape screening along Road H
- Adjustment of agricultural buffers to accommodate new road and lot configuration

Sub-cluster C

- Relocation of Lots 47 and 48 and reconfiguration of Lot 46
- Revise Road D (driveway to serve Lot 46 and provide access to vineyard)
- Reconfiguration of Lots 49 through 64
- Install 24-hour, 7 days a week, 365 days a year, guardhouse
- Adjustment of agricultural buffers to accommodate revised road and Lot configurations

Sub-cluster D

- Relocation of Lots 68 and 69
- Modification of Road B to an elevation and alignment below the residential lots
- Reconfigure Lots 74 through 85

- Application of 25-foot maximum allowable building height for Lots 66 through 85
- Adjustment of agricultural buffers to accommodate new road and lot configuration

Sub-cluster E

- Application of 25-foot maximum allowable building height for Lots 87 through 91, and Lot 101
- Require revegetation of slopes and landscape screening along Main Road 2 and Roads E and F
- Relocation of water tank and require landscape screening

Ranch Headquarters/HOA Facility

- Retain historic squeeze chute, dairy barn, and milk house

Equestrian Center

- Eliminated from project, and not included in this alternative

Existing Winery

- Construction of retaining wall/sound wall at winery work area

Domestic Recycled Water Re-Use

- Relocation of recycled water re-use area

a. Aesthetics

This alternative incorporates several design recommendations identified in the Draft EIR (2008) to avoid or minimize significant adverse effects to visual resources, including relocation of lots, building envelopes, and roads, and imposing 25-foot maximum height limits in specified areas. Implementation of this alternative would avoid significant adverse impacts associated with the development of Roads A and B, grading and construction of a water tank, construction of residences on Lots 11, 12, and 46 (as shown in the Draft EIR [2008]), and development of Sub-cluster B (Lots 24 through 43). These modifications would avoid significant, adverse, and unavoidable impacts resulting from the development of Sub-clusters A and B (AES Impact 5 and AES Impact 6).

While this alternative would impose a 25-foot height limit, the significant unavoidable impacts resulting from the development of Sub-cluster E (Lots 87 through 105) would remain significant and unavoidable (AES Impact 4). As noted in the EIR analysis, Sub-cluster E occupies the highest elevation on the hillsides, and as a result is the most visible from a distance. The unavoidable visibility of Sub-cluster E on this primary hillside backdrop would greatly contribute to a redefinition of landscape character along the highway corridor. Because of their high visibility, the development of these lots would draw attention and would substantially increase overall awareness of the project for the casual observer. Landscape screening and architectural design measures would not sufficiently disguise the existence of these upper elevation lots nor reduce this noticeability issue. In addition to measures proposed by the applicant, shifting development of these lots below the 660-foot elevation would mitigate this impact to less than significant. This alternative does not include this recommended design modification; therefore, this impact remains significant, adverse, and unavoidable.

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.

b. Agricultural Resources

Modifications to the project design would result in significant adverse impacts to agricultural resources, including increased loss of productive vineyards. Within the Agriculture land use category, 36.5 acres of vineyards would be removed, and within the Rural Lands land use category, 77 acres of vineyards would be removed, resulting in a total loss of 113.5 acres. This calculation includes lot development and proposed buffer zones, access roads, and irrigation ponds. The applicant proposes 118.6 acres of replacement vineyards. Overall, the loss of Farmland, conversion of agricultural land to a non-agricultural use, and the potential creation of land use conflicts would result in significant, adverse, and unavoidable project-specific and cumulative impacts, similar to the proposed project (AG Impact 1, AG Impact 2, and AG Impact 4). Identified mitigation is recommended for this alternative.

c. Air Quality

Implementation of this alternative includes the same number of residential units; therefore, area source and operational emissions would result in the same level of emissions as the proposed project. Based on air quality emission modeling using the current model (URBEMIS 2007 9.2.4), both the proposed project and the applicant's mitigated project would result in operational emissions exceeding 25 pounds per day (lbs/day) for combined Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_x) (35.37 lbs/day combined). During operation, both the proposed project and the mitigated project would not emit more than 25 lbs/day of particulate matter (PM_{10}) or more than 550 lbs/day of carbon monoxide (CO). Similar to the project, this alternative would exceed screening estimates of GHG emissions (over 1,150 metric tons of CO_{2e} (carbon dioxide equivalent) per year. Based on the updated CEQA Handbook, discretionary mitigation measures are required to be implemented, which would also reduce greenhouse gas (GHG) emissions. Elimination of the equestrian center would avoid significant impacts related to odors and dust that would be generated by this facility; however, operation of the wastewater treatment facility would generate odors similar to the project. Similar to the proposed project, potential air quality impacts can be mitigated to less than significant, except as noted below. Operational impacts related to urban development within a rural area, and additional vehicle miles traveled including commuter trips to urban services, would result in a significant and adverse impact due to inconsistency with the Clean Air Plan, similar to the proposed project (AQ Impact 9).

d. Archaeological Resources

Mitigation measures identified in the Draft EIR (2008) included elimination of structural development and effluent disposal within areas known to contain significant archaeological resources. The applicant's proposed modifications to the project design, including relocation of residential lots, reconfiguration of proposed new vineyards, and elimination of the proposed equestrian center, would avoid project-specific and cumulative adverse impacts to identified significant archaeological sites SLO-1317, SLO-2522, SLO-2526, and SLO-2528 (AR Impact 1 and AR Impact 9). In addition, proposed modifications to effluent disposal areas would avoid potential impacts to significant archaeological resources, as identified in AR Impact 3.

Implementation of recommended mitigation measures would reduce identified impacts to less than significant.

e. Biological Resources

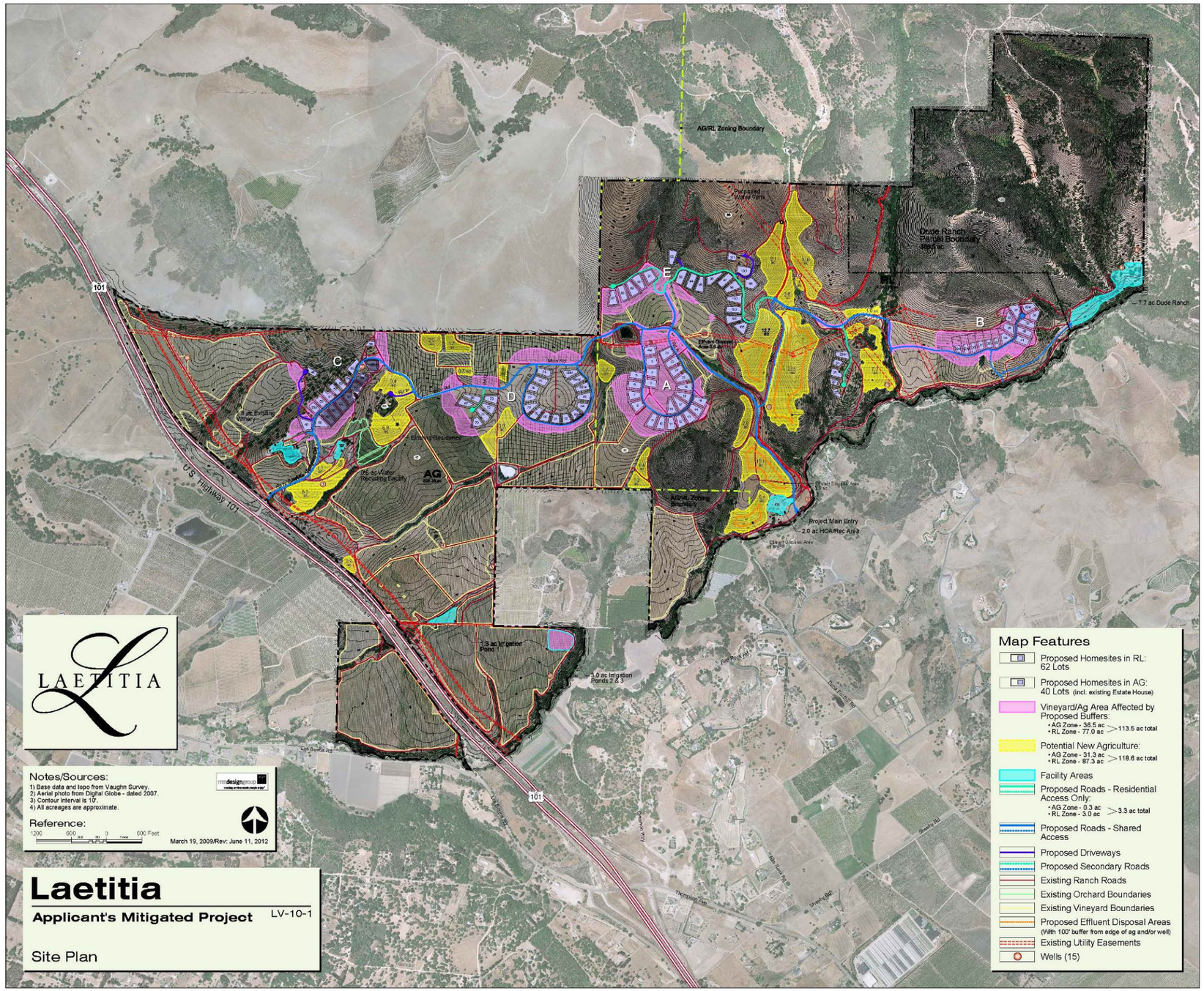
Implementation of this alternative would affect annual grassland, riparian scrub, and coast live oak woodland. Primarily, impacts to biological resources would be limited to grassland habitat. Implementation of this alternative would result in the removal of up to seven oak trees and impacts to up to 56 oak trees, which is a substantial reduction compared to the proposed project. Therefore, potential significant, adverse, and unavoidable impacts to oak woodland (BIO Impact 3) would be reduced to less than significant with mitigation under this alternative.

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). Short and long-term protection and restoration measures and regulatory permits will be required for impacts to sensitive and jurisdictional habitats. Based on implementation of identified mitigation measures, potential impacts would be less than significant.

Similar to the modified project assessed in this recirculated Draft EIR, this alternative would eliminate use of Wells 12 and 13 for domestic use, due to the hydrologic connectivity to Los Berros Creek, the noted reduction in stream flow, and subsequent adverse effect to aquatic species including southern steelhead. This alternative would include the use of Wells 14 and 15, which are located in the northern portion of the property. Based on further hydro-geologic analysis, these wells are not connected to Los Berros Creek and proposed use will not adversely affect stream flow within the creek. Proposed Wells 14 and 15 and an existing buried water line connecting these wells to the vineyard are currently located on the project site. Implementation of this alternative, and use of these wells for domestic use, would require replacement of the existing buried water line. Disturbance would occur within an existing unpaved, rough graded roadway. Mitigation measures identified in the EIR would be necessary to minimize the area of disturbance and avoid adverse and inadvertent effects to oak woodland, special-status species, nesting bird species, wildlife, and water quality.

Based on implementation of mitigation measures, potential impacts to biological resources would be reduced to less than significant under this alternative, with the except of secondary impacts to oak woodland described below.

As discussed under Transportation and Circulation, implementation of this project would generate the same amount of traffic trips, and off-site road improvements would be required. These improvements would include widening and possible bridge and culvert upgrades on Los Berros Road, which may result in the removal of 94 coast live oak trees and 16 sycamore trees (1.8 acres of riparian woodland), which would be a significant, adverse, and unavoidable impact. Additional adverse impacts to riparian and wetland habitat, special-status species, and nesting birds would occur; mitigation would be required addressing potential impacts similar to the proposed project.



Source: RRM Design Group 2012

Mitigated Project Applicant Proposed Alternative
FIGURE VI-1

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f. 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. Similar to the proposed project, identified impacts would be mitigated to less than significant.

g. 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 alternative proposes secondary access onto Highway 101, including a 24/7/365 occupied guard station intended to prevent "non-emergency" use of this secondary access road; however, based on consultation with CAL FIRE, no gate (or an automatic gate) is required to provide adequate secondary access. Furthermore, CAL FIRE recommends that the secondary access be a familiar route. In the event of a fire or other emergency requiring evacuation, residents and occupants must be able to freely exit the development without confusion or obstruction. This proposed alternative would not comply with these standards, due to the lack of adequate secondary access to the project site; therefore, this impact (HM Impact 2) would remain significant and unavoidable.

h. Historic Resources

Construction of the proposed ranch headquarters would adversely affect a significant historical complex adjacent to Upper Los Berros Road. This alternative incorporates 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.

i. Noise

Implementation of this alternative includes the construction of a noise wall near the existing winery, which would partially reduce potential impacts resulting from exposure to stationary noise to less than significant (NS Impact 3). Sensitive residential uses would be exposed to agricultural noise, similar to the proposed project (NS Impact 3), and would result in significant impacts related to land use conflicts, due to the proximity of proposed residential uses adjacent to production agriculture. Implementation of this alternative would generate transportation-related noise impacting offsite residents adjacent to affected roadways, similar to the proposed project. This impact would be considered less than significant, because the increase in noise level would be approximately 1.2 decibels above existing conditions, which would not be significantly perceptible.

j. 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. Similar to the proposed project, potential impacts would be less than significant with mitigation.

k. Public Services and Utilities

Implementation of the proposed project would not reduce the onsite density; therefore, it would result in similar impacts addressed in the Draft EIR (2008). Although increased property taxes from onsite uses would provide revenue for public services, the additional revenue would not adequately address the increased demand for fire and other responder services in the event of an emergency, because it would not readily result in the hiring of additional personnel. Therefore, this alternative would result in a significant, adverse, and unavoidable impact (PSU Impact 4), similar to the proposed project.

l. Transportation and Circulation

Implementation of this alternative would not reduce the number of traffic trips generated by the project, and would result in the same effects as the proposed project, including project-specific and cumulative significant, unavoidable, and adverse impact to Highway 101 southbound and the Highway 101/Los Berros Road/North Thompson Road ramp junctions during the p.m. peak hour (TR Impact 4 and TR Impact 15).

Offsite road improvements would be necessary, similar to the proposed project identified in the Draft EIR (2008), and would result in significant secondary impacts related to the widening of Los Berros Road. Incorporation of a full-time (24/7/365) occupied guard station on Main Road 1 is intended by the applicant to prohibit residential trips using the existing Highway 101/Laetitia Vineyard Drive access location to enter or exit the residential development. Based on consultation with Caltrans, including a joint meeting with the California Department of Forestry and Fire Protection (CAL FIRE) on February 22, 2011, this approach would not guarantee zero additional residential trips generated at this intersection; therefore, this impact would be significant, adverse, and unavoidable, similar to the project identified in the Draft EIR (2008) (TR Impact 10), and would also result in a significant cumulative impact (TR Impact 13) as a result of the continued degradation of the intersection.

m. Water Resources

Elimination of the equestrian center from the 2008 proposed project reduced project water demand by 4.4 acre feet per year (afy), or approximately one percent. Incorporation of water conservation measures identified in the Draft EIR (2008) and strict limitations on landscaped area further reduces demands for indoor and outdoor water use, for an estimated annual demand of 46.3 afy (a 64 percent reduction from the originally proposed project). Similar to the proposed project, mitigation measures are necessary to ensure that use of proposed wells does not exceed recommended sustainable yields or have an adverse effect on streamflow within Los Berros Creek. Based on implementation of recommended mitigation measures, potential impacts would be less than significant. Identified mitigation includes upgrading the wastewater treatment facility to produce 37 afy of tertiary treated water to be used for irrigation. Spreading out the proposed disposal area would contribute to a reduction in irrigation water demand and reduce the potential for build-up of salts and other concentrations in the soil and underlying groundwater. Potential impacts would be less than significant.

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 measures, BMPs, LID strategies, and a Stormwater Pollution Prevention Plan (SWPPP). Based on implementation of recommended mitigation, potential impacts would be less than significant.

n. Other Issue Areas

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

3. Reduced Project A – 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 acres of irrigated crops / 20 acres per parcel = 31 parcels
- 894 acres of grazing land / 320 acres per parcel = 2 parcels

This would allow 66 parcels (33 lots × 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) 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:

- 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 50 parcels (25 lots × 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) 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 ranch headquarters would not be considered an allowable use, 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 acres / 40 = 15 × 2 = 30 parcels
- Applying the 160-acre minimum parcel size to Class III/IV non-irrigated areas results in the following calculation: approximately 230 acres / 160 = 1.4 × 2 -= 2 parcels
- Applying the 320-acre minimum parcel size to Class VI – VIII non-irrigated areas results in the following calculation: approximately 664 acres / 320 = 2 × 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 acres / 40 acres per parcel = 12 × 2 = 24 parcels
- Applying the 160-acre minimum parcel size to non-irrigated areas results in the following calculation: approximately 341 acres / 160 = 2 × 2 = 4 parcels

b. 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 Sensitive Resource Area (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.

c. 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.

d. 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.

e. 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. 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.

f. 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, Los Berros Creek, and oak and riparian woodland 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.

g. 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.

h. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project. The California Department of Forestry and Fire Protection (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.

i. Historic 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.

j. 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 offsite residents adjacent to affected roadways, similar to the proposed project.

k. 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.

l. Public Services and Utilities

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

m. 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.

n. 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, BMPs, LID strategies, and a SWPPP.

o. Other Issue Areas

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

4. Reduced Project B – 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 VI-2). The project area identified in the graphic is conceptual only. 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.

a. 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. Based on implementation of identified mitigation, potential impacts would be reduced to less than significant, including identified Class I impacts (AES Impact 4, AES Impact 5, and AES Impact 6).

b. 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 would be reduced, but would remain significant and adverse due to inadequate buffers and potential land use conflicts (AG Impact 2).

c. 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. Mitigation would be required, which would reduce potential short-term impacts to less than significant. 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. This impact would remain significant, adverse, and unavoidable (AQ Impact 9).

d. 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.

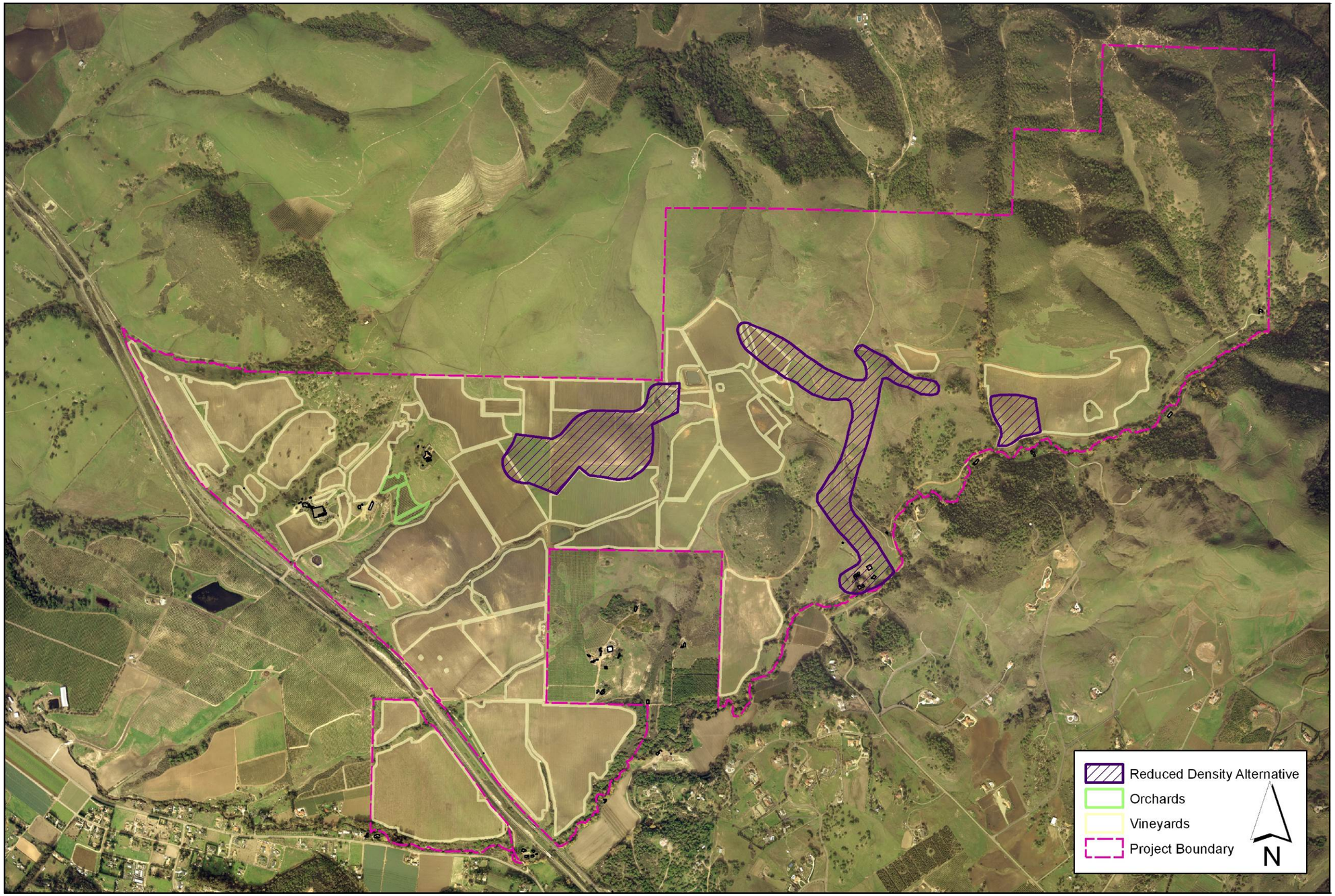
e. Biological Resources

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. Potential impacts would be mitigated to less than significant.

Implementation of this alternative may require widening and possible bridge and culvert upgrades on Los Berros Road, which may result in the removal of 94 coast live oak trees and 16 sycamore trees (1.8 acres of riparian woodland), which would be a significant, adverse, and unavoidable impact. Additional adverse impacts to riparian and wetland habitat, special-status species, and nesting birds would occur; mitigation would be required addressing potential impacts similar to the proposed project.

f. 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. Potential impacts would be mitigated to less than significant.



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Reduced Project B – Reduced Density Alternative
FIGURE VI-2

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g. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project (HM Impact 2). 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, and would result in a significant, adverse, and unavoidable impact.

h. Historic 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. Potential impacts would be mitigated to less than significant.

i. 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, this impact would remain significant, adverse, and unavoidable (NS Impact 3). Implementation of this alternative may generate transportation-related noise impacting offsite residents adjacent to affected roadways. Similar to the proposed project, this impact would be less than significant, because the increase in noise level would not be significantly perceptible.

j. 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. Potential impacts would be mitigated to less than significant.

k. Public Services and Utilities

Implementation of the proposed project would reduce the onsite density by 26 percent, which would reduce the demand for emergency services personnel. Although increased property taxes from onsite uses would provide revenue for public services, the additional revenue would not adequately address the increased demand for fire and other responder services in the event of an emergency, because it would not readily result in the hiring of additional personnel. Therefore, this alternative would result in a significant, adverse, and unavoidable impact (PSU Impact 4), similar to the proposed project.

l. 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. Further quantified modeling would be necessary to determine if potential impacts to the Highway 101 ramps would be mitigated to less than significant (TR Impact 4 and TR Impact 15). This alternative would not eliminate significant impacts TR Impact 10 and 13 because emergency access would not comply with Caltrans requirements to prohibit any new residential trips from Laetitia Vineyard Drive.

m. 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, BMPs, LID strategies, and a SWPPP. Potential impacts would be mitigated to less than significant.

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 A – 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-3). The project area identified in the figure is conceptual only. Approximately 10 acres of vineyard would be removed to accommodate the development, including buffer zones; however this would be a 90 percent reduction from the project as proposed.

a. Aesthetics

Implementation of this alternative would avoid or minimize project-related significant and adverse impacts to aesthetic resources (AES Impact 4, AES Impact 5, and AES Impact 6). 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. Based on implementation of mitigation measures, significant impacts would be less than significant.

b. 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 (AG Impact 2). 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 permanent conversion of Farmland to non-agricultural use would be substantially reduced; however, the impact may still be significant and unavoidable (AG Impact 1).

c. 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 (AQ Impact 9).

d. Archaeological Resources

Based on archaeological surveys conducted for the EIR, no archaeological sites are located within the proposed alternative residential cluster area. Therefore, all significant impacts would be avoided.

e. 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. Potential impacts would be mitigated to less than significant, including BIO Impact 3 (Class I impact due to the significant loss of oak woodland). Implementation of this alternative would result in similar significant secondary impacts to oak woodland habitat along Los Berros Creek.

f. 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. Potential impacts would be mitigated to less than significant.

g. Hazards/Hazardous Materials

Implementation of this alternative would result in similar impacts as the proposed project (HM Impact 2). 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.

h. Historic 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. Potential impacts would be mitigated to less than significant.

i. Noise

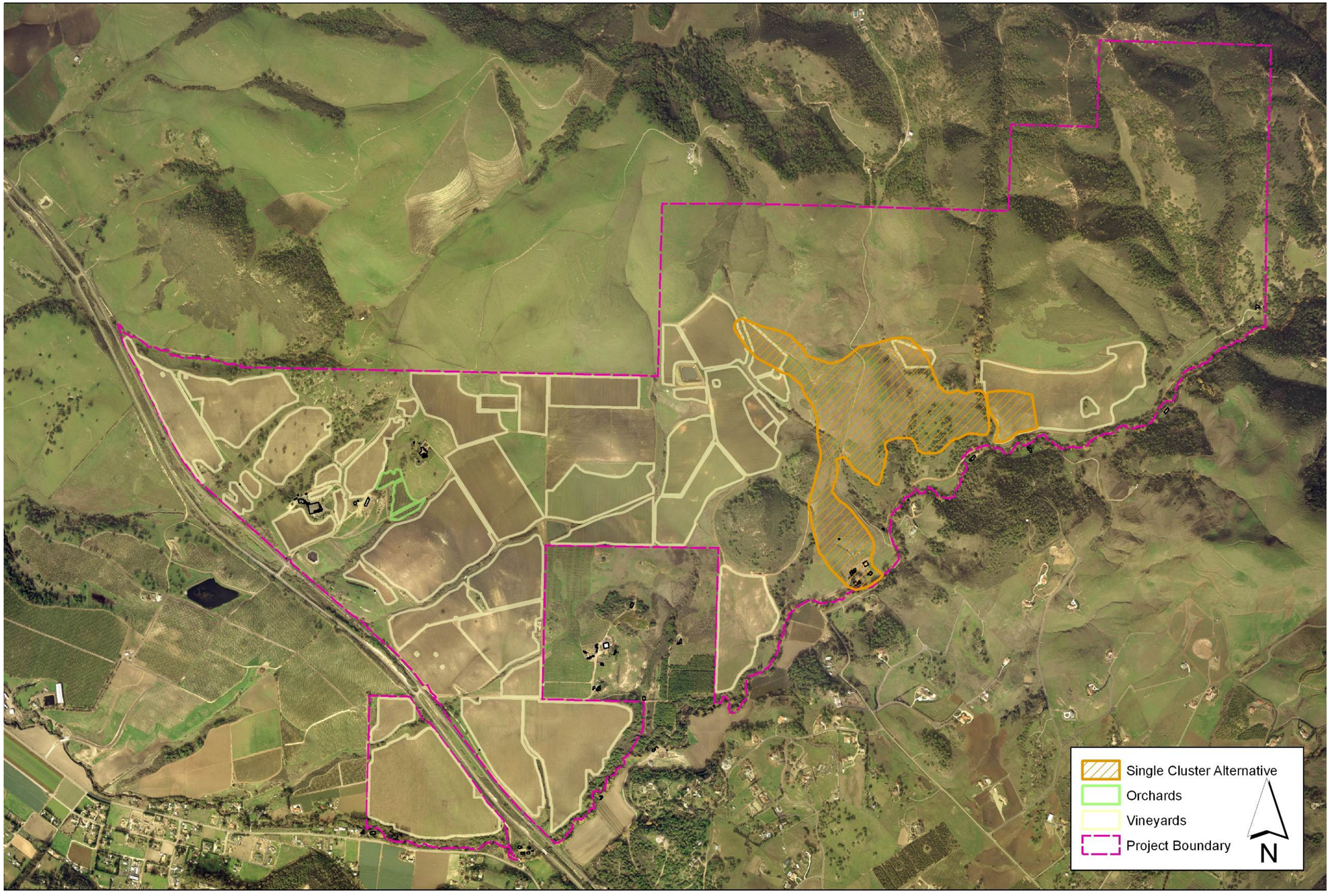
Implementation of this alternative would reduce potential impacts resulting from exposure to stationary and agricultural related noise. Lots would not be located adjacent to the winery, which would avoid the noise impact resulting from stationary noise generated during the peak crush season. Impacts 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, this impact would remain significant, adverse, and unavoidable (NS Impact 3). Implementation of this alternative would generate transportation-related noise impacting offsite residents adjacent to affected roadways. Similar to the proposed project, this impact would be less than significant, because the increase in noise level would not be significantly perceptible.

j. 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. Potential impacts would be mitigated to less than significant.

k. Public Services and Utilities

Implementation of the proposed project would reduce the onsite density by approximately 40 percent, which would reduce the demand for emergency services personnel. Although increased property taxes from onsite uses would provide revenue for public services, the additional revenue would not adequately address the increased demand for fire and other responder services in the event of an emergency, because it would not readily result in the hiring of additional personnel. Therefore, this alternative would result in a significant, adverse, and unavoidable impact (PSU Impact 4), similar to the proposed project.



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Redesigned Project A - Single Cluster Alternative
FIGURE VI-3

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l. 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, and whether this alternative would result in a significant, adverse, and unavoidable impact on Highway 101 and associated ramps (TR Impact 4 and TR Impact 15). 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 (TR Impact 10 and TR Impact 13).

m. 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, which would reduce potential impacts to less than significant.

n. Other Issue Areas

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

6. Redesigned Project B – Single Cluster Alternative, 93% Reduction

This alternative proposes clustering seven residential lots within a single location on the project site, within the Rural Lands land use category. This alternative does not include an equestrian center, homeowner's association/ranch headquarters complex, community wastewater treatment facility, or recycled water re-use. The development would be served by a community water system. Each lot would be served by a standard septic system. Proposed lots would be one acre in size (actual size may depend on site specific percolation tests to verify consistency with the Basin Plan). Residential density would be reduced by approximately 93 percent, compared with the proposed project. Clustered residential parcels would be located within approximately seven acres in the Rural Lands land use category, in the approximate location of Lots 24 – 29, Sub-cluster B. No vineyards would be removed to accommodate residential development, including buffer zones, access roads, and infrastructure.

a. 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. Implementation of this alternative would avoid significant

and adverse impacts AES Impact 4, AES Impact 5, and AES Impact 6. All impacts would be mitigated to less than significant.

b. Agricultural Resources

Implementation of this alternative would avoid the removal of vineyard by locating lots 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, and limitation of residential (or mixed use) access roads. Potentially significant impacts to agricultural resources would be mitigated to less than significant, including avoidance of significant and adverse impacts AG Impact 1 and AG Impact 2.

c. Air Quality

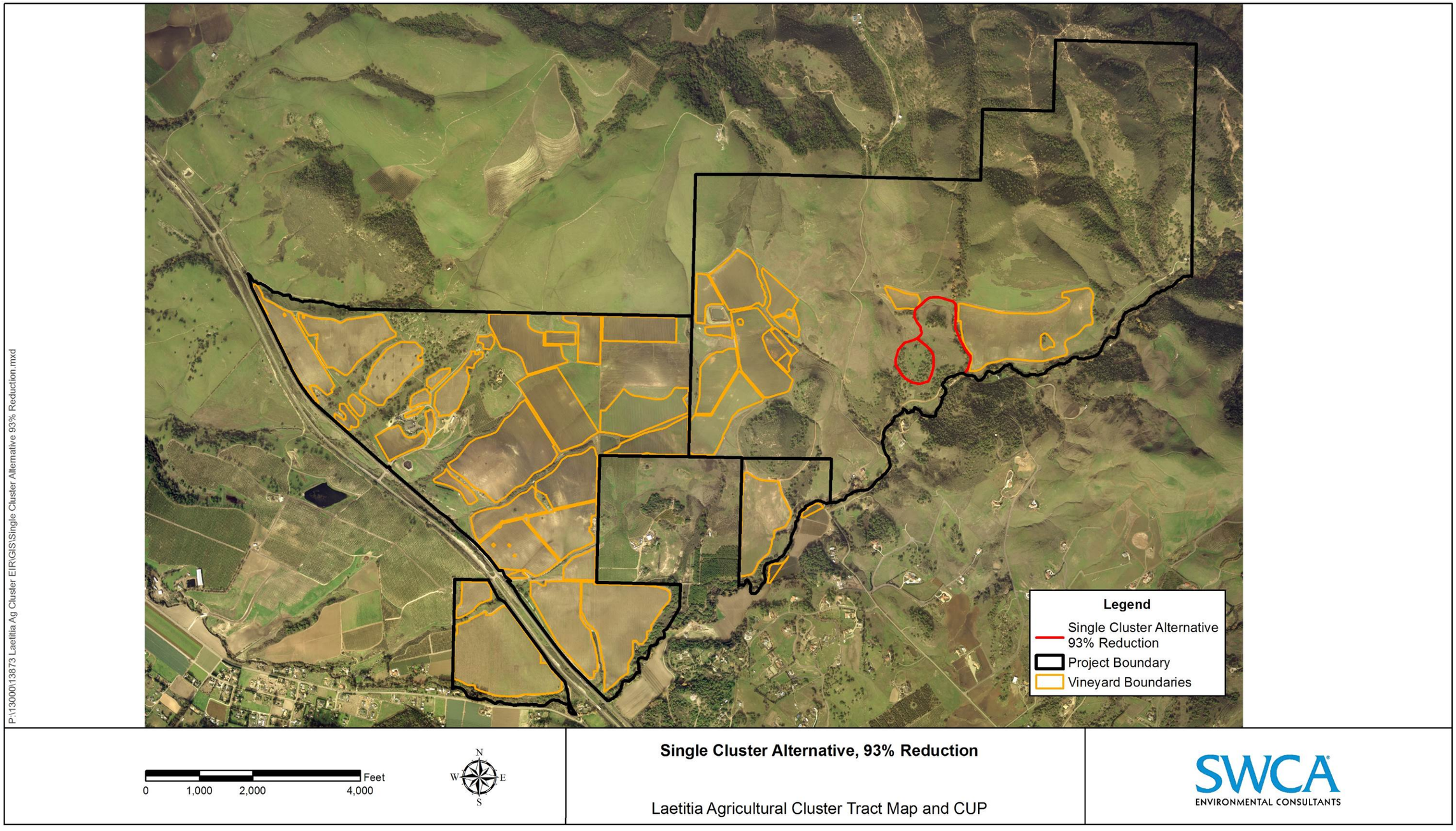
Implementation of this alternative would require substantially less acreage of disturbance compared to the proposed project. The size of the project would generate fewer emission concentrations during the construction phase. Operational impacts related to traffic trips, including commuter trips to urban services, would be less than significant. This alternative would be inconsistent with the Clean Air Plan; however, due to the substantial reduction in residences, the resulting impact is less than significant.

d. Archaeological Resources

Based on archaeological surveys conducted for the EIR, no archaeological sites are located within the proposed alternative residential cluster area or access road. All potentially significant impacts to archaeological resources would be avoided.

e. Biological Resources

Habitats located within the proposed alternative cluster area and associated infrastructure includes annual grassland, coast live oak woodland, and riparian scrub. Lot development could be concentrated within annual grassland and oak woodland habitats, which would be affected by lot development and fuel management. Implementation of this alternative would require the removal of two coast live oak trees, and would impact seven trees within 30 feet of the building envelope and up to 13 trees between 30 and 100 feet from the edge of the building envelope. The access road traverses Drainage E, and would be directly affected by road improvements. 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. Significant and adverse impact BIO Impact 3 (impacts to oak woodland) would be avoided, and all other potential impacts would be mitigated to less than significant.



Redesigned Project B – Single Cluster Alternative, 93% Reduction
FIGURE VI-4

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f. Geology and Soils

Implementation of this alternative would require grading and site disturbance, which has the potential to result in erosion and down-gradient sedimentation. 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. Potential impacts would be mitigated to less than significant.

g. 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, resulting in a similar significant, adverse, and unavoidable impact (HM Impact 2).

h. Historic Resources

Implementation of this alternative would not include a homeowner's association/ranch headquarters facility. The historic complex would not be affected by this alternative. All potentially significant impacts to Historic Resources would be avoided.

i. 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 would be avoided, due to the approximately 500-foot buffer between proposed residential uses and production agriculture. Implementation of this alternative would generate transportation-related noise; however, the limited number of trips would not generate noise exceeding current levels. Potential adverse impact NS Impact 3 would be avoided, and all other impacts would be mitigated to less than significant.

j. 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. Potential impacts would be mitigated to less than significant.

k. Public Services and Utilities

Implementation of the proposed project would substantially reduce the onsite density, which would reduce the demand for emergency services personnel. Due to the significant reduction in additional residences, this alternative would avoid significant and adverse impact PSU Impact 4.

l. Transportation and Circulation

Implementation of this alternative would result in a significant reduction in traffic trips generated by the project. Assuming seven residences, the average daily trip generation would be 67 trips

per day. Based on preliminary review, the project would not require offsite road improvements, including the widening of Upper Los Berros Road and improvements to the Highway 101/North Thompson/Los Berros Road interchange, and would not result in project specific (TR Impact 4), cumulative (TR Impact 15) or secondary significant adverse impacts. Further quantitative analysis would be required to determine the extent of warranted road improvements. 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.

m. Wastewater

This alternative would not include a community wastewater collection and treatment system, or onsite disposal of recycled wastewater. Based on a *Percolation Feasibility Evaluation* (GeoSolutions, Inc., 2004) conducted for the project site, the average percolation rate within the general area ranged from 42 to 56 minutes per inch. Implementation of this alternative would require further percolation tests and soil borings to demonstrate compliance with the Building Code and Basin Plan. At a minimum, an engineered system would be required for these residential lots. It is anticipated that impacts can be mitigated to less than significant.

n. Water Resources

Implementation of this alternative would significantly reduce water demands, due to a substantial reduction in residential density. Similar to the proposed project, water conservation methods are recommended 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 substantially decreased area of effect, the potential for increased runoff and discharge of sediments would be significantly reduced. Mitigation measures would be required, similar to the proposed project, which would reduce potential impacts to less than significant.

o. Other Issue Areas

Implementation of this alternative would result in less than significant impacts to recreation and population/housing, due to the substantial reduction in residential density.

7. Redesigned Project C – Effluent Disposal Alternative

This alternative does not include any changes to the proposed project aside from alternative disposal sites for wastewater. This option was included in the Applicant's Mitigated Project following public review of the 2008 Draft EIR. 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. 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.

b. Agricultural Resources

Implementation of this alternative would likely reduce the potentially adverse effects to agricultural resources (AG Impact 3) 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.

c. 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 RWQCB standards for treated effluent disposal.

d. 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.

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.

8. 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. Based on the lack of more detailed information regarding development potential of this alternative location, and need for further study, impact assessment is qualitative.

a. 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.

b. 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.

c. 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.

d. 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.

e. 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.

f. Hazards and Hazardous Materials

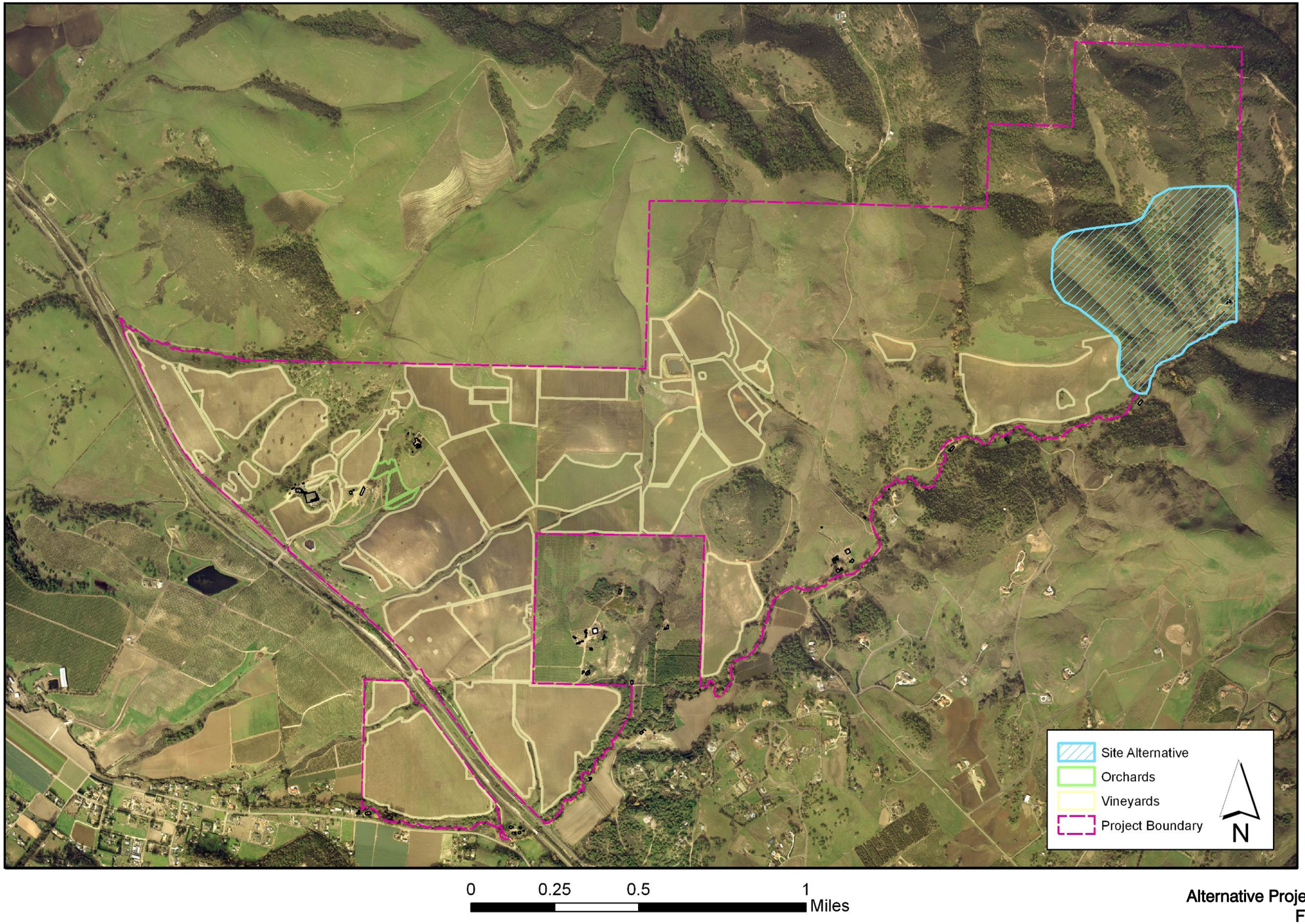
The proposed cluster would be located off Upper Los Berros Road, approximately 4.5 miles east of the Highway 101 corridor. CAL FIRE has noted that response time to the western boundary of the project site is approximately ten minutes. Access time to the far eastern portion of the site, and the proposed 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.

g. Historic Resources

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

h. 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.



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

Alternative Project Location
FIGURE VI-5

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i. 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.

j. 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 offsite 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. Implementation of this alternative may require widening and possible bridge and culvert upgrades on Los Berros Road, which may result in the removal of 94 coast live oak trees and 16 sycamore trees (1.8 acres of riparian woodland), which would be a significant, adverse, and unavoidable impact. Additional adverse impacts to riparian and wetland habitat, special-status species, and nesting birds would occur.

k. 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.

l. 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.

m. Other Issue Areas

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

9. Proposed Project with Tract Design Mitigation

This alternative incorporates mitigation measures specific to site design modifications identified in the project analysis (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.

As discussed in the project-specific analysis, implementation of these measures would avoid or minimize all impacts to aesthetics and archaeological resources. Potential impacts to air quality, agriculture, biological resources, hazards/hazardous materials, noise, public services and utilities, transportation and circulation would remain significant, adverse, and unavoidable, similar to the proposed project. The sections below discuss the additional, secondary impacts that would occur as a result of the recommended tract design changes. Implementation of this alternative assumes incorporation of all other identified mitigation measures.

a. 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 in significant secondary impacts to agricultural resources, as described above.

b. Agricultural Resources

Modifications to the project design would result in significant, adverse, and unavoidable 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.

c. 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.

d. Historic 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.

e. 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.

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. Other potential impacts would be similar to the residual impacts determination identified in the project-specific analysis, and mitigation would be required.

10. Alternative Access Alternative

This alternative is specific to mitigating the significant and unavoidable impact associated with the proposed primary and secondary access roads. No other changes to the project, as proposed, are included in this Alternative. 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 access 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. Based on the lack of more detailed information regarding development potential of this alternative location, and need for further study, impact assessment is qualitative and determination of impact significance is not specifically identified or included in Table VI-3.

a. 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.

b. 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.

c. 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.

d. 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.

e. Biological Resources

Proposed onsite 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 ACOE, USFWS, CDFG, and RWQCB. Implementation of this alternative would result in increased significant impacts to biological resources.

f. 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.

g. 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 onsite residential roads.

h. Historic 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.

i. 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.

j. 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.

k. 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.

l. 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.

m. 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.

n. 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 BMPs and intensive erosion control and site restoration would be necessary to mitigate potential impacts to less than significant.

o. Other Issue Areas

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

D. ALTERNATIVES COMPARISON

Table VI-3 summarizes the evaluation of each of the tract design 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. Table VI-3 includes secondary impacts, as noted, in order to differentiate when significant secondary impacts would occur under each alternative, in addition to project-specific impacts. The table does not include the Alternative Access option, because additional study would be necessary to determine the significance of potential impacts, including but not limited to, agricultural resources, archaeological resources, biological resources, and transportation and circulation.

TABLE VI-3
Impact Comparison of Project Tract Design Alternatives

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
AES Impact 1: Visible earthwork, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AES Impact 2: Exterior colors, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AES Impact 3: Visible light, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AES Impact 4: Change in visual character as seen from Hwy 101	Class I	No Impact	Class I	Class II	Class II	Class II	No Impact	Class I	Class III	Class II
AES Impact 5: Hwy 101 SRA/HCD, sub-cluster A	Class I	No Impact	Class II	Class II	No Impact	No Impact	No Impact	Class I	No Impact	Class II
AES Impact 6: Visual character, Los Berros Road, sub-cluster B	Class I	No Impact	Class II	Class II	Class II	Class II	Class II	Class I	No Impact	Class II
AES Impact 7: Ranch Headquarters, Loss of Rural Character	Class III	No Impact	Class III	Class III	Class III	Class III	No Impact	Class III	No Impact	Class II
AES Impact 8: Equestrian Center (no longer applicable)	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
AES Impact 9: Visual character, Hwy 101, sub-cluster D	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	No Impact	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
AES Impact 10: Visual character, WWTF building	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	Class II	Class II
AES Impact 17: Visual character, dude ranch, Los Berros Road	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AES Impact 18: Hwy 101, cumulative	Class I	No Impact	Class I	Class I	Class II	Class II	Class III	Class I	Class III	Class I
AG Impact 1: Farmland conversion, project-wide	Class I	No Impact	Class I	Class I	Class I	Class I	Class II	Class I	Class III	Class I
AG Impact 2: Land use conflicts, project-wide	Class I	No Impact	Class I	Class I	Class I	Class II	Class II	Class I	Class II	Class I
AG Impact 3: Over-saturation from effluent disposal	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class II	Class II
AG Impact 4: Farmland conversion, cumulative	Class I	No Impact	Class I	Class I	Class I	Class II	Class III	Class I	Class III	Class I
AQ Impact 1: Short-term ROG and NO_x	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 2: Short-term and long-term, PM_{10}	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 3: Short-term, demolition, hazardous pollutants	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 4: Short-term, residential burning	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
AQ Impact 5: Short-term, naturally-occurring asbestos	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 6: Long-term, ROG, NO_x, PM_{10}, GHG	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 7: Generation of odors	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
AQ Impact 8: Dust, equestrian center (no longer applicable)	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact	No Impact
AQ Impact 9: Inconsistent with Clean Air Plan	Class I	No Impact	Class I	Class I	Class I	Class I	Class II	Class I	Class I	Class I
AQ Impact 10: Cumulative impact	Class I	No Impact	Class I	Class I	Class I	Class I	Class III	Class I	Class II	Class I
AR Impact 1: Direct impacts, archaeological, project-wide	Class I	No Impact	Class II	Class II	Class II	No Impact	No Impact	Class I	Class III	Class II
AR Impact 2: Direct impacts, archaeological, project-wide	Class II	No Impact	Class II	Class II	Class II	No Impact	No Impact	Class II	Class III	Class II
AR Impact 3: Direct impacts, archaeological, WWTF	Class II	No Impact	Class II	Class II	Class II	No Impact	No Impact	Class II	Class II	Class II
AR Impact 4: Indirect impacts, archaeological, project-wide	Class II	No Impact	Class II	Class II	Class II	No Impact	No Impact	Class II	Class III	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
AR Impact 5: Indirect impacts, archaeological, new agriculture	Class II	No Impact	Class II	Class II	Class II	No Impact	No Impact	Class II	No Impact	Class II
AR Impact 6: New discovery, archaeological, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	No Impact	Class II
AR Impact 7: New discovery, archaeological, WWTF ponds	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	Class II	Class II
AR Impact 8: New discovery, archaeological, new agriculture	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	No Impact	Class II
AR Impact 9: Cumulative impacts	Class I	No Impact	Class II	Class II	Class II	Class III	Class III	Class I	Class III	Class III
BIO Impact 1: Direct impact, riparian/wetland habitat, roads	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 2: Indirect impacts, riparian/wetland, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 3: Direct impacts, oak trees/woodland, project-wide	Class I	No Impact	Class II	Class I	Class II	Class II	Class II	Class I	Class I / II	Class II
BIO Impact 4: Direct impacts, natural communities, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
BIO Impact 5: Nesting birds, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 6: California red-legged frog, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 7: Steelhead, critical habitat, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 8: Sensitive habitat and species, replacement vineyards	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	No Impact	Class II
BIO Impact 9: Erosion, aquatic habitat, replacement vineyards	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	No Impact	Class II
BIO Impact 10: Sensitive habitats/species, dude ranch	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
BIO Impact 11: Native communities/species, cumulative	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class II	Class II
GEO Impact 1: Landslides, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class III	Class II
GEO Impact 2: Site alteration, slope stability, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
GEO Impact 3: Expansive soils, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
GEO Impact 4: Radon gas, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
GEO Impact 5: Groundshaking, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
GEO Impact 6: Seismically-induced slope failure, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
HM Impact 1: Hazardous materials, WWTF	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
HM Impact 2: Fire hazard, dead-end road length, project-wide	Class I	No Impact	Class I	Class I	Class I	Class I	Class I	Class I	Class I	Class I
HM Impact 2, Secondary Impact: See TR Impact 10	See TR Impact 10	No Impact	See TR Impact 10	See TR Impact 10	See TR Impact 10	See TR Impact 10	See TR Impact 10	See TR Impact 10	See TR Impact 10	See TR Impact 10
HM Impact 3: Fire hazard, dude ranch	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
HR Impact 1: Demo/removal of historic structures, Ranch HQ	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	No Impact	Class II
HR Impact 2: Loss of integrity/setting, Ranch HQ	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	No Impact	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
HR Impact 3: Impacts to remaining buildings	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
NS Impact 1: Short-term construction impacts, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
NS Impact 2: Transportation noise, N. Thompson Road	Class III	No Impact	Class III	Class III	Class III	Class III	Class III	Class III	Class III	Class III
NS Impact 3: Stationary noise, exposure to agricultural noise	Class I	No Impact	Class I partially mitigated	Class I	Class I	Class I	Class III	Class I	Class II	Class I
NS Impact 4: Stationary noise, amplified sound, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
NS Impact 5: Transportation noise, cumulative impact	Class III	No Impact	Class III	Class III	Class III	Class III	Class III	Class III	Class III	Class III
PR Impact 1: Earthwork, paleontological, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
PSU Impact 1: Emergency services, defensible space, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
PSU Impact 2: Schools, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
PSU Impact 3: Solid waste, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
PSU Impact 4: Emergency services, cumulative	Class I	No Impact	Class I	Class I	Class I	Class I	Class II	Class I	Class I	Class I
REC Impact 1: Increased demand, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
REC Impact 1, Secondary Impact: Biological habitats	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
REC Impact 1, Secondary Impact: Archaeological resources	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
REC Impact 1, Secondary Impact: Agricultural resources, vineyards	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
REC Impact 2: Recreation, cumulative impacts	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 1: Hwy 101 NB Ramps/N. Thompson Rd, off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class II	Class II
TR Impact 2: Sheehy Rd/N. Thompson Rd, off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 3: Sheehy Rd./N. Dana Foothill Rd., off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
TR Impact 4: 101/Los Berros Rd./N. Thompson Rd., off-site	Class I	No Impact	Class I	Class I	Class I	Class I	Class III	Class I	Class I / II	Class I
TR Impact 5: Lack of pedestrian access, on-site	Class III	No Impact	Class III	Class III	Class III	Class III	Class III	Class III	Class III	Class III
TR Impact 5, Secondary Impact: Agricultural resources, see AG Impact 2	See AG Impact 2	No Impact	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2
TR Impact 6: Lack of bicycling facilities, on-site	Class III	No Impact	Class III	Class III	Class III	Class III	Class III	Class III	Class III	Class III
TR Impact 6, Secondary Impact: Agricultural resources, see AG Impact 2	See AG Impact 2	No Impact	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2	See AG Impact 2
TR Impact 7: Sheehy Road, shoulders, off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 7, Secondary Impacts: Habitat, species	See BIO Impacts 1, 2, & 3	No Impact	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3
TR Impact 8: N. Dana Foothill Rd., shoulders/striping, off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 8, Secondary Impacts: Habitat, species	See BIO Impacts 1, 2, & 3	No Impact	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
TR Impact 9: Upper Los Berros Road, paving, striping, off-site	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class II	Class II
TR Impact 9, Secondary Impacts: Archaeological resources	Class II	No Impact	Class II	Class II	Class II	Class II	No Impact	Class II	Class II	Class II
TR Impact 9, Secondary Impacts: Wetland/riparian habitat, special-status species	See BIO Impacts 1, 2, & 3	No Impact	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	No Impact	See BIO Impacts 1, 2, & 3	See BIO Impacts 1, 2, & 3	Class II
TR Impact 9, Secondary Impacts: Oak woodland, riparian forest	Class I	No Impact	Class I	Class I	Class I	Class I	No Impact	Class I	Class I	Class I
TR Impact 10: Laetitia Vineyard Drive, access control	Class I	No Impact	Class I	Class I	Class I	Class I	Class II	Class I	Class II	Class I
TR Impact 11: Internal circulation, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 12: Internal parking, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
TR Impact 13: Secondary access, cumulative	Class I	No Impact	Class I	Class I	Class I	Class I	Class II	Class I	Class II	Class I
TR Impact 14: 101 NB ramps, N. Thompson Rd., cumulative	Class II	No Impact	Class II	Class II	Class II	Class II	Class III	Class II	Class II	Class II
TR Impact 15: 101/Los Berros Rd./N. Thompson Rd, cumulative	Class I	No Impact	Class I	Class I	Class I	Class I	Class III	Class I	Class I / II	Class I

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
WW Impact 1: Discharge into Los Berros Creek, WWTF	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WW Impact 2: Equipment damage due to agricultural activities	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WW Impact 3: Excess effluent runoff	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WW Impact 3, Secondary Impact: Biological Resources	See WAT Impact 5	No Impact	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5	See WAT Impact 5
WW Impact 3, Secondary Impact: Archaeological Resources	See AR Impact 3	No Impact	See AR Impact 3	See AR Impact 3	See AR Impact 3	See AR Impact 3	See AR Impact 3	See AR Impact 4	See AR Impact 4	See AR Impact 3
WW Impact 4: Salt-loading	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class III	Class II
WW Impact 5: Long-term maintenance/repair	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 1: Over-pumping groundwater, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 2: Stormwater discharge, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 3: Water quality, construction, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II

Impact	Project	No Project	Applicant's Mitigated Project	Ordinance & Gen Plan Consistency	Reduced Two Cluster	Single Cluster	Single 93% Reduction	Effluent Disposal	Alternative Location	Project w/ Mitigation
WAT Impact 4: Water quality, operation, project-wide	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 5: Effluent discharge, WWTF	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 6: Drought, water supply, cumulative	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 7: Drainage, cumulative	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
WAT Impact 8: Water quality, cumulative	Class II	No Impact	Class II	Class II	Class II	Class II	Class II	Class II	Class II	Class II
SUMMARY OF IMPACTS FOR EACH ALTERNATIVE										
Total Number of Class I Impacts	***20***	***No Impacts***	***15***	***15***	***13***	***11***	***1***	***20***	***7***	***14***
Total Number of Class II Impacts	***76***		***81***	***81***	***82***	***78***	***66***	***76***	***69***	***83***
Total Number of Class III Impacts	***5***		***5***	***5***	***5***	***6***	***18***	***5***	***14***	***4***

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 B Single Cluster Alternative (93% Reduction) is identified as the Environmentally Superior Alternative. Implementation of this alternative would avoid significant adverse impacts to the following resources:

- Biological resources including maintaining stream flow for aquatic species in Los Berros Creek, avoiding sensitive habitats (with the exception of one road crossing), minimizing removal and impacts to coast live oak woodland, and avoiding the potential for accidental discharge into onsite surface waters and habitats;
- No removal of vineyard would occur and adequate buffers would be provided to avoid land use conflicts between residential and agricultural uses;
- All significant archaeological sites and historic resources would be avoided;
- The project would not be affected by noise exceeding thresholds identified in the Noise Element;
- 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.

Due to the dead-end road length, any alternative, aside from the creation of a new frontage road extending to existing interchanges, would result in a significant and unavoidable impact related to lack of adequate emergency access.

The presence of production vineyards throughout a majority of the developable portions of the property substantially limits the potential residential density, if building envelopes and adequate buffer zones are sited outside of active agricultural areas. The EIR identifies the conversion of agricultural Farmland to non-agricultural use as a significant, adverse, and unavoidable impact. Onsite replacement of vineyards, at a minimum 1:1 ratio, while feasible, is not considered to be enforceable in the long-term, because agricultural production is not regulated or enforced by the County Agriculture Department, or other County Agency. Therefore, alternatives are considered that would avoid conversion of agricultural uses to the maximum extent feasible. In addition, consideration of project objectives is required when reviewing project alternatives. As noted in Table VI-4 below, the Environmentally Superior Alternative, which proposes a substantially reduced density compared to the proposed project, is consistent with most identified objectives.

TABLE VI-4
Project Objectives

Objective	General Consistency
Preclude future residential development within designated agricultural/open space easements.	Potentially consistent
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.	Potentially consistent
Provide for the expansion of the existing winery operations and continuation of the vineyard operation.	Potentially inconsistent; however, burden of applicant to demonstrate how residential development contributes to the financial continuation of agricultural operations.
Create places to live and enjoy in a scenic rural setting.	Potentially consistent
Create a financially feasible project.	Potentially inconsistent; however, burden of applicant to demonstrate
Enhance long-term agriculture viability.	Potentially consistent