

16 ALTERNATIVES

INTRODUCTION

This chapter describes reasonable alternative versions of the proposed project that could lessen impacts or that provide meaningful information to foster informed decisions. An evaluation comparing impacts of the alternatives to the impacts of the proposed project is included. The following impact discussions are presented in either a qualitative or a quantitative manner depending on resource topic, and are generally briefer than those found in the project chapters, consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15126.6(d). This chapter does not repeat background discussions or other subject matter, which has already been described in the topical chapters of this EIR, but focuses on those alternative impacts which are substantively different than the impacts described for the proposed project. Reviewers are encouraged to read the topical chapters describing project impacts prior to reading the Alternatives chapter for additional background and context that precede this chapter (i.e., Chapters 3 through 15).

REGULATORY CONTEXT

CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS

As stated in Section 15126.6 of the CEQA Guidelines:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The CEQA Guidelines provide that the discussion of alternatives in an EIR should focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project” (CEQA Guidelines Section 15126.6[b]). The CEQA Guidelines also provide that “alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (CEQA Guidelines Section 15126.6[f]; Public Resources Code (PRC) Sections 21002, 21002.1[b], 21081[a] [discussing mitigation of “significant” impacts]; *North Coast Rivers Alliance v. Marin Municipal Water Dist.* [2013] 216 Cal. App. 4th 614, 649; *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 928 [reduced size alternative not required because it would not lessen significant effects]). The CEQA Guidelines further require consideration of a “No Project” alternative (Section 15126.6[d][e]).

The range of potentially feasible alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The potential feasibility of an alternative may be determined based on a variety of factors, including economic viability, availability of infrastructure, and other plans or regulatory limitations. As stated in PRC Section 21081[a][3], the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body.

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in CEQA Guidelines Section 15126.6(a).

CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

ATTAINMENT OF PROJECT OBJECTIVES

Pursuant to Section 15126.6 of the CEQA Guidelines, an alternative must “attain most of the basic objectives of the project.” The basic objectives of the project are to deliver utility-scale solar energy to Sacramento County and the SMUD region (i) support timely and cost-effective attainment of SMUD's 2030 Zero Net Carbon targets and 2030 renewable energy portfolio standards (ii) support attainment of the state's 2030 renewable portfolio standards for the SMUD region, and (iii) optimize use of existing electrical distribution infrastructure. The project objectives include the following:

- Provide a local supply of solar energy for the Sacramento County region to implement the County of Sacramento General Plan applicable to renewable energy.
- Provide cost-effective delivery of local utility-scale solar energy to support attainment of SMUD's 2030 Zero Net Carbon Plan targets, and Integrated Resource Plan targets.
- Support SMUD region in attainment of state 2030 Renewable Portfolio Standards.
- Comply with SMUD's Integrated Resource Plan siting and size criteria for local utility-scale solar facilities.
- Optimize use of existing electrical distribution and other infrastructure with existing capacity to minimize environmental impacts of new construction.
- Provide local employment and training opportunities for a variety of building trades.

ENVIRONMENTAL IMPACTS OF THE PROJECT

Chapters 3 through 15 of this EIR address the environmental impacts of implementing the proposed project. Potentially feasible alternatives were developed with consideration of avoiding or lessening environmental impacts of the project, as identified in this document.

The significant and unavoidable impacts of the project are:

- Chapter 3, Aesthetics:
 - Have a substantial adverse effect on a scenic vista.
 - Substantially Damage Scenic Resources Within a State- or County-Designated Scenic Highway
 - Substantially degrade the existing visual character or quality of the project site and conflicts with applicable zoning and other regulations governing scenic quality.

- Chapter 14, Tribal Cultural Resources:
 - Cause a substantial adverse change in the significance of a Tribal Cultural Resource.

The potentially significant impacts of the project that can be reduced to less than significant with mitigation include:

- Chapter 3, Aesthetics:
 - Create substantial new sources of light and glare.
- Chapter 4, Agricultural Resources
 - Conversion of agricultural land to non-agricultural use.
- Chapter 5, Air Quality
 - Conflict with or obstruct implementation of the applicable air quality plan.
 - Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
 - Expose sensitive receptors to substantial pollutant concentrations.
- Chapter 6, Biological Resources
 - Have a Substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.
 - Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.
 - Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means.
 - 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.
 - Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
 - Conflict with the provisions of an adopted HCP, natural community conservation plan, or other approved local, regional, or state HCP.

- Chapter 7, Climate Change
 - Generate Greenhouse Gas Emissions, either directly or indirectly, that may have a significant impact on the environment.
- Chapter 8, Cultural and Paleontological Resources
 - Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
 - Disturb Any Human Remains, Including Those Interred Outside of Dedicated Cemeteries.
 - Damage to or destruction of unique paleontological resources during earthmoving activities.
- Chapter 9, Hazards and Hazardous Materials
 - Routine Transport, Use, or Disposal of Hazardous Materials or Reasonably Foreseeable Upset and/or Accident Conditions Involving the Release of Hazardous Materials.
 - Hazards from development on a site listed in California Government Code Section 65962.5 (Cortese List).
- Chapter 10, Hydrology and Water Quality
 - Impede Sustainable Groundwater Management of the Basin by Substantially Decreasing Groundwater Supplies or Interfering with Groundwater Recharge.
 - Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan.
- Chapter 12, Noise
 - Temporary, Short-Term Exposure of Sensitive Receptors to Construction Noise.
 - Temporary, Short-Term Exposure of Sensitive Receptors to Potential Groundborne Noise and Vibration from Project Construction.
 - Permanent Exposure of Off-Site Noise-Sensitive Receptors to Generation of Non-Transportation Noise Levels in Excess of Local Standards.
- Chapter 13, Traffic and Circulation
 - Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment).
- Chapter 15, Wildfire

- Exacerbate wildfire risk.

RANGE OF ALTERNATIVES

To foster meaningful public discussion and informed decision-making, a range of reasonable alternatives to the proposed project were developed, as summarized below. Some of the alternatives considered were infeasible and rejected without detailed analysis, for the reasons explained below.

The reasonable range of alternatives for this project is determined to consist of the No Project alternative, the Biological Resources Alternative (Alternative 1), and the Scott Road Buffer Alternative (Alternative 2). CEQA does not require a particular number of alternatives, only that a reasonable range be considered. The purpose of the “No Project” alternative is to allow the hearing body to compare the impacts of approving the project to the impacts of not approving the project. The “No Project” alternative describes what would happen if the existing land use designations remained in effect. As outlined in Section 15126.6(f)(3) of the CEQA Guidelines, an EIR need not evaluate an alternative that is considered speculative, theoretical, or unreasonable.

The alternatives studied constitute a reasonable range because they contain enough variation to facilitate informed decision making and public participation that leads to a reasoned choice (CEQA Guidelines, 15126.6[a]-[f]). Also, according to CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient “to allow meaningful evaluation, analysis, and comparison with the project.” Therefore, the significant effects of each alternative are discussed in less detail than those of the proposed project, but in enough detail to provide decision makers with perspective and a reasoned choice among alternatives to the project.

An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. CEQA Guidelines Section 15126.6(e)(2) provides that if the “No Project” alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative among the other alternatives.

The purpose of this chapter is to identify alternatives that would mitigate, lessen, or avoid the potentially significant effects of the proposed project. As described in Chapters 3 through 15 of this EIR, the proposed project would result in significant and unavoidable impacts to aesthetics and tribal cultural resources.

COMPARISON OF ALTERNATIVES

The comparison of alternatives provided in this chapter satisfies the requirements of CEQA Guidelines Section 15126.6(d), Evaluation of Alternatives (14 CCR 15000 et seq.). This comparison does not consider the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the project.

The discussion of the environmentally superior alternative is based on a comparison of significant impacts that would result from the proposed project and the alternatives identified in the EIR. Although this EIR identifies an environmentally superior alternative, CEQA does not require the County to select the environmentally superior alternative for approval. It is possible

that the County could choose to balance the importance of each impact area differently, as well as take into consideration non-environmental factors (e.g., social, economic) and reach a different conclusion during the project approval process. Therefore, the County may approve a project that is not the environmentally superior alternative.

ALTERNATIVES DISMISSED FROM FURTHER EVALUATION

Pursuant to CEQA Guidelines Section 15126.6(c), the alternatives that were considered but rejected as infeasible are briefly discussed below. An alternative may be considered but not carried forward for various reasons, such as not meeting the objective(s) of the project; not being feasible; conditions outside the control of the project applicant (e.g., land ownership, right-of-way acquisition); or other constraints. As stated in CEQA Guidelines Section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility include:

... 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.

The following discussion describes alternatives that were considered, but were ultimately rejected for the factors cited above. After further consideration of the alternatives discussed in the following sections, it was determined that they would not be feasible, would not substantially meet most of the project objectives, or would not avoid or lessen potentially significant adverse impacts that were identified for the proposed project. Therefore, these alternatives have been rejected as viable alternatives.

DISTRIBUTED POWER GENERATION

Distributed power generation projects such as residential rooftop and carport solar projects are necessary to support SMUD's 2030 Zero Carbon Plan goals; SMUD and other developers continue to pursue all of these options. However, meeting the goals and objectives of SMUD's 2030 Zero Carbon Plan solely through locating distributed solar resources within the desired timeframe has been determined to be infeasible. Distributed generation would result in a potential reduction in certain impacts as compared with the proposed project, as this alternative could focus facilities within developed and urbanized areas in order to generate additional energy. While this alternative would result in a net reduction in project impacts as compared with the proposed project, implementing this alternative would be outside the control of, and could not be implemented by the project applicant, SMUD, or the County with a reasonable timeline or cost. Some specific challenges of a large-scale distributed power generation approach include identification of a sufficient number of potential development locations to meet the goals and the extended time associated with assessing each separate site for feasibility of installation, real estate management, permitting, engineering, and contracting. The additional costs associated with a distributed approach would conflict with the project objectives, including: "Provide cost-effective delivery of local utility-scale solar energy to support attainment of SMUD's 2030 Zero Net Carbon Plan targets, and Integrated Resource Plan targets." Additionally, given recent averages for rooftop solar installations, the number of new installations required to deliver up to an additional 200 MW of solar electricity by 2026 render this alternative infeasible from a practical timing perspective. SMUD has documented in the Net Zero Plan and Integrated Resource Plan

that renewable energy goals cannot be met exclusively with rooftop solar. These challenges related to large-scale distributed power generation projects present a barrier to meet the goals of the 2030 Zero Carbon Plan. For these reasons, a distributed power generation approach was determined to be infeasible.

ON-SITE RECONFIGURATION ALTERNATIVE

Once lands with willing partners were identified, preliminary environmental assessments were conducted on-site on the project parcels. Based on the results of these surveys and background research, the conceptual layout of the project site was adjusted to reduce or avoid potential impacts to resources such as the 100-year floodplain and biological resources, including minimizing impacts to aquatic resources within the project site. Additionally, all precontact indigenous sites identified through background research and field inventory have been excluded from the solar development area through project design. Traditionally culturally affiliated Native American tribes have been contacted by the County to provide input on precontact indigenous resources in close proximity to the solar development area, particularly P-34-000250 and P-34-000253. Site visits were also completed with tribal representatives in these areas. The applicant is required to avoid and preserve in place all recorded precontact indigenous archaeological sites, consisting of 14 sites in total, through mitigation required as a part of this EIR. This background research and site investigation resulted in utilization of approximately one-half of the project site to develop the solar development area. In consideration of the site planning work that produced the proposed project layout, the County has determined that an additional on-site reconfiguration alternative is infeasible other than the reconfigurations included as a part of Alternative 1 and Alternative 2.

ALTERNATIVE TECHNOLOGIES

WIND ENERGY

Wind energy is another renewable energy source that could be considered at the proposed project site. Wind is a renewable source of energy, and some of the environmental impacts related to operating a wind farm could be reduced compared to other types of energy-generating facilities. The construction of a wind farm would result in temporary construction-related impacts, as would be expected for the proposed project. Once operational, wind farms do not result in air pollutant emissions (as they are a renewable, non GHG-producing energy source) and water usage requirements are typically low. However, compared to solar generating facilities, wind farms would result in relatively greater aesthetic impacts due to the height of wind turbines. Additionally, unlike the proposed project, wind farms could generate long-term noise impacts and can result in take of avian species, if species collide with turbine blades. For these reasons, this alternative technology was not considered further.

NUCLEAR ENERGY

Nuclear power is a non-fossil fuel energy source (a renewable, non GHG-producing energy source). Unlike solar energy production, nuclear energy does not rely on the availability of the sun. Nuclear power is a controversial power source because it is viewed by the public as dangerous and there are public concerns around the transportation, storage, and disposal of spent reactor fuel. Nuclear power plants are relatively expensive to build and operate compared to other alternative power sources (such as solar and wind power). There is only one actively operating commercial nuclear power plant in California and this facility is owned and operated by Pacific Gas and Electric Company, and is proposed for closure. A new nuclear power plant

is not feasible as an alternative to a utility-scale solar generating facility. Additionally, because of the costs to build, and environmental impacts related to operational impacts such as hazardous and hazardous waste, aesthetics, number of employees working at the site, and other considerations, a nuclear power generating facility would likely result in greater environmental impacts than the proposed project. For these reasons, this alternative technology was not considered further.

ALTERNATIVE SITE(S)

Alternative sites are often considered when developing EIR alternatives with the goal of avoiding or eliminating significant impacts related to the site-specific environmental impacts of a project. Early in the site selection process for the proposed project, alternative locations were explored. Namely, alternative locations within the Sacramento County Urban Services Boundary (USB), sites that had been previously developed, and sites that have minimal land use and environmental resource constraints – with the added requirement that alternative locations, as with the proposed project site, must be located adjacent to existing SMUD transmission facilities with capacity for interconnection.

In order to develop a 200-megawatt (MW) solar energy facility that could support solar-energy generation, energy storage, and the ability to tie into nearby existing SMUD electrical distribution facilities, similar to the proposed project, specific site attributes would be necessary. Development of a solar energy facility that is a similar scale as the proposed project would require certain characteristics, as determined by the project applicant, including purchasing or leasing multiple large parcels (approximately 249 acres or larger), at a location near existing SMUD transmission lines, and on parcels that do not contain prime farmland.

Large parcels of land identified within the USB were not readily available for purchase due to their location or existing uses (e.g., Sacramento International Airport, Folsom State Prison, golf courses, etc.). Large parcels of land identified within Sacramento County but outside of the USB were not readily available for purchase due to their location or existing uses. Other undeveloped and underutilized properties in the County were considered, but were determined to be infeasible for this type of solar development project for a number of reasons, including the fact that Sacramento County has unmet needs for housing and there are efforts underway to provide affordable housing in some of these undeveloped and underutilized areas. To address this shortfall, the County is rezoning and redeveloping underutilized areas within Sacramento County (Sacramento County 2022). In other cases, sites that might represent potential for solar development have been planned for employment-generating projects within the unincorporated County. Throughout this region, finding suitable land available for solar projects is a recognized challenge. Thus, finding other large parcels adjacent to existing transmission lines that would support a utility scale solar project, and that could reduce potentially significant impacts compared to the proposed projects was ultimately infeasible.

A key objective of the project is to optimize use of existing electrical distribution infrastructure. Interconnection to SMUD's existing transmission system would allow the energy generated by the proposed project to be delivered directly to SMUD customers. As discussed above, alternative sites within 75 feet of existing SMUD transmission lines were assessed. Yielding few potential sites, the County ultimately expanded its search to properties within 1,000 feet of existing transmission facilities, **and then to 1.3 miles to align with the length of the proposed project's gen-tie line.** There is a limited supply of land available for utility scale solar projects

near SMUD’s transmission system, which is limited further since many of these areas are already developed, entitled for development, or subject to ongoing land use planning for residential, commercial, and industrial uses. More distant sites not adjacent to SMUD infrastructure were not reviewed further because these sites would increase project costs and would likely increase potential environmental impacts due to the need for a new transmission line route to interconnect the project to SMUD infrastructure farther away from the project site.

Finally, under a scenario where multiple alternative sites were assembled to deliver a similar level of renewable energy as the proposed project would be difficult to permit and develop on a timeline that would meet SMUD’s 2030 Net Zero Plan goals. The project applicant does not own or have the ability to easily acquire other sites in the region in order to provide a viable alternative site location. Developing a solar project that would provide a similar amount of renewable energy, but making use of three, four, five or more sites would increase the amount of required infrastructure in total compared to the use of a single site. This would substantially increase the cost of the project, which could conflict with the project objectives, including: “Provide cost-effective delivery of local utility-scale solar energy to support attainment of SMUD’s 2030 Zero Net Carbon Plan targets, and Integrated Resource Plan targets.” For these reasons, while the County did carefully investigate this potential, an off-site location was determined to be infeasible.

DESCRIPTION OF ALTERNATIVES

NO PROJECT ALTERNATIVE

CEQA requires an evaluation of the No Project alternative so that decision makers can compare the impacts of approving the project with the impacts of not approving the project. According to CEQA Guidelines (Section 15126.6[e]; 14 CCR 15000 et seq.), the No Project alternative must include (a) the assumption that the existing environmental conditions at the time of the Notice of Preparation (NOP) (i.e., baseline environmental conditions) would not be changed since the project would not be installed and (b) the events or actions that would be reasonably expected to occur in the foreseeable future if the project were not approved. The first condition is described in the EIR for each environmental discipline as the “environmental baseline.” This section defines the second condition of reasonably foreseeable actions or events. The impacts of these actions are evaluated in each issue area’s analysis in this EIR.

For the purposes of the No Project alternative, it is assumed the proposed project would not be constructed. For the purposes of the No Project alternative analysis, the applicant would not execute their lease option on the parcels comprising the proposed project site and the existing conditions would likely remain unchanged (i.e., property would remain as agricultural land) and agricultural activities would likely continue.

ALTERNATIVE 1: BIOLOGICAL RESOURCES ALTERNATIVE

Alternative 1 is a proposed approximately 200 MW solar photovoltaic energy-generating facility located in the same general area as the proposed project, but would include shifting approximately 55 acres of solar panels from the proposed project’s solar development area into a 480-acre parcel immediately adjacent to the southwest corner of the proposed project. This 480-acre parcel is not a part of the proposed project site or proposed project solar development

area. Like the proposed project, Alternative 1 would be developed by Sacramento Valley Energy Center, LLC (applicant) to sell electricity and all renewable and environmental attributes to SMUD under long-term contracts to help meet California Renewables Portfolio Standard goals. Under this alternative, the project site would be expanded to include an additional 480-acre property to the southwest of the existing project site. Under this alternative, the project applicant would remove approximately 55 acres of the area within the solar development area in the southern portion of the project site.

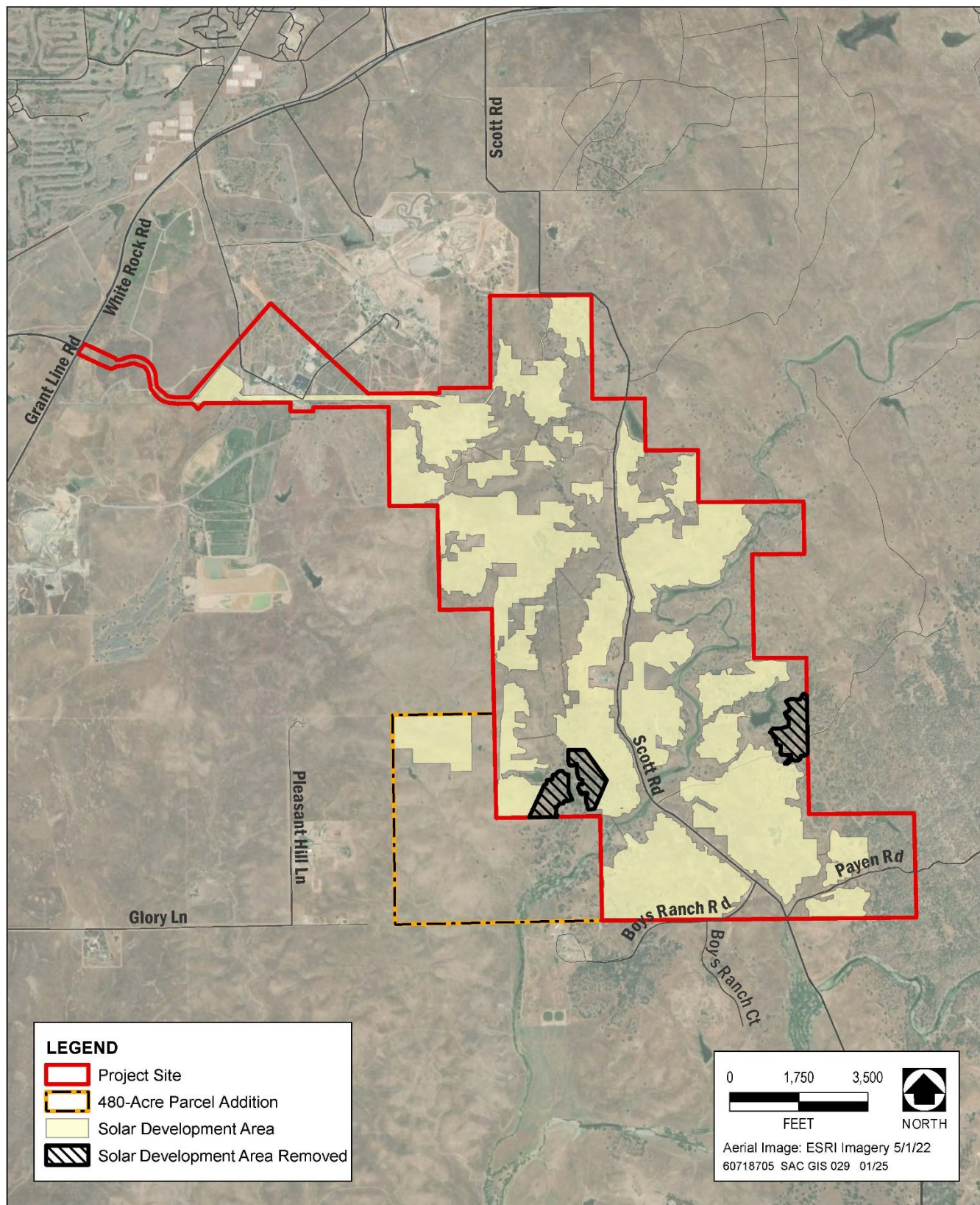
As identified in this EIR, the proposed project would not result in any significant and unavoidable impacts to biological resources with the exception of a cumulatively considerable impact related to oak woodlands. The focus of this alternative design refinement process was to reduce impacts to the amount of trees (including oak species) and the impact to oak woodlands that would be required for the project while accomplishing the basic project objectives.

Alternative 1 includes the same parcels as the proposed project, but the Alternative 1 site includes one additional 480-acre parcel immediately adjacent to southwest of the project site (APN 073-0020-015-0000). Alternative 1 site would increase the total project site acreage by 480 acres (a total of 3,184 acres compared to 2,704 acres) and would have a solar development area of approximately 1,412 acres. Refer to Plate ALT-1 for an illustration of the Alternative 1 site.

The same environmental setting described in Chapter 2, “Project Description”, applies also to Alternative 1. Generally, the Alternative 1 site is within the same topography, land uses and, and zoning as described in Chapter 2 for the proposed project. The facilities for Alternative 1 would be generally the same as those described for the proposed project in Chapter 2. Chapter 2, “Project Description”, describes the energy generation process – this also applies to Alternative 1. The design and construction of the solar arrays, energy storage facilities, and auxiliary facilities (e.g., substation) required for Alternative 1 would be consistent with all applicable County building standards, as required by Sacramento County.

The applicant has entered into an agreement to supply SMUD with the renewable energy for use in the SMUD service area. Alternative 1 would provide approximately the same amount of renewable energy as under the proposed project. The energy storage elements of Alternative 1 would help balance supply and demand by capturing and storing renewable energy generated during daylight hours to meet peak evening demand.

Plate ALT-1: Alternative 1 – Biological Resources Alternative



ALTERNATIVE 2: SCOTT ROAD BUFFER ALTERNATIVE

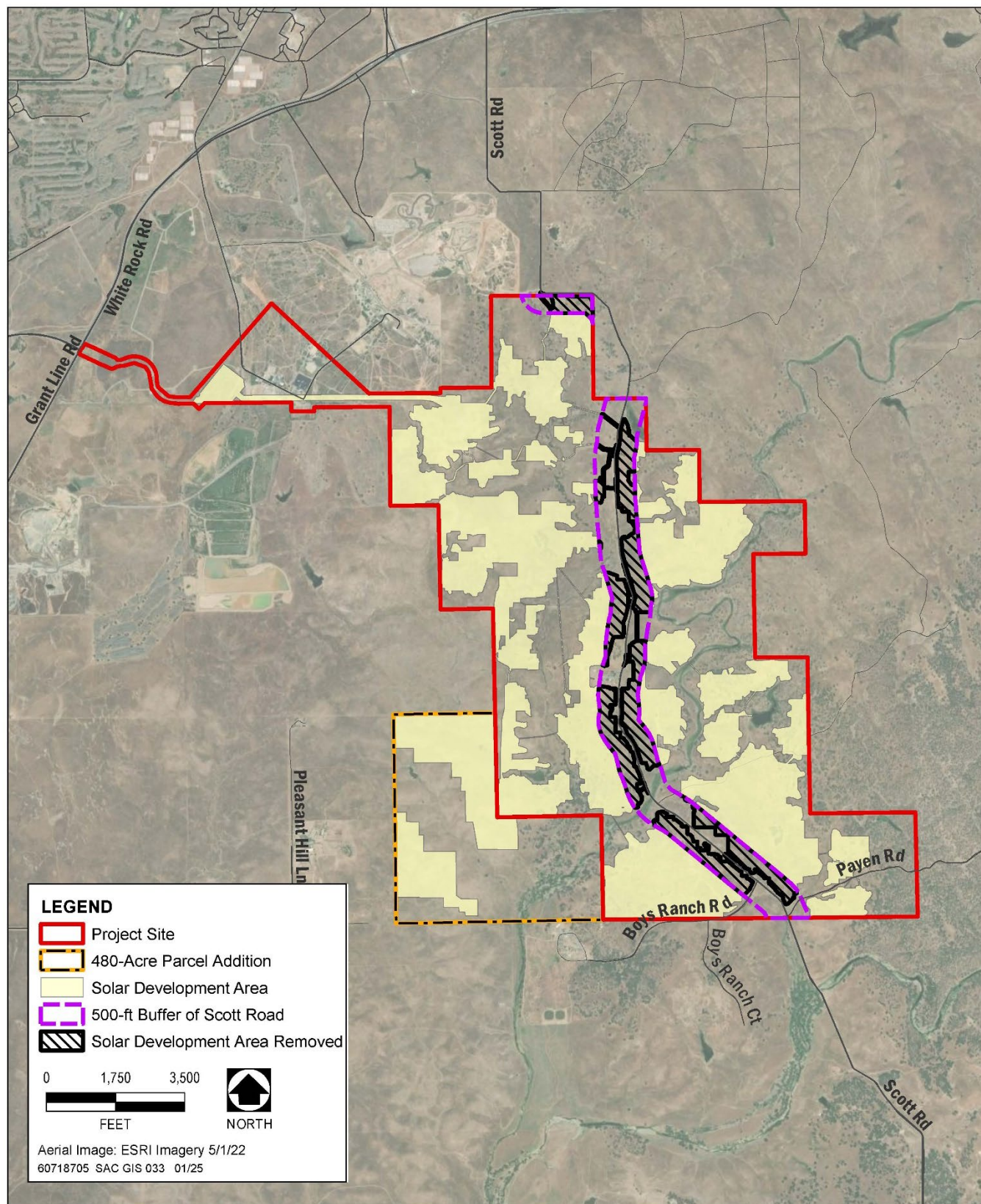
The proposed project, as detailed in this EIR, would affect existing views available along Scott Road. The Circulation Element of the Sacramento County General Plan identifies Scott Road as warranting scenic corridor protection (Sacramento County General Plan, page 36). Policy CI-58 indicates that the County will “[c]ontinue to provide scenic corridor protection for Scott Road from White Rock Road south to Latrobe Road.” The impact to views from Scott Road is significant and unavoidable under the proposed project.

In the County’s Zoning Code, “[t]he scenic corridor for a scenic highway or scenic country route shall include a horizontal distance of 500 feet on each side of the center line with a minimum distance of 300 feet beyond the right-of-way or the edge of the stream” (Sacramento County Zoning Ordinance, Chapter 7, page 7-45). Under Alternative 2, a 500-foot buffer would be applied from the centerline of Scott Road in each direction. Alternative 2 would not include any portion of the solar development area within 500 feet of the centerline of Scott Road, with the intent to reduce visual effects from this viewing location. This would result in the removal of approximately 181 acres of solar development area that, under the proposed project, would be within 500 feet of the centerline of Scott Road.

Similar to Alternative 1, additional solar development area under Alternative 2 would be added to a property that is southwest of the proposed project site so that Alternative 2 would have approximately the same acreage in solar development area as under the proposed project. Approximately 181 acres of solar development area would be located on this 480-acre parcel (APN 073-0020-015-0000), which would be added to the Alternative 2 site. Refer to Plate ALT-2 for an illustration of the Alternative 2 site.

The same environmental setting described in Chapter 2, “Project Description”, applies also to Alternative 2. Generally, the Alternative 2 site is within the same topography, land uses and, and zoning as described in Chapter 2 for the proposed project. The facilities for Alternative 2 would be generally the same as those described for the proposed project in Chapter 2. Chapter 2, “Project Description”, describes the energy generation process – this also applies to Alternative 2. The design and construction of the solar arrays, energy storage facilities, and auxiliary facilities (e.g., substation) required for Alternative 2 would be consistent with all applicable County building standards, as required by Sacramento County.

The applicant has entered into an agreement to supply SMUD with the renewable energy for use in the SMUD service area. Alternative 2 would provide approximately the same amount of renewable energy as under the proposed project. The energy storage elements of Alternative 2 would help balance supply and demand by capturing and storing renewable energy generated during daylight hours to meet peak evening demand.

Plate ALT-2: Alternative 2 – Scott Road Buffer Alternative

EVALUATION OF ALTERNATIVES

Table ALT-1 presents a comparative analysis between the ~~proposed project~~ **Reduced Footprint Project** and the No Project Alternative, Alternative 1, and Alternative 2.

Table ALT-1: Alternatives Analysis

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Aesthetics	<p>Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would be no potential for adverse impacts to scenic vistas, damage to scenic resources within a scenic roadway corridor, substantial degradation of visual character, or adverse daytime glare effects. Thus, the level of all aesthetics impacts would be reduced.</p>	<p>The tops of a few of the trees that would be preserved under Alternative 1 on the west side of Scott Road would be visible to motorists traveling along approximately 1,100 feet of the roadway; however, due to the rolling topography views of the trees from this public vantage point are generally blocked. With regards to the trees that would be preserved on the east side of Scott Road, due to the distance (approximately 0.75 mile) and the rolling topography, the trees are not visible from any public vantage points including Scott Road. Therefore, Alternative 1 would result in a similar level of impact from damage to scenic resources within a scenic roadway corridor, degradation of visual character, and potential glare effects along Scott Road.</p> <p>Because Alternative 1 would result in the same number of solar panels and a substation in the same locations within the viewshed from the Prairie City SVRA, the level of impact to the scenic vista, visual character as viewed from the SVRA, and creation of new glare effects for recreationists with the SVRA would be similar.</p> <p>Because the equivalent amount of Additional solar panels and associated fencing and access roads that would be located on a would be shifted to the 480-acre parcel to the southwest of the project site under Alternative 1. However, this area would not be visible from any public viewpoint under Alternative 1, there would be no adverse impacts to scenic vistas, damage to scenic resources within a scenic roadway corridor, substantial degradation of visual character, or adverse daytime glare effects from public viewpoints of this parcel. However, new solar panels would be installed approximately 1,000 feet at the closest point (nearly one-quarter mile) west of two existing rural residences on Pleasant Hill Lane. At this distance, the solar panels would be visible in the middleground, not the foreground. Because the topography in the 480-acre parcel is lower than the residences on Pleasant Hill Lane, background views of the Sierra to the east would be preserved. Under CEQA, a lead agency is not required to evaluate potential visual changes from private viewpoints (<i>Mira Mar Mobile Community v. City of Oceanside</i>,</p>	<p>Because Alternative 2 would implement a 500-foot buffer zone on both sides of Scott Road through the project site where no solar panels would be installed, the level of impact to scenic resources within a scenic roadway corridor (Scott Road), substantial degradation of visual character along Scott Road, and from potential glare effects along Scott Road would be substantially reduced (but would remain Significant and Unavoidable, similar to the proposed project).</p> <p>Because Alternative 2 would result in the same number of solar panels and a substation in the same locations within the viewshed from the Prairie City SVRA, the level of impact to the scenic vista, visual character as viewed from the SVRA, and creation of new glare effects for recreationists with the SVRA would be similar.</p> <p>Because the equivalent amount of solar panels and associated fencing and access roads that would be developed within the new 480-acre parcel to the southwest would not be visible from any public viewpoint under Alternative 2, there would be no adverse impacts to scenic vistas, damage to scenic resources within a scenic roadway corridor, substantial degradation of visual character, or adverse daytime glare effects from public viewpoints of this parcel. Additional solar panels and associated fencing and access roads would be located on a 480-acre parcel to the southwest of the project site under Alternative 2. However, this area would not be visible from any public viewpoint, and under Alternative 2, there would be no adverse impacts to scenic vistas, damage to scenic resources within a scenic roadway corridor, substantial degradation of visual character, or adverse daytime glare effects from public viewpoints of this parcel. However, new solar panels would be installed approximately 1,000 feet at the nearest point (nearly one-quarter mile) west of two existing rural residences on Pleasant Hill Lane. At this distance, the solar panels would be visible in the middleground, not the foreground. Because the topography in the 480-acre parcel is lower than the residences on Pleasant Hill Lane,</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		119 Cal. App. 4th 477 [Cal. Ct. App. 2004]). Nevertheless, for purposes of disclosure, it is noted that the changes that would occur in middleground views to the east from the private residences on Pleasant Hill Lane under Alternative 1 would represent an increased level of impact related to substantial degradation of the existing visual character and quality and potential daytime glare effects.	background views of the Sierra to the east would be preserved. For purposes of disclosure, it is noted that the changes that would occur in middleground views to the east from the private residences on Pleasant Hill Lane under Alternative 2 would represent an increased level of impact related to substantial degradation of the existing visual character and quality and potential daytime glare effects.
Agriculture and Forestry Resources	Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would no potential for adverse impacts from conversion of agricultural land (i.e., more than 50 acres of grazing land outside the USB) to non-agricultural use. Thus, the level of impact would be reduced.	Alternative 1 would result in a greater the same overall amount of grazing land outside the USB used for solar development; thus, there would be a greater similar level of impact from conversion of agricultural land to non-agricultural use.	Alternative 2 would result in a greater the same overall amount of grazing land outside the USB used for solar development; thus, there would be a greater similar level of impact from conversion of agricultural land to non-agricultural use.
Air Quality	Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would no potential for adverse impacts from conflicts with the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, expose sensitive receptors to substantial pollutant concentrations (i.e., toxic air contaminants and naturally occurring asbestos), and exposure of sensitive receptors to odor emissions during construction. Thus, the level of impact would be reduced .	Alternative 1 would result in the same a greater overall amount and type of solar facilities construction and operation in the same general area. Thus, there would be a greater similar level of impact from conflicts with the applicable air quality plan, and from contributions to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Because Alternative 1 would result in construction emissions associated with solar panels, fencing, and access roads on the 480-acre southwest parcel within 1,000 feet of two existing rural residences on Pleasant Hill Lane, there would be an increased level of impact from potential exposure of sensitive receptors to substantial pollutant concentrations (i.e., toxic air contaminants and naturally occurring asbestos) during construction, and potential exposure of sensitive receptors to odor emissions during construction.	Alternative 2 would result in the same a greater overall amount and type of solar facilities construction and operation in the same general area. Thus, there would be a greater similar level of impact from conflicts with the applicable air quality plan, and from contributions to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Because Alternative 2 would result in construction emissions associated with solar panels, fencing, and access roads on the additional 480-acre parcel within 1,000 feet of two existing rural residences on Pleasant Hill Lane, there would be an increased level of impact from potential exposure of sensitive receptors to substantial pollutant concentrations (i.e., toxic air contaminants and naturally occurring asbestos) during construction, and potential exposure of sensitive receptors to odor emissions during construction.
Biological Resources	Under this alternative, the proposed solar development would not be constructed or developed, and the site would continue to be used for rangeland. Therefore, there would be no potential for adverse impacts related to loss and degradation of habitat for special-status species and potential take of individual and there would be	Impacts related to habitat modifications or impacts to special-status species would generally be similar to the proposed project under this alternative. The same number of solar panels would be installed under this alternative, but they would be reconfigured to avoid some of the heavily wooded areas in the eastern and southwestern portions of the project site	Impacts related to habitat modifications or impacts to special-status species would generally be similar to the proposed project under this alternative. The same number of solar panels would be installed under this alternative, but they would be reconfigured to avoid a 500-foot buffer on both sides of Scott Road and the displaced panels would be added to a

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
	<p>no potential for adverse impacts related to loss or degradation of riparian habitat or other sensitive natural communities, include oak woodland.</p> <p>Additionally, under the No Project Alternative, there would be no potential for adverse impacts related to effects related to removal, fill, or hydrologic disruption of state or federally protected wetlands and would not interfere with wildlife corridors or wildlife nursery sites.</p> <p>Finally, under the No Project Alternative, conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or conflicts with the provisions of an adopted HCP, Natural Community Conservation Plan, or other approved Local, Regional, or State HCP would not occur because no project-related construction or development would occur under this alternative.</p> <p>Thus, the level of impact related to biological resources would be reduced compared to the proposed project.</p>	<p>and the displaced panels would be added to a parcel outside of the proposed project site to the southwest. As with the proposed project, gGround-disturbing activities during construction of Alternative 1 would result in the temporary and permanent removal of, or degradation (e.g., through erosion or sedimentation) to habitats that are potentially suitable for and/or known to be occupied by special-status plants and wildlife. Mitigation Measure BR-1a (Construction Best Management Practices to Avoid and Minimize Potential for Construction-Related Impacts on Special-Status Plants and Wildlife) would be required during construction and decommissioning of Alternative 1, similar to the proposed project.</p> <p>Impacts related to the following species would generally be similar to the proposed project and all mitigation measures required for the proposed project would apply to Alternative 1: special status plants (Mitigation Measure BR-1b: Avoid, Minimize, and Mitigate for Impacts on Special-Status Plants would also apply to Alternative 1); Western Spadefoot (Mitigation Measure BR-1c: Avoid, Minimize, and Mitigate for Impacts on Western Spadefoot would also apply to Alternative 1); Northwestern Pond Turtle (Mitigation Measure BR-1d: Avoid, Minimize, and Mitigate for Impacts on Northwestern Pond Turtle would also apply to Alternative 1); Tricolored Blackbird (Mitigation Measure BR-1g: Avoid, Minimize, and Mitigate for Impacts on Tricolored Blackbird would apply to Alternative 1); Other Nesting Raptors and Migratory Birds (Mitigation Measure BR-1k: Avoid, Minimize, and Mitigate for Impacts on Nesting Raptors and Migratory Birds would apply to Alternative 1); Crotch's Bumble Bee (Mitigation Measure BR-1m: Avoid, Minimize, and Mitigate for Impacts on Crotch's Bumble Bee would apply to Alternative 1); and Monarch Butterfly.</p> <p>Impacts related to the following species would generally be increased under Alternative 1 than the proposed project and all mitigation measures required for the proposed project would apply to Alternative 1: Burrowing owl due to a slight increase in impacts to grasslands (and a slight decrease in blue oak savanna impacts) in the parcel southwest of the project site where panels would be added under</p>	<p>parcel outside of the proposed project site to the southwest. As with the proposed project, gGround-disturbing activities during construction of Alternative 2 would result in the temporary and permanent removal of, or degradation (e.g., through erosion or sedimentation) to habitats that are potentially suitable for and/or known to be occupied by special-status plants and wildlife. Mitigation Measure BR-1a (Construction Best Management Practices to Avoid and Minimize Potential for Construction-Related Impacts on Special-Status Plants and Wildlife) would be required during construction and decommissioning of Alternative 2, as with the proposed project.</p> <p>Impacts related to the following species would generally be similar to the proposed project and all mitigation measures required for the proposed project would apply to Alternative 2: special status plants (Mitigation Measure BR-1b: Avoid, Minimize, and Mitigate for Impacts on Special-Status Plants would also apply to Alternative 2); Western Spadefoot (Mitigation Measure BR-1c: Avoid, Minimize, and Mitigate for Impacts on Western Spadefoot would also apply to Alternative 2); Tricolored Blackbird (Mitigation Measure BR-1g: Avoid, Minimize, and Mitigate for Impacts on Tricolored Blackbird would apply to Alternative 2); Other Nesting Raptors and Migratory Birds (Mitigation Measure BR-1k: Avoid, Minimize, and Mitigate for Impacts on Nesting Raptors and Migratory Birds would apply to Alternative 2); Crotch's Bumble Bee (Mitigation Measure BR-1m: Avoid, Minimize, and Mitigate for Impacts on Crotch's Bumble Bee would apply to Alternative 2); and Monarch Butterfly.</p> <p>Impacts related to the following species would generally be increased under Alternative 2 compared to the proposed project and all mitigation measures required for the proposed project would also apply to Alternative 2: Burrowing owl due to a slight increase in impacts to grasslands (and a slight decrease in blue oak savanna impacts) in the parcel southwest of the project site where panels would be added under this alternative (Mitigation Measure BR-1e: Avoid, Minimize, and Mitigate for Impacts on Western Burrowing Owl and Occupied Nesting</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		<p>this alternative (Mitigation Measure BR-1e: Avoid, Minimize, and Mitigate for Impacts on Western Burrowing Owl and Occupied Nesting Habitat would apply to Alternative 1), Foraging Habitat for Swainson's Hawk (due to the slight increase in impacts to grasslands) in the parcel southwest of the project site where panels would be added under this alternative (Mitigation Measure BR-1f: Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and their Nesting and Foraging Habitat would apply to Alternative 1); Special-Status Aquatic Invertebrates due to the two SSHCP-mapped vernal pools and one SSHCP-mapped swale in the parcel southwest of the project site where panels would be added under this alternative (these conditions have not been field-verified, Mitigation Measure BR-1i: Avoid, Minimize, and Mitigate for Impacts on Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp) however, it is likely that panels in this area could be designed to avoid these vernal pools and swales; and American Badger due to the slight increase in impacts to grasslands (and a slight decrease in blue oak savanna impacts) in the parcel southwest of the project site where panels would be added under this alternative (Mitigation Measure BR-1j: Avoid, Minimize, and Mitigate for Impacts on American Badger would apply to Alternative 1).</p> <p>Impacts related to the following species would generally be reduced similar under Alternative 1 than the proposed project and all mitigation measures required for the proposed project would apply to Alternative 1: Nesting Habitat for Swainson's Hawk (due to the slight decrease in impacts to oak woodland) by relocating some of the panels in the parcel southwest of the project site where panels would be added under this alternative (Mitigation Measure BR-1f: Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and their Nesting and Foraging Habitat would apply to Alternative 1); Valley Elderberry Longhorn Beetle and Their Habitat (due to the slight decrease in impacts to riparian areas) by relocating some of the panels in the parcel southwest of the project site where panels would be added under this alternative in predominantly grassland areas (Mitigation Measure BR-1h: Avoid, Minimize, and Mitigate for Impacts on Valley Elderberry Longhorn Beetle and Their Habitat); and</p>	<p>Habitat would apply to Alternative 2), Foraging Habitat for Swainson's Hawk (due to the slight increase in impacts to grasslands in the parcel southwest of the project site where panels would be added under this alternative) (Mitigation Measure BR-1f: Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and their Nesting and Foraging Habitat would apply to Alternative 2); and American Badger due to the increase in impacts to grasslands (and a decrease in blue oak savanna impacts) in the parcel southwest of the project site where panels would be added under this alternative (Mitigation Measure BR-1j: Avoid, Minimize, and Mitigate for Impacts on American Badger would apply to Alternative 2).</p> <p>Impacts related to the following species would generally be similar reduced under Alternative 2 compared to the proposed project and all mitigation measures required for the proposed project would apply to the Alternative 2: Northwestern Pond Turtle (Mitigation Measure BR-1d: Avoid, Minimize, and Mitigate for Impacts on Northwestern Pond Turtle would also apply to Alternative 2); Nesting Habitat for Swainson's Hawk (due to the slight decrease in impacts to oak woodland) by relocating some of the panels in the parcel southwest of the project site (Mitigation Measure BR-1f: Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and their Nesting and Foraging Habitat would apply to Alternative 2); and Valley Elderberry Longhorn Beetle and Their Habitat (due to the slight decrease in impacts to riparian areas) by relocating some of the panels in the parcel southwest of the project site in predominantly grassland areas (Mitigation Measure BR-1h: Avoid, Minimize, and Mitigate for Impacts on Valley Elderberry Longhorn Beetle and Their Habitat); Special-Status Aquatic Invertebrates impacts would increase due to the reduced impacts to aquatic features within the 500-foot buffer on either side of Scott Road; however, there would be two SSHCP-mapped vernal pools and two SSHCP-mapped swales in the parcel southwest of the project site where panels would be added under this alternative (these conditions have not been field-verified, Mitigation Measure BR-1i: Avoid, Minimize, and Mitigate for Impacts on Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp); however, it is</p>

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		<p>Native Bats (due to some of the panels being removed from areas near aquatic features and relocated to grassland areas in the new parcel) (Mitigation Measure BR-1l: Avoid, Minimize, and Mitigate for Impacts on Bats would apply to Alternative 1).</p> <p>In the additional parcel southwest of the project site where panels would be added under this alternative, there are two SSHCP-mapped vernal pools and one SSHCP-mapped swale where the solar development would occur which could support special status invertebrates (these conditions have not been field-verified). However, it is likely that panels in this area could be designed to avoid these vernal pools and swales. Mitigation Measure BR-1l: Avoid, Minimize, and Mitigate for Impacts on Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp) and Mitigation Measure BR-3: Avoid, Minimize, Restore, and Mitigate for Impacts on State and Federally Protected Wetlands and Other Waters, including Riparian Habitat, through the Development and Implementation of an Aquatic Resources Mitigation Plan would apply to Alternative 1. This impact may be slightly increased compared to the proposed project.</p> <p>Alternative 1 would impact a similar number of approximately 1,200 fewer trees than the proposed project, resulting in removal of approximately 3,590 trees compared to 4,787 trees. T and thus, would have a similar reduced impact on oak woodlands compared to the proposed project. Mitigation Measure BR-2a: Avoid, Minimize, and Mitigate for Impacts on Riparian Habitat and Other Sensitive Natural Communities and Mitigation Measure BR-2b: Preserve Oak Woodlands and Special-Status Wildlife Habitat would apply to Alternative 1.</p> <p>The impacts to mapped National Wetlands Inventory (NWI) or National Hydrography Dataset (NHD) features would be similar for Alternative 1 compared to the proposed project.</p> <p>However, as mentioned above, in the parcel southwest of the project site where panels would be added under this alternative, there are two SSHCP-mapped vernal pools and one SSHCP-mapped swale where the solar development would occur</p>	<p>likely that panels in this area could be designed to avoid these vernal pools and swales; and Native Bats (due to some of the panels being removed from areas near aquatic features and relocated to grassland areas in the new parcel) (Mitigation Measure BR-1l: Avoid, Minimize, and Mitigate for Impacts on Bats would apply to Alternative 2).</p> <p>There are aquatic features (indicated by mapping completed by Dudek, 2023) within 500 feet on either side of Scott Road that would be impacted by the development of the proposed project that would be avoided by Alternative 2 development. There are no mapped NWI or NHD features in the 480-acre parcel addition southwest of the project site where 181 acres of solar panels would be added relocated under this alternative (these conditions have not been field-verified). However, in the additional southwest parcel, there are two SSHCP-mapped vernal pools and two SSHCP-mapped swales where the solar development would occur (these conditions have not been field-verified). It is likely that panels in this area could be designed to avoid these vernal pools and swales. Mitigation Measure BR-3: Avoid, Minimize, Restore, and Mitigate for Impacts on State and Federally Protected Wetlands and Other Waters, including Riparian Habitat, through the Development and Implementation of an Aquatic Resources Mitigation Plan would apply to Alternative 2. This impact may be reduced compared to the proposed project.</p> <p>A large portion of the habitat types within the 500-foot buffer of Scott Road that would be avoided under Alternative 2 is categorized as <u>oak forest and oak woodland</u> blue oak savanna and the added 181 acres of solar panels in the 480-acre southwest additional parcel is categorized as valley grassland. Therefore, Alternative 2 would impact fewer trees than the proposed project, and would shift solar panels into valley grassland areas with fewer trees. Thus, Alternative 2 would have a reduced impact on oak woodlands compared to the proposed project, <u>though the cumulatively considerable temporal impact would still be significant and unavoidable</u>. Mitigation Measure BR-2a: Avoid, Minimize, and Mitigate for Impacts on Riparian Habitat and Other Sensitive Natural Communities</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		<p>(these conditions have not been field-verified). It is likely that panels in this area could be designed to avoid these vernal pools and swales. Mitigation Measure BR-3: Avoid, Minimize, Restore, and Mitigate for Impacts on State and Federally Protected Wetlands and Other Waters, including Riparian Habitat, through the Development and Implementation of an Aquatic Resources Mitigation Plan would apply to Alternative 1. Therefore, this impact would be slightly increased for Alternative 1 compared to the proposed project.</p> <p>Alternative 1 would have a similar impact compared to the proposed project related to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites. Implementation of Mitigation Measures AG-1 (Implement the Agricultural Management Plan), BR-1e (Avoid, Minimize, and Mitigate for Impacts on Western Burrowing Owl and Occupied Nesting Habitat), and BR-1f (Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and Their Nesting and Foraging Habitat) would apply to Alternative 1. Similar to the proposed project, the development related to Alternative 1 would also have limited impact on the riparian corridors surrounding the solar development area, which provide local and regional habitat connections and habitat for special status species. The functions along the identified Coyote Creek essential habitat connectivity area, including the Carson Creek corridor, would be maintained with Alternative 1 implementation.</p> <p>Alternative 1 would have a similar impact compared to the proposed project related to conflicts with any local policies or ordinance protection biological resources. Alternative 1 would be consistent with applicable plans, policies, and ordinances and Mitigation Measure BR-5 (Address Inconsistencies with Local Policies Protecting Biological Resources) would apply to Alternative 1 to address any inconsistencies.</p> <p>Alternative 1 would have a similar impact compared to the proposed project related to conflicts with the provisions of an adopted HCP, Natural Community Conservation Plan, or Other Approved Local,</p>	<p><u>and Mitigation Measure BR-2b: Preserve Oak Woodlands and Special-Status Wildlife Habitat</u> would apply to Alternative 2.</p> <p>The impacts to mapped NWI or NHD features would be reduced for Alternative 2 compared to the proposed project.</p> <p>There are aquatic features (indicated by mapping completed by Dudek, 2023) within 500 feet on either side of Scott Road that would be impacted by the development of the proposed project that would be avoided by Alternative 2 development. There are no mapped NWI or NHD features in the 480-acre parcel addition southwest of the project site where 181 acres of solar panels would be added relocated under this alternative (these conditions have not been field-verified). However, as mentioned above, in the additional southwest parcel, there are two SSHCP-mapped vernal pools and two SSHCP-mapped swales where the solar development would occur (these conditions have not been field-verified). It is likely that panels in this area could be designed to avoid these vernal pools and swales. Mitigation Measure BR-3: Avoid, Minimize, Restore, and Mitigate for Impacts on State and Federally Protected Wetlands and Other Waters, including Riparian Habitat, through the Development and Implementation of an Aquatic Resources Mitigation Plan would apply to Alternative 2. Therefore, this impact would be reduced for Alternative 2 compared to the proposed project.</p> <p>Alternative 2 would have a similar impact compared to the proposed project related to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites. Implementation of Mitigation Measures AG-1 (Implement the Agricultural Management Plan), BR-1e (Avoid, Minimize, and Mitigate for Impacts on Western Burrowing Owl and Occupied Nesting Habitat), and BR-1f (Avoid, Minimize, and Mitigate for Impacts on Swainson's Hawk and Their Nesting and Foraging Habitat) would apply to Alternative 2. Similar to the proposed project, the development related to Alternative 2 would also have limited impact on the riparian corridors surrounding</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		<p>Regional, or State HCP.</p> <p>The majority of the solar development area for Alternative 1 is located outside of the Urban Development Area (UDA) and solar development is not a covered activity under the SSHCP. Therefore, similar to the project, Alternative 1 would not be subject to receive take coverage under the SSHCP and is not required to implement or comply with the provisions of the SSHCP.</p> <p>The Alternative 1 solar development area would have a slightly larger area within PPU 1 and the UDA than the proposed project (approximately 55 acres more). Similar to the proposed project, Alternative 1 would be consistent with provisions of the SSHCP because it would include mitigation measures that are consistent with all relevant general and Covered Species AMMs from the SSHCP. Alternative 1 development would not substantially affect the ability to implement the Conservation Strategy as it would allow sufficient habitat acreages to remain regionally to meet the preserve planning needs of the SSHCP. Furthermore, the Alternative 1 solar development area would be decommissioned after the project's 35-year lifespan and may return to existing conditions within the 50-year permit term of the SSHCP. Therefore, the potential conflict of project development with provisions of the SSHCP would be similar to the proposed project.</p>	<p>the solar development area, which provide local and regional habitat connections and habitat for special status species. The functions along the identified Coyote Creek essential habitat connectivity area, including the Carson Creek corridor, would be maintained with Alternative 2 implementation.</p> <p>Alternative 2 would have a similar impact compared to the proposed project related to conflicts with any local policies or ordinance protection biological resources. Alternative 2 would be consistent with applicable plans, policies, and ordinances and Mitigation Measure BR-5 (Address Inconsistencies with Local Policies Protecting Biological Resources) would apply to Alternative 2 to address any inconsistencies.</p> <p>Alternative 2 would have a similar impact compared to the proposed project related to conflicts with the provisions of an adopted HCP, Natural Community Conservation Plan, or Other Approved Local, Regional, or State HCP. The majority of the solar development area for Alternative 2 is located outside of the UDA and solar development is not a covered activity under the SSHCP. Therefore, similar to the project, Alternative 2 would not be subject to receive take coverage under the SSHCP and is not required to implement or comply with the provisions of the SSHCP.</p> <p>The Alternative 2 solar development area would have a larger area within PPU 1 and the UDA than the proposed project (approximately 181 acres more). Similar to the proposed project, Alternative 2 would be consistent with provisions of the SSHCP because it would include mitigation measures that are consistent with all relevant general and Covered Species AMMs from the SSHCP. Alternative 2 development would not substantially affect the ability to implement the Conservation Strategy as it would allow sufficient habitat acreages to remain regionally to meet the preserve planning needs of the SSHCP. Furthermore, the Alternative 2 solar development area would be decommissioned after the project's 35-year lifespan and may return to existing conditions within the 50-year permit term of the SSHCP. Therefore, the potential conflict of project development with provisions of the SSHCP would be</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative similar to the proposed project.
Cultural and Paleontological Resources	Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would be no potential for construction activities to cause a substantial adverse change in the significance of an archaeological resource, disturb human remains, or damage or destroy unique paleontological resources would be reduced .	<p>Most of the 480-acre parcel to the southwest under Alternative 1 was included in the study area evaluated in the cultural resources analysis for the proposed project and is anticipated to have a similar level of sensitivity within as the solar development area under the proposed project since the additional parcel is directly adjacent to the proposed project site. Construction of solar panels, fencing, and access roads in this parcel under Alternative 1 would result in a similar level of impact from the potential to cause a substantial adverse change in the significance of an archaeological resource or disturb human remains.</p> <p>The southern portion of the project site where solar panels would not be installed under Alternative 1 is composed of the Salt Springs Slate formation, which is not paleontologically sensitive. Under Alternative 1, the solar panels, fencing, and access roads that would be installed on the 480-acre parcel to the southwest would be constructed in the Mehrten and Valley Springs Formations. The Mehrten Formation is considered to be of high paleontological sensitivity (see Table CR-2). Therefore, Alternative 1 would result in an increased level of impact from potential damage to or destruction of unique paleontological resources, but that likely could be addressed through mitigation.</p>	<p>Most of the 480-acre parcel to the southwest under Alternative 2 was included in the study area evaluated in the cultural resources analysis for the proposed project and is anticipated to have a similar level of sensitivity within as the solar development area under the proposed project since the additional parcel is directly adjacent to the proposed project site. Construction of solar panels, fencing, and access roads in this parcel under Alternative 2 would result in a similar level of impact from the potential to cause a substantial adverse change in the significance of an archaeological resource or disturb human remains.</p> <p>Scott Road through the project site, including the 500-foot buffer that would be implemented under Alternative 2, consists of the Salt Springs Slate and Gopher Ridge Volcanics formations. These formations are not paleontologically sensitive. Under Alternative 2, the solar panels, fencing, and access roads that would be installed on the 480-acre parcel to the southwest would be constructed in the Mehrten and Valley Springs Formations. The Mehrten Formation is considered to be of high paleontological sensitivity (see Table CR-2). Therefore, Alternative 2 would result in an increased level of impact from potential damage to or destruction of unique paleontological resources, but that likely could be addressed through mitigation.</p>
Geology and Soils	Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would no potential for geologic and soils hazards related to strong seismic ground shaking, liquefaction, soil erosion, unstable soil, soil expansion, and soil suitability for septic systems. Thus, the level of impact would be reduced .	Alternative 1 would result in an increased the same overall amount and type of solar facilities construction and operation in the same general area and the same soil types, including the 480-acre southwest parcel. Thus, there would be an increased a similar level of impact related to strong seismic ground shaking, liquefaction, soil erosion, unstable soil, soil expansion, and soil suitability for septic systems.	Under Alternative 2, removing solar development from the 500-foot buffer along Scott Road through the project site and placing it within the 480-acre southwest parcel would reduce the hazard from soil expansion (because the soils in the southwest parcel where solar development would occur have a low expansion potential). There would be a similar level of impact related to strong seismic ground shaking, liquefaction, soil erosion, unstable soil, and soil suitability for septic systems
Greenhouse Gas Emissions and Energy	Because the proposed solar project would not be implemented, there would no generation of greenhouse gases (GHGs) from construction activities, and therefore a reduced level of impact	As with the proposed project, Alternative 1 would provide support for the attainment of the SMUD 2030 Zero Net Carbon Plan target, which aims to reach zero carbon emissions in the SMUD power supply by	As with the proposed project, Alternative 2 would provide support for the attainment of the SMUD 2030 Zero Net Carbon Plan target, which aims to reach zero carbon emissions in the SMUD power supply by

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
	<p>from potential cumulative climate change effects related to generation of GHGs. There would also be a reduced potential for wasteful, inefficient, or unnecessary consumption of energy resources during project construction. However, the net benefit to the region from increased energy production by directly supporting State plans for renewable energy during project operation would not occur.</p>	<p>2030. As a solar energy generating facility, the proposed project and Alternative 1 would generate approximately the same amount of electricity from a GHG-free source and operational GHG emissions would be limited (similar impact). However, as with the proposed project, under Alternative 1, GHGs would also be emitted as a result of short-term project construction and decommissioning activities. Because an increased the same amount of construction and decommissioning would occur, Alternative 1 would result in an increased a similar level of impact to cumulative climate change from construction-related generation of GHGs.</p> <p>Because an increased the same amount of construction would occur, Alternative 1 would result in an increased a similar consumption of energy during construction as compared to the proposed project. Under Alternative 1, an increased the same amount of energy would be generated during operation of the solar facilities as the proposed project. Therefore, similar to the proposed project, Alternative 1 would help to meet existing energy demands and would not result in the establishment of new electrical service to currently unserved areas. Similar to the proposed project, Alternative 1 would not result in wasteful, inefficient, or unnecessary consumption of energy resources and would result in a net increase in the region's energy resources by supporting State plans for renewable energy.</p>	<p>2030. As a solar energy generating facility, the proposed project and Alternative 2 would generate approximately the same amount of electricity from a GHG-free source and operational GHG emissions would be limited (similar impact). However, as with the proposed project, under Alternative 2, GHGs would also be emitted as a result of short-term project construction and decommissioning activities. Because an increased the same amount of construction and decommissioning would occur, Alternative 2 would result in an increased a similar level of impact to cumulative climate change from construction-related generation of GHGs.</p> <p>Because an increased the same amount of construction would occur, Alternative 2 would result in an increased a similar consumption of energy during construction as compared to the proposed project. Under Alternative 2, an increased the same amount of energy would be generated during operation of the solar facilities as the proposed project. Therefore, similar to the proposed project, Alternative 2 would help to meet existing energy demands and would not result in the establishment of new electrical service to currently unserved areas. Similar to the proposed project, Alternative 2 would not result in wasteful, inefficient, or unnecessary consumption of energy resources and would result in a net increase in the region's energy resources by supporting State plans for renewable energy.</p>
Hazards and Hazardous Materials	<p>Because the existing ranching activities would continue and the proposed project would not be implemented, there would no potential hazards from routine transport, use, or disposal of hazardous materials or reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, no potential hazard from development on a Cortese-listed site (i.e., the Aerojet contaminated groundwater plume), no potential for airspace hazards associated with Mather Airport flight paths due to tall structures, and no potential to interfere with an adopted emergency evacuation plan. Therefore, the level of impact would be reduced.</p>	<p>Shifting The placement of approximately 55 acres of solar development under Alternative 1 to the southwest 480-acre parcel would result in a greater the same amount of solar facilities development, and would result in a greater similar level of impact from potential hazards from routine transport, use, or disposal of hazardous materials or reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, development on a Cortese-listed site (i.e., the Aerojet contaminated groundwater plume), airspace hazards associated with Mather Airport flight paths due to tall structures, and interference with an adopted emergency evacuation plan.</p>	<p>Shifting The placement of approximately 181.5 acres of solar development under Alternative 2 from Scott Road to the southwest 480-acre parcel would result in a greater the same amount of solar facilities development, and would result in a greater similar level of impact from potential hazards from routine transport, use, or disposal of hazardous materials or reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, development on a Cortese-listed site (i.e., the Aerojet contaminated groundwater plume), airspace hazards associated with Mather Airport flight paths due to tall structures, and interference with an adopted emergency evacuation plan.</p>
Hydrology and Water Quality	<p>Because the proposed project would not be implemented and ranching operations would</p>	<p>Because an increased the same amount of construction would occur and the same amount and</p>	<p>Because Alternative 2 would result in a 500-foot buffer zone along Scott Road where solar facilities</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
	continue, there would be no potential for project-related construction and operational violation of water quality standards or substantial degradation of surface or groundwater quality, substantial increases in the rate and amount of stormwater runoff resulting in erosion and water quality violations and flooding, or conflicts with water quality and groundwater sustainability plans. Thus, the level of all hydrology and water quality impacts would be reduced .	types of solar facilities would be installed, Alternative 1 would result in a greater similar level of impact from project-related construction and operational violation of water quality standards or substantial degradation of surface or groundwater quality, substantial increases in the rate and amount of stormwater runoff resulting in erosion and water quality violations and flooding, or conflicts with water quality and groundwater sustainability plans.	would not be developed, construction and operational activities would also be set back further from Carson Creek (which is the largest drainage feature), and Little Deer Creek. As shown in Plate ALT-2, the approximately 181.5 acres of solar facilities that would be developed on the southwest 480-acre parcel would be situated at least 1,000 feet, and primarily at least 2,000 feet or more, from the Carson Creek drainage through the southwest parcel. Thus, Alternative 2 would result in a reduced potential for sediment and other pollutants to be washed into these creeks during project construction and operation, thereby reducing the level of impact from potential violation of water quality standards. Because a greater the same overall amount of construction and operation would occur, Alternative 2 would result in a greater similar level of impact from substantial degradation of groundwater quality, substantial increases in the rate and amount of stormwater runoff resulting in erosion and water quality violations and flooding, or conflicts with water quality and groundwater sustainability plans.
Land Use and Planning	Because the proposed solar facilities project would not be implemented and the existing land use for rangeland would continue, there would be no potential for conflicts with land use designations and zoning, policies, plans, or other regulations that were adopted to avoid environmental impacts. Therefore, the level of impact would be reduced.	<p>The project site and the southwest 480-acre parcel are zoned AG-80 and designated for agricultural use. Most institutional uses, including large commercial solar facilities, are allowed within areas zoned AG-80 if a conditional use permit is approved by the County Board of Supervisors. As with the proposed project, Alternative 1 would include a request for approval of the necessary conditional use permit, and if approved, Alternative 1 would be consistent with the existing zoning. Therefore, a similar level of impact related to consistency with land use designations and zoning would occur under Alternative 1.</p> <p>Because there are no existing residences within the added 480-acre parcel, Alternative 1 would not result in a physical division of an established community and therefore a similar level of impact would occur as compared to the proposed project.</p> <p>Similar to the proposed project, uUnder Alternative 1, landscaping would be implemented along Scott Road. Although the landscaping would provide a softening effect in terms of the visual impacts from Scott Road, it would not provide complete screening. Furthermore, screening would not be provided (and</p>	<p>The project site and the added 480-acre parcel are zoned AG-80 and designated for agricultural use. Most institutional uses, including large commercial solar facilities, are allowed within areas zoned AG-80 if a conditional use permit is approved by the County Board of Supervisors. As with the proposed project, Alternative 2 would include a request for approval of the necessary conditional use permit, and if approved, Alternative 2 would be consistent with the existing zoning. Therefore, a similar level of impact related to consistency with land use designations and zoning would occur under Alternative 2.</p> <p>Because there are no existing residences within the added 480-acre parcel, Alternative 2 would not result in a physical division of an established community, and therefore a similar level of impact would occur as compared to the proposed project.</p> <p>Because Alternative 2 would implement a 500-foot buffer zone on both sides of Scott Road through the project site where no solar panels would be installed, solar panels would still be visible, but they would only be situated within the viewer's middleground rather than also in the foreground. Therefore, the</p>

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		would not be effective) from the Scenic Overlook or the trails at the Prairie City SVRA. Therefore, as with the proposed project, Alternative 1 would result in a similar level of impact from inconsistency with General Plan Policies PF-78 and CI-58, which were adopted to provide protection for visual resources in areas of high scenic value and along Scott Road.	level of impact from conflicts with General Plan Policies PF-78 and CI-58 would be reduced along Scott Road. Because Alternative 2 would still result in a greater the same number of solar panels and a substation in the same locations within the viewshed from the Prairie City SVRA, the level of impact from conflicts with General Plan Policies PF-78 and CI-58 for recreationists within the SVRA would be greater similar .
Noise and Vibration	Because the proposed project would not be implemented, there would be no potential for short-term construction source noise levels to exceed the applicable County standards at nearby noise-sensitive receptors; and no potential to expose sensitive receptors to groundborne noise and vibration levels that would exceed applicable standards resulting in potential human disturbance and damage to structures during blasting activities. Therefore, the level of impacts related to construction noise and vibration would be reduced .	Shifting the proposed solar facilities away from the trees to be preserved under Alternative 1 would not reduce the noise or vibration levels for the sensitive receptor at 3850 Scott Road. Furthermore, shifting this solar development acreage under Alternative 1 to the southwest 480-acre parcel could subject two rural residences on Pleasant Hill Lane to construction-related noise and vibration (at a distance of approximately 1,000 feet at the closest point) that could exceed the applicable standards – particularly if blasting is required. Therefore, Alternative 1 could result in new noise and vibration impacts to two different sensitive receptors that would not otherwise be affected under the proposed project, resulting in an increased level of impact, <u>though not likely to a significant level.</u>	Because Alternative 2 would result in a 500-foot buffer zone along both sides of Scott Road where solar facilities would not be installed, the potential noise and vibration impacts at the existing sensitive receptor at 3850 Scott Road would be reduced as compared to the proposed project. However, shifting the 181.5 acres of solar facilities under Alternative 2 from Scott Road to the southwest 480-acre parcel could subject two additional rural residences on Pleasant Hill Lane to construction-related noise and vibration (at a distance of approximately 1,000 feet at the closest point) that could exceed the applicable standards – particularly if blasting is required. Therefore, Alternative 2 could result in new noise and vibration impacts to two different sensitive receptors that would not otherwise be affected under the proposed project, resulting in an increased level of impact, <u>though not likely to a significant level.</u>
Public Services (Fire Protection)	Because the proposed project would not be implemented and ranching operations would continue, there would be no potential for increased need for fire protection services or facilities. Therefore, the level of impact related to fire protection would be reduced .	Because a greater the same amount of construction would occur in the same general area with the same vegetation types, and the same amount and types of solar facilities would be installed, Alternative 1 would result in a greater similar level of impact related to fire protection services and facilities.	Because a greater the same amount of construction would occur in the same general area with the same vegetation types, and the same amount and types of solar facilities would be installed, Alternative 2 would result in a greater similar level of impact related to fire protection services and facilities.
Traffic and Circulation	Because the proposed project would not be implemented and ranching operations would continue, there would be a continued very minor level of vehicular traffic related to ongoing activities within the proposed project site. Therefore, the level of impact related to transportation would be reduced .	Because a greater the same amount of construction and decommissioning would occur under Alternative 1 in essentially the same location, this alternative would have a greater similar level of impact related to transportation. As under the proposed project, u Under Alternative 1, access to the project site would be provided via U.S. Highway 50 and local access to the Alternative 1 site would be from Prairie City Road and Scott Road. Alternative 1 would not	Because a greater the same amount of construction and decommissioning would occur under Alternative 1 in essentially the same location, this alternative would have a greater similar level of impact related to transportation. As under the proposed project, u Under Alternative 2, access to the project site would be provided via U.S. Highway 50 and local access to the Alternative 2 site would be from Prairie City Road and Scott Road. Alternative 2 would not

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
		include any permanent changes to the public roadway network. During operations, as under the proposed project , there would be a very low number of maintenance and inspection trips to the Alternative 1 site. As with the proposed project , Alternative 1 would require implementation of a construction traffic control plan.	include any permanent changes to the public roadway network. During operations, as under the proposed project , there would be a very low number of maintenance and inspection trips to the Alternative 2 site. As with the proposed project , Alternative 2 would require implementation of a construction traffic control plan.
Tribal Cultural Resources	Because the proposed solar development would not occur and the site would continue to be used for rangeland, there would no potential for construction or operational activities associated with new urban development to adversely affect Tribal Cultural Resources, and therefore the level of impact would be reduced .	<p>Tribal Cultural Resources, for the purposes of this EIR, are known to occur within the project site. Native oak species are major contributors to local indigenous history and lifeways. Alternative 1 would result in <u>the same</u> preservation of approximately 1,200 trees in three large stands of oak woodlands. Furthermore, these stands of oak woodlands are contiguous with other oak woodlands outside of the project site boundaries. The area where solar facilities would be shifted <u>added</u> within the 480-acre southwest parcel does not include oak woodlands and would not result in the loss of trees. Therefore, the level of impact to Tribal Cultural Resources in terms of preservation of oak trees, including heritage trees, would be <u>reduced (but would remain Significant and Unavoidable, similar to the proposed project)</u>.</p> <p>However, under Alternative 1, <u>a greater</u> the same amount of land in the same general area, which has been identified as part of the Tosewin Tribal Cultural Resource, would still be used for development of solar facilities. Therefore Alternative 1, as with the proposed project, would result in substantial new infrastructure and visual impacts that would substantially alter the historical setting and feeling of contributing elements of the California Register of Historical Resources-eligible Tosewin Tribal Cultural Resource. Therefore, the level of impact would be <u>greater similar</u>.</p>	<p>Tribal Cultural Resources, for the purposes of this EIR, are known to occur within the project site. Tribal consultation has identified that Scott Road follows the route of another precontact foot path that was used by Native American peoples to trek to and from the Cosumnes River to White Rock. Heritage trees and stands of oak woodlands at the project site and in the project area are an important part of the known Tribal Cultural Resources. Alternative 2 would result in the preservation of additional individual oak trees within a 500-foot buffer zone along both sides of Scott Road through the project site, particularly in the northeastern portion of the project site. Alternative 2 would also result in the preservation of foreground views from Scott Road, and would therefore limit the visual impacts along Scott Road to middleground views. Therefore, the level of impact to Tribal Cultural Resources in terms of preservation of oak trees and the viewshed along Scott Road would be <u>reduced (but would remain Significant and Unavoidable, similar to the proposed project)</u>.</p> <p>However, under Alternative 2, <u>a greater</u> the same amount of land in the same general area, which has been identified as part of the Tosewin Tribal Cultural Resource, would still be used for development of solar facilities. Therefore Alternative 2, as with the proposed project, would result in substantial new infrastructure and visual impacts that would substantially alter the historical setting and feeling of contributing elements of the California Register of Historical Resources-eligible Tosewin Tribal Cultural Resource. Therefore, the level of impact would be <u>greater similar</u>.</p>
Utilities and Service Systems (Water Supply)	Because the proposed project would not be implemented and ranching operations would continue, there would be no increased demand for water supply. Therefore, the level of impact related to whether sufficient groundwater or surface water	Because <u>a greater</u> the same amount of construction and decommissioning would occur in the same general area, and the same amount and types of solar facilities would be installed, Alternative 1 would result in <u>a greater</u> same demand for increased water	Because <u>a greater</u> the same amount of construction and decommissioning would occur in the same general area, and the same amount and types of solar facilities would be installed, Alternative 2 would result in <u>a greater</u> same demand for increased water

Environmental Topic Area	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
	supplies would be available would be reduced .	supply as compared to the proposed project. Therefore, the level of impact related to whether sufficient water supplies would be available to serve Alternative 1 and reasonably foreseeable future development during normal, dry, and multiple dry years would be greater similar .	supply as compared to the proposed project. Therefore, the level of impact related to whether sufficient water supplies would be available to serve Alternative 2 and reasonably foreseeable future development during normal, dry, and multiple dry years would be greater similar .
Wildfire	Because the proposed project would not be implemented and ranching operations would continue, there would be no increased potential to exacerbate wildfire risk in a State-designated High Fire Hazard Severity Zone (FHSZ), and therefore the level of impact would be reduced .	The southeast corner of the project site is designated by CAL FIRE as a High FHSZ. The 480-acre southwest parcel is designated as a Moderate FHSZ. A greater The same overall amount of solar facilities would be developed under Alternative 1 as compared to the proposed project. However, because Alternative 1 would add transfer a small area of the proposed solar facilities from a portion of the High FHSZ (approximately 16 acres) to an area that is also Moderate FHSZ within the 480-acre southwest parcel, the level of impact from the potential to exacerbate wildfire risk would be similar reduced . Because the solar facilities would be installed in an area with the same risk level and using the same roadways under Alternative 1, a similar level of impact would result from potential interference with emergency evacuation plans.	The southeast corner of the project site is designated by CAL FIRE as a High FHSZ. The 480-acre southwest parcel is designated as a Moderate FHSZ. A greater The same overall amount of solar facilities would be developed under Alternative 2 as compared to the proposed project. However, because Alternative 2 would reduce transfer some of the proposed solar facilities from a High FHSZ along Scott Road and add to a Moderate FHSZ within the 480-acre southwest parcel, the level of impact from the potential to exacerbate wildfire risk would be reduced . Because the solar facilities would be installed in an area with the same risk level and using the same roadways under Alternative 2, a similar level of impact would result from potential interference with emergency evacuation plans.

Notes:

AG-80 = agricultural properties of 80 acres or more
 AMMs = avoidance and minimization measures
 CAL FIRE = California Department of Forestry and Fire Protection
 FHSZ = Fire Hazard Severity Zone
 GHGs = greenhouse gases
 HCP = Habitat Conservation Plan
 NHD = National Hydrography Dataset
 NWI = National Wetlands Inventory
 SMUD = Sacramento Municipal Utility District
 SSHCP = South Sacramento Habitat Conservation Plan
 SVRA = State Vehicular Recreation Area
 UDA = Urban Development Area
 USB = Urban Services Boundary

COMPARATIVE COMPARISON OF ENVIRONMENTAL EFFECTS

For comparison purposes, Table ALT-2 provides the impacts of the ~~proposed project~~ **Reduced Footprint Project** before mitigation, the No Project alternative, Alternative 1 (Biological Resources Preservation Alternative), and Alternative 2 (Scott Road Buffer Alternative).

- NI: indicates the project's impact is no impact
- LS: Indicates the project's impact is less than significant
- PS: Indicates the project's impact is potentially significant
- S: Indicates the project's impact is significant
- Less: Indicates the impact is less than the ~~proposed project~~ **Reduced Footprint Project**
- Similar: Indicates the impact is equal or similar to the ~~proposed~~ **Reduced Footprint Project** project
- Greater: Indicates the impact is greater than the ~~proposed~~ **Reduced Footprint Project** project

As noted above, the Reduced Footprint Project is now the proposed project to be considered by the County.

Table ALT-2: Comparison of Alternatives to the ~~Proposed~~ **Reduced Footprint Project**

Impact Category	Proposed <u>Reduced Footprint Project</u> Before Mitigation	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Aesthetics				
Impact AE-1: Have a Substantial Adverse Effect on a Scenic Vista	S	Less	Similar	Similar
Impact AE-2: Substantially Damage Scenic Resources within a State- or County- Designated Scenic Highway	S	Less	Similar	Less
Impact AE-3: Substantially Degrade the Existing Visual Character or Quality of the Project Site	S	Less	Similar <u>Greater</u>	Less <u>Greater</u>
Impact AE-4: Create Substantial New Sources of Light and Glare	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Agricultural Resources and Land Use				
Impact AL-1: Conversion of Agricultural Land to Non-Agricultural Use	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>

Impact Category	Proposed Reduced Footprint Project Before Mitigation	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Air Quality				
Impact AQ-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plan	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact AQ-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	PS	Less	Greater	Greater
Impact AQ-4: Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People	LS	Less	Greater	Greater
Biological Resources				
Impact BR-1: Have a Substantial Adverse Effect, Either Directly or Through Habitat Modifications, on Any Species Identified as a Candidate, Sensitive, or Special-Status Species in Local or Regional Plans, Policies, or Regulations, or by CDFW or USFWS	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact BR-2: Have a Substantial Adverse Effect on Any Riparian Habitat or Other Sensitive Natural Community Identified in Local or Regional Plans, Policies, or Regulations, or by CDFW or USFWS	PS	Less	Less <u>Greater</u>	Less
Impact BR-3: Have a Substantial Adverse Effect on State or Federally Protected Wetlands (including, but not Limited to, Marsh, Vernal Pool, Coastal) through Direct Removal, Filling, Hydrological Interruption, or Other Means	PS	Less	Similar	Less
Impact BR-4: 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	PS	Less	Similar	Similar
Impact BR-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources, such as a Tree Preservation Policy or Ordinance	PS	Less	Similar	Similar

Impact Category	Proposed Reduced Footprint Project Before Mitigation	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Impact BR-6: Conflict with the Provisions of an Adopted HCP, Natural Community Conservation Plan, or other approved Local, Regional, or State HCP	LS	Less	Similar	Similar
Climate Change				
Impact CC-1: Generate Greenhouse Gas Emissions, Either Directly or Indirectly, that May have a Significant Impact on the Environment	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact CC-2: Conflict with an Applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases	LS	Greater	Similar <u>Greater</u>	Similar <u>Greater</u>
Cultural and Paleontological Resources				
Impact CR-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource Pursuant to Section 15064.5	NI	Similar	Similar	Similar
Impact CR-2: Cause a Substantial Adverse Change in The Significance of an Archaeological Resource Pursuant to Section 15064.5	PS	Less	Similar	Similar
Impact CR-3: Disturb Any Human Remains, Including Those Interred Outside of Dedicated Cemeteries	PS	Less	Similar	Similar
Impact CR-4: Damage to or Destruction of Unique Paleontological Resources During Earthmoving Activities	PS	Less	Greater	Greater

Impact Category	Proposed Reduced Footprint Project Before Mitigation	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Hazards and Hazardous Materials				
Impact HAZ-1: Routine Transport, Use, or Disposal of Hazardous Materials or Reasonably Foreseeable Upset and/or Accident Conditions Involving the Release of Hazardous Materials	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact HAZ-2: Hazards from Development on a Site Listed in California Government Code Section 65962.5 (Cortese List)	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact HAZ-3: Airport Safety Hazards	LS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact HAZ-4: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	LS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Hydrology and Water Quality				
Impact HYD-1: Violate Water Quality Standards or Substantially Degrade Surface or Groundwater Quality	LS	Less	Similar <u>Greater</u>	Less
Impact HYD-2: Impede Sustainable Groundwater Management of the Basin by Substantially Decreasing Groundwater Supplies or Interfering with Groundwater Recharge	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact HYD-3: Substantially Alter Drainage Patterns or Add Impervious Surfaces That Would Exceed Storm Drainage Systems, Substantially Degrade Water Quality, Result in Increased Flooding, or Impede or Redirect Flood Flows	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Impact HYD-4: Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan	PS	Less	Similar <u>Greater</u>	Similar <u>Greater</u>
Noise				
Impact NOI-1. Temporary, Short-Term Exposure of Sensitive Receptors to Construction Noise	PS	Less	Greater	Greater
Impact NOI-2. Temporary, Short-Term Exposure of Sensitive Receptors to Potential Groundborne Noise and Vibration from Project Construction	PS	Less	Greater	Greater

Impact Category	Proposed Reduced Footprint Project Before Mitigation	No Project Alternative	Alternative 1: Biological Resources Alternative	Alternative 2: Scott Road Buffer Alternative
Impact NOI-3: Permanent Exposure of Off-Site Noise-Sensitive Receptors to Generation of Non-Transportation Noise Levels in Excess of Local Standards	PS	Less	Similar	Similar
Traffic and Circulation				
Impact TC-1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities	LS	Less	Similar	Similar
Impact TC-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (B)	LS	Less	Similar	Similar
Impact TC-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g. Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)	PS	Less	Similar Greater	Similar Greater
Impact TC-4: Result in Inadequate Emergency Access	LS	Less	Similar	Similar
Tribal Cultural Resources				
Impact TCR-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	S	Less	Similar Greater	Similar Greater
Wildfire				
Impact WF-1: Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan	LS	Less	Similar	Similar
Impact WF-2: Exacerbate Wildfire Risk	PS	Less	Similar	Similar Less

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines require evaluation of a No Project alternative. When the No Project alternative is the environmentally superior alternative, another environmentally superior alternative among the other alternatives must also be identified (CEQA Guidelines Section 15126.6[e][2]).

As described above, the CEQA Guidelines provide that the discussion of alternatives in an EIR should focus on alternatives to the project “which are capable of avoiding or substantially lessening any significant effects of the project” (CEQA Guidelines Section 15126.6[b]). Alternative 1 has been developed with a focus on reducing potentially

significant effects of the ~~proposed project~~ related to biological resources impacts – particularly the loss of oak woodlands. Alternative 2 has been developed with a focus on reducing significant effects of the **Reduced Footprint Project** ~~proposed project~~ related to aesthetics impacts – particularly in areas within 500 feet of Scott Road.

Table ALT-2 provides a summary comparison of the impacts of the **Reduced Footprint Project** ~~proposed project~~ and the alternatives. As indicated in Table ALT-2, the No Project alternative would reduce impacts to all resource areas listed above, except for Climate Change Impact CC-2 and Cultural Resources Impact CR-1. The No Project alternative would not meet any of the project objectives listed in Chapter 2 and in the Considerations for Selection of Alternatives Section, above. The No Project alternative would not result in the energy and GHG emissions benefits achieved under the **Reduced Footprint Project** ~~proposed project~~, Alternative 1, or Alternative 2. For example, once operational, the **Reduced Footprint Project** ~~proposed project~~, Alternative 1, and Alternative 2 would increase the region's renewable power resources and overall generation capacity, resulting in a net increase in energy resources. Consistent with the goals included in Appendix F of the CEQA Guidelines, the **Reduced Footprint Project** ~~proposed project~~, Alternative 1, and Alternative 2 would contribute to the overall goal of decreasing reliance on fossil fuels and increasing reliance on renewable energy sources. Similarly, the No Project alternative would not result in a GHG emissions benefit. Implementation of the **Reduced Footprint Project** ~~proposed project~~, Alternative 1, and Alternative 2 would create a GHG-free energy resource and increase SMUD's renewable energy supply and help reduce GHG emissions associated with SMUD's power generation. The development of renewable energy sources, such as the **Reduced Footprint Project** ~~proposed project~~, Alternative 1, and Alternative 2, are a necessity to meet the State Renewables Portfolio Standard requirements, realizing a 100-percent renewable energy power mix, and achieving overall state GHG emissions reduction targets.

The **Reduced Footprint Project** ~~proposed project~~, Alternative 1, and Alternative 2 would build a 200 MW solar photovoltaic energy-generating facility. As identified above in Table ALT-2, **the No Project Alternative would reduce one impact and increase 37 impact areas compared to the Reduced Footprint Project. Alternative 1 would reduce no impacts and would increase 24 impact areas compared to the Reduced Footprint Project.** Alternative 2 would result in reduced impacts to Aesthetics (Impact AE-2 and Impact AE-3), Biological Resources (Impact BR-2 and Impact BR-3), and Hydrology and Water Quality (Impact HYD-1) when compared to the **Reduced Footprint Project** ~~proposed project~~. However, as indicated in Table ALT-2, Alternative 2 would result in increased impacts to Air Quality (Impact AQ-3 and Impact AQ-4), Cultural and Paleontological Resources (Impact CR-4), and Noise (Impact NOI-1 and Impact NOI-2), **along with 17 other impacts,** when compared to the **Reduced Footprint Project** ~~proposed project~~. Therefore, Alternative 2 would overall have **greater** similar environmental impacts compared to the **Reduced Footprint Project** ~~proposed project~~, and for this EIR, the County considers both the proposed project and Alternative 2 to be environmentally superior to Alternative 1. Therefore, **Although the Reduced Footprint Project would have fewer impacts, of the alternatives presented, the No Project Alternative is environmentally superior, and other than the No Project Alternative,**

Alternative 2 is environmentally superior~~two environmentally superior alternatives~~
(other than the No Project Alternative) have been identified.

~~The proposed project, Alternative 1, and Alternative 2 would meet all of the project objectives defined for the project. The proposed project and Alternative 2 would be environmentally superior to Alternative 1 because of the reduced impacts in the environmental topics listed above, particularly the reduced impacts on Aesthetics and Biological Resources, while still meeting all of the project objectives.~~

~~For these reasons, the proposed project and Alternative 2 would both be considered environmentally superior alternatives — these alternatives would result in the fewest impacts while still meeting all of the project objectives.~~