

6.0 ALTERNATIVES

6.1 CEQA REQUIREMENTS

6.1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the proposed project or to the location of the project that could feasibly avoid or lessen any significant impacts while substantially achieving the basic objectives of the proposed project. An EIR should also evaluate the comparative merits of the alternatives. This section sets forth potential alternatives to the proposed Kortum Ranch Development project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.
- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- The No Project alternative shall be evaluated along with its impacts. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.
- The range of feasible alternatives should be selected and discussed in a manner intended to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of

infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an alternative site.

6.1.2 PROJECT OBJECTIVES

CEQA requires an analysis of alternatives that would feasibly attain most of the basic objectives of the project. As detailed in Chapter 3.0, Project Description of this Draft EIR, project objectives include the following:

- Contribute market-rate housing units to the City's Regional Housing Needs Allocation (RHNA);
- Provide high-quality residential development consistent with the City's long-term development goals;
- Develop the project site in a manner that preserves the uniqueness of the site including the protection of slopes over 30 percent and retention of canopy cover; and
- Permanently preserve sensitive geological areas of the site as protected open space.

6.2 IMPACTS OF THE PROPOSED PROJECT

To develop project alternatives, the City of Calistoga, as Lead Agency, considered the project objectives and reviewed the significant impacts of the proposed project, identified those impacts that could be substantially avoided or reduced through an alternative, and determined the appropriate range of alternatives to be analyzed. Chapter 4.0, Environmental Evaluation, of this Draft EIR evaluates the potential for the proposed project to result in significant impacts to the Biological Resources (Chapter 4.1) Transportation (Chapter 4.2), Wildfire and Wildland Fire Hazards (Chapter 4.3), as well as impacts resulting from a conflict with land use policies and regulations, as it relates to these topic areas.

Consistent with Section 15128 of the CEQA Guidelines, Chapter 4.0 Section 4.0 discusses the reasons that all other environmental topics, including aesthetics, agricultural resources, air quality, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, and recreation, are found not to be significant. All significant and potentially significant impacts of the proposed project will be less than significant with incorporation of mitigation measures and through compliance with federal, state, and local regulations. A summary discussion of significant project impacts analyzed in the Draft EIR is presented below.

6.2.1 BIOLOGICAL RESOURCES

The analysis in Chapter 4.1, Biological Resources identifies potentially significant impacts of the proposed project on special-status species (**Impact BIO-A**) sensitive natural communities (**Impact BIO-B**), state or federally protected wetlands (**Impact BIO-C**), as well as potential conflicts with local policies or ordinances protecting biological resources (**Impact BIO-E**). With implementation of mitigation measures BIO-1 through BIO-8, the analysis concludes that impacts will be less than significant. The analysis concludes that impacts of the project to wildlife movement and habitat connectivity (**Impact BIO-D**) will be less than significant, and there will be no impacts as a result of conflicting with an adopted habitat conservation plan (**Impact BIO-F**). An analysis of impacts due to a conflict with land use policies and regulations adopted for the purpose of avoiding or mitigating environmental effects as it relates to Biological Resources (**Impact LUP-B**) are discussed in Chapter 4.1 of the DEIR. The analysis concludes that the project will result in less than significant land use impacts as it is consistent with adopted polices and regulations related to the protection of Biological Resources. The project will not result in significant and unavoidable impacts to biological resources.

6.2.2 TRANSPORTATION

The analysis in Chapter 4.2, Transportation identifies potentially significant impacts of the proposed project as a result of hazards due to a geometric design feature (**Impact TRA-C**). With implementation of Mitigation Measure TRA-1, the analysis concludes that impacts resulting from a hazardous design feature will be less than significant. Impacts of the project due to a conflict with a program, plan, ordinance, or policy addressing the circulation system (**Impact TRA-A**), conflict with CEQA Guidelines section 15064.3(b) (**Impact TRA-B**) and as a result of inadequate emergency access (**Impact TRA-D**) will be less than significant. An analysis of impacts due to a conflict with land use policies and regulations adopted for the purpose of avoiding or mitigating environmental effects as it relates to Transportation and Traffic (**Impact LUP-B**) are discussed in Chapter 4.2 of the DEIR. The analysis concludes that the project will result in less than significant land use impacts as it is consistent with adopted polices and regulations related to the City's circulation system. The project will not result in significant and unavoidable impacts to transportation and traffic.

6.2.3 WILDFIRE AND WILDLAND FIRE HAZARDS

The analysis in Chapter 4.3, Wildfire and Wildland Fire Hazards, identifies that the proposed

project will have a less than significant impact on impairing an adopted emergency response plan or emergency evacuation plan (**Impact FIR-A**), but could have potentially significant impacts by exposing project occupants to pollutant concentrations from a wildfire (**Impact FIR-B**), through the installation or maintenance of associated infrastructure that may exacerbate fire risk (**Impact FIR-C**), and on exposing people or structures to downstream flooding or landslides as a result of post-fire slope instability (**Impact FIR-D, Impact HAZ-G** in Initial Study). **Mitigation Measure FIR-1** requires final approval and implementation of the Wildland Fire Protection Plan (WFPP), prepared by Wildland Res Mgt, which will reduce wildfire impacts to less than significant levels. An analysis of impacts due to a conflict with land use policies and regulations adopted for the purpose of avoiding or mitigating environmental effects as it relates to wildfire (**Impact LUP-B**) are discussed in Chapter 4.3 of the DEIR. The analysis concludes that the project will result in less than significant land use impacts as it is consistent with adopted policies and regulations related to wildfire management. The project will not result in significant and unavoidable impacts as it relates to wildfire.

6.2.4 OTHER RESOURCE TOPICS

As discussed above, aesthetics, agricultural resources, air quality, cultural and tribal cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, and recreation were analyzed in the Initial Study (Appendix 2-B) prepared for the project, and with implementation of mitigation measures and compliance with standard regulations, effects were found not to be significant. Following publication of the Initial Study, revisions to the project were made to exclude natural gas in single-family residences, and impacts to Greenhouse Gas Emissions were found not to be significant as discussed in Section 4.3.1 and this DEIR.

6.3 ALTERNATIVES CONSIDERED BUT NOT FURTHER STUDIED

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore merit in-depth evaluation, and which alternatives are infeasible. The following alternatives were considered and found to be infeasible for the reasons discussed below.

6.3.1 REDUCED DENSITY DEVELOPMENT

A reduced density alternative was considered as a means to reduce wildfire impacts as the site is located in a Very High Fire Hazard Severity Zone (VHFSZ). However, as detailed in

Chapter 4.3 of this DEIR the Evacuation Analysis Report prepared by Fehr & Peers (Appendix 4.3-B) found that impacts of development of the subject project, along with two other residential projects will not significantly impact evacuation times, with an addition of less than 15-minutes to the overall evacuation time. The results of the study indicate that any combination of the three proposed projects in all analyzed scenarios will not significantly impact evacuation times. Additionally, the analysis demonstrates that the project will not exacerbate wildfire risk as a result of introducing new residential uses to the site. Because wildfire-related impacts are fully mitigatable, and due to the limited supply and high demand for housing throughout the State of California, a reduced density alternative was removed from the alternatives to be evaluated.

6.3.2 ALTERNATIVE SITE LOCATION

There are no specific site conditions that would preclude the use of the site selected for development and all environmental impacts can be mitigated to less than significant levels on the chosen site. The applicant does not have development control of another site that can be used to accommodate the project and as such, an alternative site location was removed from the alternatives evaluated.

6.4 ALTERNATIVES EVALUATED

Alternatives considered in this Draft EIR are those that meet most of the project's objectives while eliminating or reducing significant and unavoidable impacts as identified in Section 4.0, Environmental Evaluation. Alternatives considered in this Draft EIR include:

- Alternative 1: No Project/No Development
- Alternative 2: Reduced Building Envelopes

Pursuant to CEQA Guidelines Section 15126.6(d), any additional significant effects of the alternatives are discussed in less detail than the significant effects of the proposed project. The following sections describe each alternative, analyze impacts of each alternative as compared to the proposed project, identify significant impacts of the proposed project that would be avoided or lessened by each alternative, assess each alternative's ability to meet the project objectives, and evaluate the comparative merits of the alternative and the proposed project.

6.4.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

Description

The No Project Alternative (NPA) includes continuation of existing conditions on the project site, which is a formerly developed and currently vacant site. All buildings have been removed, however some site infrastructure including an access road from Kortum Canyon Road and a well system remain. Under the NPA, no physical alterations would be made, and the site would continue to be vacant. Reasonably foreseeable activities include uses that are consistent with the corresponding Rural Residential – Hillside (RR-H) zoning designation of the site, such as small-scale agricultural uses, one single family dwelling per lot, transient lodging uses, childcare facilities, religious institutions, public facilities, geothermal activities, supportive and transitional housing, and contractor storage yards. However, for the purposes of this analysis, the NPA assumes no development of the site in the immediate future.

Analysis

Aesthetics

There would be no change in the existing aesthetics baseline conditions from the NPA. This would result in reduced impacts from the Project from less than significant to no impact.

Air Quality

There would be no change in the air quality baseline conditions from the NPA. This would reduce all impacts from the Project to no impact.

Biological Resources

There would be no change in the biological resources baseline conditions on the project site from the NPA. This would reduce all impacts from the Project to no impact.

Cultural and Tribal Cultural Resources

There would be no change in the Cultural and Tribal Cultural baseline conditions on the project site from the NPA. This would result in reduced impacts from the Project from less than significant to no impact.

Geology and Soils

There would be no change in the Geology and Soils baseline conditions on the project site from the NPA. As detailed in the Initial Study, a Debris Flow Hazard Assessment prepared by Bajada Geosciences states that landslide areas onsite have the potential to result in debris flow which could cause downslope hazards. Without the proposed project, downslope hazards would not be addressed as installation of catchment basins or debris fencing in landslide areas would not occur. As such, Impact GEO-AIV would be greater

under the No Project Alternative as compared to the proposed project. As no development would occur under this Alternative, all other impacts would be reduced from less than significant to no impact.

Greenhouse Gas Emissions

There would be no change in the Greenhouse Gas Emissions baseline conditions from the NPA. This would result in reduced impacts from less than significant to no impact.

Hazards and Hazardous Materials

There would be no change in the Hazards and Hazardous Materials baseline conditions from the NPA. This would reduce all impacts from the Project to no impact.

Hydrology and Water Quality

There would be no change in the Hydrology and Water Quality baseline conditions from the NPA. This would reduce all impacts from the Project to no impact.

Land Use and Planning

The NPA would not meet the objective of the Project to provide market rate housing that contribute to the City's Regional Housing Needs Allocation (RHNA) which is a goal of the Housing Element and the General Plan. Further, the site is designated in the General Plan and zoned Rural Residential-Hillside. Uses permitted by-right in the RR-H zoning district, are limited to (1) small-scale agriculture, horticulture, and gardens, commercial vineyards and orchards not larger than two acres in area; (2) one accessory dwelling unit per lot; and (3) one junior accessory dwelling unit per lot. None of the uses permitted by-right could be established on the site in its current state as the site does not meet the two-acre limit for establishing a small-scale agricultural operation, and does not contain any primary dwellings that would provide for establishment of an accessory or junior accessory dwelling unit. While one-family dwelling uses require approval of a Use Permit, under the NPA, no uses would be established on the site, which while not directly inconsistent with the General Plan, does not meet the intended land use of the site nor would it further the goals of the City's Housing Element. Therefore, the NPA would result in potentially significant impacts to Impact LUP-B (as described in the Initial Study) because the NPA would conflict with the City's General Plan, Housing Element, and Zoning Ordinance.

Noise

There would be no change in the Noise baseline conditions from the NPA. This would reduce all impacts from the Project to no impact.

Population and Housing

There would be no change in the Population and Housing baseline conditions from the NPA. This would reduce the impacts from the Project from less than significant to no impact.

Public Services

There would be no change in the Public Services baseline conditions from the NPA. This would reduce the impacts from the Project from less than significant to no impact.

Recreation

There would be no change in the Recreation baseline conditions from the NPA. This would reduce the impacts from the Project from less than significant to no impact.

Transportation and Traffic

There would be no change in the Transportation and Traffic baseline conditions from the NPA. This would reduce the impacts from the Project to no impact.

Utilities and Service Systems

There would be no change in the Utilities and Service Systems baseline conditions from the NPA. This would reduce the impacts from the Project from less than significant to no impact.

Wildfire

There would be no change in the Wildfire baseline conditions from the NPA. The site is designated by CalFire as a Very High Fire Hazard Severity Zone. The undeveloped site includes trees and brush that could serve as fuel, thereby increasing fire risk on the site and posing a wildfire hazard to existing development that surrounds the property. The City of Calistoga Municipal Code Chapter 1.12 provides the City's authority to require the abatement of nuisances within the City limits. This includes overgrown brush that poses a fire risk, and the City could require the property owner to conduct site maintenance if the site were to remain undeveloped. Further, there would be no change in evacuation routes and times from the NPA. Therefore, through the application of uniformly applied regulations in the City of Calistoga Municipal Code, the NPA would have less than significant impacts on Wildfire.

Other Resource Topics

The NPA will not result in any cumulative or significant and unavoidable impacts.

Conclusion

Avoid or Substantially Lessen Project Impacts

The NPA would result in no change to the baseline conditions and would have less than significant or no impact to aesthetics, agriculture, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

The NPA would potentially conflict with the General Plan and Zoning Ordinance that designates the site as Rural Residential-Hillside because it would conflict with several goals in the City's Housing Element 2023-2031 including Objective H-1.2 to make effective use of residential development sites and would not contribute to the Regional Housing Needs Allocation (RHNA) as quantified in Table 8-2 of the Housing Element. Therefore, the NPA could have a potentially significant impact as a result of a conflict with adopted plans, policies, and regulations.

Attain Project Objectives

The NPA would not meet the following objectives because it would result in no housing development on the site:

- Contribute market-rate housing units to the City's RHNA would not be achieved through the NPA because it would result in no housing development.
- Provide high-quality residential development consistent with the City's long-term development goals would not be met by the NPA.

The objective to develop the project site in a manner that preserves its uniqueness through the protection of slopes over 30 percent and retention of canopy cover would partially be met by the NPA as no development would preserve the site in its current state. However, the NPA would not result in a residential development that is integrated with the natural features of the site and as such this aspect of the objective is not achieved through this alternative.

The objective to permanently preserve sensitive geological areas of the site as protected open space would not be achieved by the NPA because the site could be subject to future ministerial development as mandated by state housing laws, such as Senate Bill (SB) 9. Ministerial development projects are not subject to CEQA and provide no opportunities for

discretion. Therefore, the site has the potential to be developed in the future in a way that would preclude the City from imposing conditions of approval to preserve sensitive geological areas and permanent preservation of sensitive geologic areas would not be achieved. Therefore, this alternative does not meet the stated objective to permanently preserve sensitive geological areas on the site.

6.4.2 ALTERNATIVE 2: REDUCED BUILDING ENVELOPE

Description

Under this Alternative, building envelopes within which single-family residences could be developed would be reduced and the area of the site that would be permanently protected to preserve sensitive geological and biological areas (e.g. sloped and wooded areas) would be increased. Each site would still maintain a sufficient building envelope to accommodate a single-family residence and an accessory dwelling unit, and/or junior accessory dwelling unit, which are not currently proposed by the project, but are considered by-right uses under state law. Under the Reduced Building Envelope Alternative, the four parcels that make up the Project site would still be subdivided into 20 individual lots to accommodate the future construction of single-family residences. However, the building envelope on Lots 1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19 and 20 would be reduced as shown in Figure 6-1 below. The redline represents the proposed building envelope and the green outline represents the reduced building envelope.

FIGURE 6-1: REDUCED BUILDING ENVELOPES ALTERNATIVE

The reduced building envelopes would avoid approximately 647 square feet of wetlands (W2 and W5), 2,528 square feet of other waters, and approximately 1,000 square feet of other linear waters, as well as minimize improvements on slopes over 29.5%. The reduction in the building envelopes would not substantially reduce the size of the residences because the size of the lots that have a reduced building envelope have ample space to accommodate single-family residences and associated residential amenities. As such, the size of future single-family residences in this scenario would still range from approximately 2,500 to 4,500 square feet.

Analysis

Aesthetics

The reduced building envelope alternative would still result in the development of 20 new single-family residences and would also be subject to the City's Hillside Development Ordinance, Calistoga Municipal Code Chapter 17.15, and the City's Residential Design Guidelines. The reduced building envelope would not reduce the number of trees initially planned for removal as part of the roadway improvements, and future development of single-family residences under this Alternative would also be developed on portions of the

lot that have been previously developed, resulting in minimal or no removal of trees. As with the proposed project, the Reduced Building Envelope Alternative would result in less than significant aesthetic impacts as it relates to impacts to a scenic vista (Impact AES-A), scenic resources within a State designated scenic highway (Impact AES-B), and through degradation of the existing visual quality of public views of the site (Impact AES-C). This Alternative would also be subject to Mitigation Measure AES-1 to reduce potential impacts associated with a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Impact AES-D), and with implementation impacts under this Alternative would also be less than significant.

Air Quality

Reducing the building envelope would not reduce the number of units allowable on the site, nor would it substantially reduce the equipment or time needed for construction of the project. Therefore, the impacts from a reduced building envelope would be potentially significant and Mitigation Measures AQ-1 and AQ-2 would still be required to reduce air quality impacts to less than significant. With mitigation, the reduced building envelope alternative would also result in less than significant impacts.

Biological Resources

The Reduced Building Envelope Alternative would avoid special-status plants as the buildable area would preclude development on areas of the site where these plant species were observed and documented. This Alternative would achieve avoidance of individual populations of the special-status species, narrow-anthered brodiaea, as set forth in Mitigation Measure BIO-1, however, because additional individual populations of narrow-anthered brodiaea have the potential to occur onsite, compliance with Mitigation Measure BIO-1, including surveys, relocation, and mitigation credits would still be required. Through avoidance of individual species observed onsite and with implementation of measure BIO-1, impacts to the special-status plant species, narrow-anthered brodiaea would continue to be less than significant (Impact BIO-A). The Reduced Building Envelope Alternative would still involve removal of trees and as such has the potential to result in impacts to special-status animal species, including birds protected under the Migratory Bird Treaty Act (MBTA) and special-status bats (Impact BIO-A). This Alternative would also be required to conduct surveys in compliance with Mitigation Measure BIO-2 (requiring bat surveys) and BIO-3 (requiring nesting bird surveys). With implementation of these measures, impacts to special-status animal species would be less than significant.

Under this Alternative, impacts to sensitive natural communities (Impact BIO-B) would be

slightly less than the proposed project as building envelopes and future single-family residences would be sited further away from wooded areas. As with the proposed project, this Alternative would also be required to comply with Mitigation Measure BIO-4 related to tree removal and protection as well as Mitigation Measure HYD-2, which requires implementation of a stormwater pollution prevention plan. As such, impacts to sensitive natural communities under this Alternative would also be less than significant.

As noted above, the Reduced Building Alternative would avoid approximately 647 square feet of wetlands (W2 and W5), 2,528 square feet of other waters (OW3) and approximately 440 linear feet of other waters (OW1, OW2, OW3, OW4, OW5, OW6, and OW7) which are located on Lots 12 and 13, 19, and 20 . Under this Alternative, potential direct and indirect impacts to wetlands W1, W3 and W4 would still occur (Impact BIO-C). As such, this Alternative would be subject to Mitigation Measure BIO-5 requiring incorporation of avoidance measures and best management practices, Mitigation Measure BIO-6 requiring a 20-foot non-disturbance buffer around wetlands and other waters to be avoided, and Mitigation Measures BIO-7 and BIO-8, requiring the applicant to obtain applicable regulatory permits. With implementation of these mitigation measures, impacts to state protected wetlands would be less than significant.

As with the proposed project, the Reduced Building Envelope Alternative would not interfere with the movement of fish or other wildlife species (Impact BIO-D) and impacts under this Alternative would be less than significant.

As stated above, under this Alternative, protected trees would still be removed to accommodate improvements associated with widening and paving the east-west project roadway which could result in impacts due to a conflict with local regulations (Impact BIO-E). Additionally, construction of single-family residences has the potential to impact protected trees which could also result in impacts due to a conflict with local regulations. As with the proposed project, this Alternative would be required to comply with Chapter 19.01 (Trees) of the Calistoga Municipal Code, which is incorporated through Mitigation Measure BIO-4. As with the proposed project, implementation of measure BIO-4 would ensure this alternative complies with local regulations and therefore impacts resulting from a conflict with such regulations would be less than significant.

Cultural and Tribal Cultural Resources

As with the proposed project, this Alternative would not result in impacts to historical resources (Impact CUL-A) as none are present onsite. The Reduced Building Envelope

alternative may result in less disturbance compared to the proposed Project, however, because ground disturbance would still occur, the potential to impact archaeological resource (Impact CUL-B) remains. This Alternative would also be required to comply with Mitigation Measure CUL-1 to address accidental discovery during ground disturbing activities. Therefore, the reduced building envelope would also have less than significant impacts to archaeological resources. Similar to the proposed project, compliance with California Health and Safety Code Section 7050.5 would ensure impacts resulting from the accidental discovery of human remains (Impact CUL-C) would be less than significant.

Geology and Soils

As with the proposed project, the Reduced Building Envelope Alternative would result in less than significant impacts associated with direct or indirect substantial adverse effects involving rupture of a known earthquake fault (Impact GEO-AI), strong seismic ground shaking (Impact GEO-AII), and seismic-induced liquefaction (Impact GEO-III). As with the proposed project, the Reduced Building Envelope Alternative would not include septic or alternative waste disposal and as such there would be no impacts associated with soils incapable of supporting such systems.

Under this Alternative, development on slopes that have historically, or prehistorically experienced landslides or debris flows would be reduced as compared to the proposed project as the reduction in buildable area avoids steeper slopes. While the reduction in building envelopes would preclude development on slopes greater than 29.5%, because the site is on a hillside potentially significant impacts as it relates to downslope hazards (Impact GEO-AIV) still exist. As with the proposed project, Mitigation Measures GEO-1 requiring installation of catchment basins or debris fencing in areas identified as potential hazards would still be required, and with implementation, impacts related to downslope hazards would be less than significant.

Because site conditions are the same under the proposed project and this alternative, impacts related to erosion (Impact GEO-B), lateral spreading (Impact GEO-C), expansive soils (Impact GEO-D), and disturbance of paleontological resources (Impact GEO-F) would be the same under the Reduced Building Envelope Alternative as the proposed project and would require implementation of Mitigation Measures GEO-2 (requiring incorporation of geotechnical recommendations), GEO-3 (requiring compliance with the City's Stormwater Runoff Pollution Control Ordinance), and GEO-4 (requiring measures to follow if paleontological resources are encountered during construction). With implementation of these measures, all impacts related to geology and soils under this Alternative will be less

than significant. Reducing the building envelope would preserve slope areas that are otherwise not preserved by the proposed project. However, this Alternative would not substantially reduce impacts as compared to the proposed project.

Greenhouse Gas Emissions

The reduction of building envelopes under this Alternative would not reduce the size of residences allowable on each lot. The Project would still incorporate design elements including replacing natural gas with electric power, eliminating inefficient or wasteful energy usage, reducing project-generated VMT to the recommended 15-percent reduction below existing, and providing electric vehicle (EV) charging infrastructure to support the shift to EVs. Therefore, greenhouse gas emissions from construction and operation under the Reduced Building Envelope Alternative would be less than significant, as with the proposed project.

Hazards and Hazardous Materials

Reducing the building envelope will not change the existing conditions of the site, which is not on a list of hazardous materials sites nor within two miles of an airport and there would be no impact and no change in impacts from this Alternative as compared with the proposed project. Additionally, the Reduced Building Envelope Alternative would neither increase nor reduce the impacts from creating a significant hazard to the public through the routine transport of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, nor impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant. As further discussed below, reducing building envelopes could provide more defensible space between heavily wooded areas and single-family residences, however, impacts related to wildland fire hazards under this Alternative would continue to be potentially significant and a fuel management program as required by Mitigation Measure FIR-1 would still be required. With implementation of measure FIR-1, impacts related to wildfire hazards would be less than significant, as with the proposed project.

Hydrology and Water Quality

The Reduced Building Envelope Alternative would reduce the area of the site that would be disturbed by development, limit development to flatter areas, and preserve steeper hillsides in perpetuity. Reducing the disturbed area would help reduce erosion and runoff (Impact HYD-A) and decrease impacts to the existing drainage pattern onsite (Impact HYD-

C). Under this Alternative, implementation of Mitigation Measures HYD-1 and HYD-2 would still be required to ensure that the project would not result in runoff that could degrade water quality. The reduced building envelope would not result in impacts to groundwater (Impact HYD-B) nor would it conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Impact HYD-E) and impacts of this Alternative would be less than significant, as with the proposed project. As with the proposed project, there would be no impacts related to a release of pollutants due to project inundation (Impact HYD-D). While the reduced building envelope alternative could reduce erosion through the avoidance of steeper slopes and improve infiltration by limiting areas that can be developed, the alternative would still require the same mitigations as the proposed project and impacts of this Alternative would be the same as the proposed project.

Land Use and Planning

The reduced building envelope alternative would require the same conditions and mitigation measures in each section of the Initial Study and this EIR to ensure compliance with the goals, policies, and programs of the Calistoga General Plan and the regulations of the Calistoga Municipal Code and Zoning Ordinance. While the reduced building envelope alternative would reduce some of the effects of the project, it would still be less than significant and as such, the reduced building envelope would have no substantial change in the level of impacts.

Minerals

As with the proposed project, the Reduced Building Envelope Alternative includes development of residential uses, which would not include extraction of volcanic ash for commercial use. As such, impacts resulting from the loss of availability of a known mineral resource (Impact MIN-A) and the loss of availability of a locally-important mineral resource recovery site (Impact MIN-B) would also be less than significant.

Noise

The reduced building envelope alternative would still result in potentially significant impacts from temporary noise levels related to construction of the project (Impact NOI-A) and Mitigation Measure NOI-1 which requires the use of construction best management practices would still be required. As with the proposed project, implementation of measure NOI-1 would reduce impacts of the Reduced Building Envelope Alternative to less than significant. The Reduced Building Envelope Alternative would construct the same number

and size of single-family residences. As with the proposed project, the Alternative would generate excessive groundborne vibration or noise levels (Impact NOI-B) and impacts under this Alternative would also be less than significant. There is no change in the location under this Alternative and as such, there would be no impact from noise related to the site's proximity to an airport. As such, the Reduced Building Envelope Alternative would have similar impacts and would not substantially reduce or increase impacts as compared to the proposed project.

Population and Housing

As with the proposed project, the Reduced Building Envelope Alternative would not substantially induce growth directly or indirectly (Impact POP-A) and the increased population associated with this Alternative would be the same as the Project, approximately 62 people, representing approximately one percent of the city's projected growth by 2040. Under this Alternative, installation of utilities would be the same as the proposed project and would be limited to the capacity necessary to accommodate residential development on the site. The Reduced Building Envelope Alternative would still involve widening the Kortum Canyon Road right-of-way, which would result in demolition of an existing residential unit and could therefore result in displacement of existing housing (Impact POP-B). Demolition of this residential unit would be offset through the conversion of an accessory structure into a dwelling unit at 1101 Foothill Blvd. As such this Alternative, as with the proposed project, would have less than significant impacts related to population and housing.

Public Services

The Reduced Building Envelope Alternative would not change demand on public services including police, fire, schools, or recreation services because this Alternative proposes the same number of dwelling units as the proposed project. As such this Alternative would have less than significant impacts to public services and there would be no change compared to the proposed project.

Recreation

The Reduced Building Envelope Alternative would have the same number of residential units and as such would not change the number of residents anticipated as compared to the proposed project. As such, impacts to recreation resources would continue to be less than significant.

Transportation and Traffic

The Reduced Building Envelope Alternative would not change the number of vehicles traveling to and from the site, nor would it change the proposed on- and off-site improvements. As such, this Alternative would also result in less than significant impacts related to a conflict with regulations addressing the circulation system (Impact TRA-A), vehicle miles traveled (Impact TRA-B), and emergency access (Impact TRA-D). As with the proposed project, the Reduced Building Envelope Alternative has the potential to result in hazards associated with site distances at the project site entrance. Under this Alternative, compliance with Mitigation Measure TRA-1 would be required, which would reduce impacts associated with a design feature hazard to less than significant. As such, the Reduced Building Envelope Alternative would result in similar impacts as the proposed project.

Utilities and Service Systems

As noted above, the Reduced Building Envelope Alternative would not reduce the number of dwelling units, nor result in a reduction in the allowable size of dwellings. Therefore, impacts to utilities including water, wastewater, storm water, solid waste, and all other utilities would be similar as the proposed project and impacts of this Alternative would be less than significant.

Wildfire

Under the Reduced Building Envelope Alternative, impacts to an adopted emergency response plan or emergency evacuation plan (Impact FIR-A) would be the same as the proposed project. Occupants of the site under this Alternative would also be provided with evacuation notices through AlertNapa - Everbridge, ZoneHaven, and/or the City's emergency notification sirens and would utilize Foothill Boulevard/Highway 128 and Lincoln Avenue/ Highway 29 to leave the area. There are three sirens in Calistoga, the two closest, one at the Calistoga Community Pool (2,485 feet away) and the City of Calistoga Public Works Center (3,088 feet away) have an expected Lmax of 75-80 dB(C) on the project site. As detailed in the Evacuation Analysis Report prepared by Fehr & Peers, residential development at the site in combination with other residential developments would have less than a 15-minute effect on evacuation time. With evacuation notification and due to the minimal addition in overall evacuation time, the Reduced Building Envelope Alternative would result in less than significant impacts to an emergency response or evacuation plan.

As with the proposed project, the Reduced Building Envelope Alternative could also result in potentially significant wildfire impacts because development on the site, which is designated Very High Fire Hazard Severity, could exacerbate wildfire risks due to slope, prevailing winds, and other factors, which could expose project occupants to pollutant

concentrations from a wildfire (Impact FIR-B and Impact FIR-E). Reducing the developable area on 18 of the 20 proposed lots under this alternative would create more defensible space, providing a greater buffer between developed areas and undeveloped wildland areas. Despite creating more defensible space, due to the location within a VHFHSZ, potential impacts under this Alternative remain. As such, the Reduced Building Envelope Alternative would also be required to comply with Mitigation Measures FIR-1 and FIR-2. With implementation of measures FIR-1 and FIR-2, impacts would be less than significant.

The Reduced Building Envelope Alternative would not require installation or maintenance of infrastructure that would exacerbate fire risk (Impact FIR-C) and impacts would be less than significant.

Under this Alternative, impacts associated with post-fire slope instability or drainage changes (Impact FIR-D) would be the same as the proposed project. Because the site is steeply sloped and exhibits prior landslide activity, implementation of Mitigation Measure GEO-1 would be required under this Alternative to address downslope hazards through installation of catchment basins or debris fencing. Lastly, as specified in the WFPP, required to be implemented by Mitigation Measure FIR-1, the site under this Alternative would also be subject to periodic inspection by the Calistoga Fire Department, who would identify, among other issues, erosion or slope stability concerns. With implementation of mitigation measures, impacts resulting from post-fire instability or drainage changes under the Reduced Building Envelope Alternative would be less than significant.

As detailed above, under this Alternative, wildfire impacts would be similar to impacts of the proposed project.

Conclusion

Avoid or Substantially Lessen Project Impacts

The Reduced Building Envelope Alternative would protect steeper slopes and reduce the developable area on 18 of the 20 proposed lots. This alternative would still result in the development of 20 single-family dwelling units, an access road, and all associated infrastructure and public improvements. While the reduced envelope could have slightly fewer impacts as it relates to biological resources, geology and soils, and wildfire, the same mitigation measures required for the proposed project would also be required to reduce impacts to less than significant and as such, this Alternative would not substantially reduce impacts as compared to the proposed project.

Attain Project Objectives

The Reduced Building Envelope Alternative would not reduce the number of units and would still contribute 20 market-rate housing units to the City's RHNA. Therefore, this objective would be met. Further, reducing building envelopes on 18 of the 20 lots would not require reducing the size or quality of the housing units and the project would still meet the objective to provide high-quality residential development consistent with the City's long-term development goals.

The Reduced Building Envelope Alternative would improve the project's ability to meet the objective to develop the site in a manner that preserves its uniqueness, including protecting slopes over 30 percent and retaining canopy cover as it would limit developable areas where slopes are 30 percent or greater, which would in turn protect trees located in steeply sloped areas. In addition, this Alternative would reduce potential impacts to a limited area of wetlands and other waters by precluding development in these areas.

The objective to permanently preserve sensitive geological areas of the site as protected open space would be better met through the Reduced Building Envelope Alternative because reducing the building envelope would ensure that sensitive geological areas are preserved and those areas would have a larger buffer from development as compared to the proposed project. Therefore, this alternative improves the ability to meet this objective.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the State CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Under the No Project/No Development Alternative, no physical changes would occur on the project site, and no new environmental impacts beyond what currently exists would occur. As such, the No Project/No Development alternative is considered the environmentally superior alternative as it would reduce or eliminate short-term, long-term, and cumulative impacts in all categories when compared to the proposed project.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. As stated above and as shown in Table 6-1, the No Project/No Development alternative would be the environmentally

superior alternative because it would eliminate all potentially significant impacts of the proposed project. However, while the No Project/No Development alternative is the environmentally superior alternative, it is not capable of meeting any of the project objectives.

After the No Project alternative, the environmentally superior alternative is that which would result in the fewest or least significant environmental impacts. Based on the analysis contained herein and as shown in Table 6-1, Alternative 2: Reduced Building Envelope is the environmentally superior because it would better protect biological resources including sensitive plant species and wetland areas, geological resources including areas with 30 percent slopes or greater, and would reduce the overall area of the site impacted. However, the Alternative would still have potentially significant impacts as noted in the analysis above and the same mitigation measures would be required to reduce impacts to less than significant. Though this Alternative would not substantially lessen the impacts of the project, because impacts would be slightly reduced, the Reduced Building Envelope Alternative is the environmentally superior Alternative after the No Project/No Development Alternative.

TABLE 6-1: COMPARISON OF PROJECT ALTERNATIVES

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
AES-A	Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.	LTS	NI -	LTS =
AES-B	Implementation of the proposed project would not substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway.	LTS	NI -	LTS =
AES-C	Development of the project site would not substantially degrade the visual character and quality of public views of the site and its surroundings.	LTS	NI -	LTS =
AES-D	The project would not create a new source of substantial light or glare which would adversely affect day or nighttime	PS/LTS	NI -	PS/LTS =
AG-A	The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	LTS	NI -	LTS =
AG-B	The Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	NI	NI =	NI =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
AG-C	The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	LTS	NI -	LTS =
AG-D	The project would not result in the loss of forest land or conversion of forest land to non-forest use.	LTS	NI -	LTS =
AG-E	The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	LTS	NI -	LTS =
AQ-A	Implementation of the Project would not conflict with or obstruct implementation of an applicable air quality plan.	PS/LTS	NI -	PS/LTS =
AQ-B	Construction and operation of the Project would not generate emissions that would result in a cumulatively considerable net increase of any critical pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	PS/LTS	NI -	PS/LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
AQ-C	Implementation of the Project would not potentially expose sensitive receptors to substantial pollutant concentrations.	PS/LTS	NI -	PS/LTS =
AQ-D	Implementation of the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	PS/LTS	NI -	PS/LTS =
BIO-A	The Project could result in a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	PS/LTS	NI -	PS/LTS =
BIO-B	The project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	PS/LTS	NI -	PS/LTS -
BIO-C	The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	PS/LTS	NI -	PS/LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
BIO-D	The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	LTS	NI -	LTS =
BIO-E	The Project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	PS/LTS	NI -	PS/LTS =
BIO-F	The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	NI	NI =	NI =
CUL-A	Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	LTS	NI -	LTS =
CUL-B	Implementation of the project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	PS/LTS	NI -	PS/LTS =
CUL-C	Implementation of the project could potentially cause a significant impact due to disturbance of human remains, including those interred outside of formal cemeteries.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
GEO-A.i	The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map	LTS	NI -	LTS =
GEO-A.ii	The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking	LTS	NI -	LTS =
GEO-A.iii	The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	LTS	NI -	LTS =
GEO-A.iv	The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving landslides	PS/LTS	NI -	PS/LTS -
GEO-B	The proposed project could result in substantial soil erosion or loss of topsoil.	PS/LTS	NI -	PS/LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
GEO-C	The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	PS/LTS	NI -	PS/LTS =
GEO-D	The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	PS/LTS	NI -	PS/LTS =
GEO-E	The proposed project will not be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water.	NI	NI =	NI =
GEO-F	The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	PS/LTS	NI -	PS/LTS =
GHG-A	Implementation of the proposed KProject would not generate greenhouse gas emissions, either directly or indirectly, that would result in a significant impact on the environment.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
GHG-B	Implementation of the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS	NI -	LTS =
HAZ-A	The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	NI -	LTS =
HAZ-B	The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LTS	NI -	LTS =
HAZ-C	The proposed project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS	NI -	LTS =
HAZ-D	The proposed project would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	NI	NI =	NI =
HAZ-E	The proposed project would be located within an airport land use plan, but would not result in a safety hazard or excessive noise for people residing or working in the project area.	NI	NI =	NI =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: No PROJECT/No DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
HAZ-F	The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	NI -	LTS =
HAZ-G	The proposed project could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	PS/LTS	NI -	PS/LTS =
HYD-A	Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	PS/LTS	NI -	PS/LTS =
HYD-B	Implementation of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
HYD-C	Implementation of the proposed would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows.	PS/LTS	NI -	PS/LTS =
HYD-D	Implementation of the proposed project would not result in the risk of release of pollutants due to project inundation as a result of being located in a flood hazard, tsunami, or seiche zone.	NI	NI =	NI =
HYD-E	Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS	NI -	LTS =
LUP-A	The project would not physically divide an established community.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
LUP-B	The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.			
BIO-G		PS/LTS	NI -	PS/LTS =
TRA-E		LTS	NI -	LTS =
FIR-F		PS/LTS	NI -	PS/LTS =
MIN-A	The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	LTS	NI -	LTS =
MIN-B	The project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan	LTS	NI -	LTS =
NOI-A	The proposed project could involve generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	PS/LTS	NI -	PS/LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: No PROJECT/No DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
NOI-B	The proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels.	LTS	NI -	LTS =
NOI-C	The proposed project, would not expose people residing or working in the project area to excessive noise levels as a result of being located in an airport land use plan.	NI	NI =	NI =
POP-A	The project would not induce direct substantial population growth in the area as a result of construction of the proposed units, nor would the project result in indirect population growth in the area as a result of expansion of public facilities, such as roads or other infrastructure.	LTS	NI -	LTS =
POP-B	The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	LTS	NI -	LTS =
PUB-A-E	The project would not require expansion or construction of new governmental facilities which could result in substantial adverse physical impacts as a result of increased demand for fire protection, police protection, schools, parks, or other public facilities.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
REC-A	The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	LTS	NI -	LTS =
REC-B	The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	LTS	NI -	LTS =
TRA-A	The project will not conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities.	LTS	NI -	LTS =
TRA-B	The project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (B).	PS/LTS	NI -	PS/LTS =
TRA-C	The project will not substantially increase hazards due to a geometric design or incompatible uses.	PS/LTS	NI -	PS/LTS =
TRA-D	Implementation of the project will not result in inadequate emergency access.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
TCUL-A,B	The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	PS/LTS	NI -	PS/LTS =
UTI-A	Implementation of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LTS	NI -	LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
UTI-B	Implementation of project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	LTS	NI -	LTS =
UTI-C	Implementation of the project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	NI -	LTS =
UTI-D	Implementation of the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	NI -	LTS =
UTI-E	Implementation of the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LTS	NI -	LTS =
FIR-A	The project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	PS/LTS	NI -	PS/LTS =

PROJECT IMPACT		KORTUM RANCH DEVELOPMENT: PROPOSED PROJECT BEFORE AND AFTER MITIGATION	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: REDUCED BUILDING ENVELOPE ALTERNATIVE
FIR-B	The project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	PS/LTS	NI -	PS/LTS =
FIR-C	The project would not require installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	PS/LTS	NI -	PS/LTS =
FIR-D	The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	PS/LTS	NI -	PS/LTS =

Key:

S	Significant
SU	Significant and unavoidable
PS	Potentially significant
LTS	Less than significant
NI	No impact
=	Impact similar to proposed project
-	Impact less than proposed project
+	Impact greater than proposed project