5.0 ALTERNATIVES

In accordance with CEQA and the CEQA Guidelines (Section 15126.6), an EIR must describe a range of reasonable alternatives to the project, or to the location of the project, that would "feasibly attain most of the project's basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project." An EIR need not consider every conceivable alternative to a project; rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice, even if those alternatives "impede to some degree the attainment of the project objectives, or would be more costly." Specifically, the CEQA Guidelines set forth the following criteria for selecting alternatives:

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (Section 15126.6[b]);

- The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. (Section 15126.6[c]);

- The specific alternative of "no project" shall also be evaluated along with its impact. (Section 15126.6[e][1]); and

- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. (Section 15126.6[f]).

5.1 CHARACTERIZATION OF PROPOSED PROJECT

The proposed Project, described fully in Chapter 3.0, involves the implementation of an update to the CCAP, a rivershed management plan adopted in 1996, that consists of two distinct complementary plans governing different areas of the overall plan area, namely the Cache Creek Resources Management Plan (CCRMP) and the Off-Channel Mining Plan (OCMP). The CCAP Update also includes revisions to the implementing ordinances to update the regulatory framework. Key proposed changes by document are summarized below:

<u>CCRMP</u>

- Extend horizon year to 2068 to allow for a full 50 years and to be consistent with the HCP/NCCP (p. 14)
- Clarify allowable in-channel project categories (p. 17)
- Clarify role related to flood protection (e.g., p. 25-26)
- Summarize 2017 Tech Studies analysis of aggradation (p. 33)

- Identify new channel form template to replace Test 3 (p. 35)
- Increase in-channel material removal limit from 210,000 tons to 690,800 tons (2.4-2, p. 38)
- Simplify description of required hydraulic modeling (2.4-4, p.39)
- Move Performance Standards into CCIP and/or In-Channel Ordinance (e.g. p. 44)
- Modify required water quality testing (3.4-3, p. 51)
- Recognize climate change (4.2-6, p. 64)
- Clarify coordination requirements for restoration (4.4-10, p. 66 and 4.4-11, p. 67)
- Modify in-channel boundary and CCRMP boundary based on channel changes (new figures 1 and 2 in the updated CCRMP)

CCIP

- Clarify work flow for annual monitoring and reporting (p. 18, 19)
- Clarify a significant event threshold of 20,000cfs (e.g., p. 19, 29, 43, etc)
- Eliminate references to “major channel stabilization projects” which were to occur in first 5 years (p. 20)
- Identify new channel form template to replace Test 3 (p. 23-25)
- Eliminate references to specific design templates in favor of references to industry standards and best practices (Chapter 5, e.g., p. 37)
- Increase in-channel material removal limit from 210,000 tons to 690,800 tons (p. 39)
- Integrate program protocols developed since 1996 (e.g.,changes aerial surveying to every 5 years p. 49)
- Clarify role related to flood protection (e.g., p. 52)

OCMP

- Identify 1,188 acres for rezoning for future aggregate mining (p. 14 and new Figure 5 in the OCMP update)
- Extend horizon year to 2068 to allow for a full 50 years and to be consistent with the HCP/NCCP (p. 16)
- Eliminate optional 15-year interim review (p. 31)
- Clarify roadway mitigation and maintenance obligations (2.3-8, p. 32 and 2.4-21, p. 36)
- Expand “net gain” concept to include contributions to the parkway (2.4-7, p. 34)
- Summarize 2017 Tech Studies analysis of aggradation (p. 41)
- Identify new channel form template to replace Test 3 (p. 43)
- Change farmland mitigation requirement (p. 47)
- Recognize climate change (6.2-3, p. 55)
- Clarify coordination requirements for restoration (6.4-1, 6.4-7, p. 56-57)

In-Channel Ordinance (In-Channel Maintenance Mining Ordinance, Yolo County Code, Title 10, Chapter 3)

- Change name and modify text to eliminate references to “mining” or “excavation” (p. 1 and throughout)
- Change term “maintenance mining” to “material removal” (10-3.207, p. 2)
- Modify some of the restrictions to allow site specific technical analysis to determine appropriate thresholds (e.g. 10-3.409, 10-3.407e, p. 5-6)
- Integrate County violation procedures and clarifies that costs incurred are billable to the operator (Article 10, p. 21)

Reclamation Ordinance (Surface Mining Reclamation Ordinance, Yolo County Code Title 10, Chapter 5)

- Integrate mercury protocol clarifications (10-5.517, p. 11)
- Clarify that consistency with the Parkway Plan will be required (10-5.520.1, p. 13)
- Integrate requirements for permanent easement to preserve reclamation end uses (10-5.520.2, p. 14)
- Change to farmland mitigation requirement (10-5.525, p. 14)
- Clarify requirement for base level of soil on reclaimed land (10-5.532, p. 16)
- Clarify that inspection fees are to be based on costs for each operation and the responsibility of each operation (10-5.1002, p. 32)
- Integrate County violation procedures and clarify that costs incurred are billable to the operator (Article 12, p. 34)

Mining Ordinance (Off-Channel Surface Mining Ordinance, Yolo County Code Title 10, Chapter 4)

- Clarify roadway mitigation and maintenance obligations (10-4.408 and 10-4.409, p. 8)
- Codify policy related to mining depth (10-4.411.1, p. 9)
- Add requirement for 50 feet setback around a pit for access (10-4.429, p. 17)
- Clarify the link between allowed reductions in the 700-foot setback from the creek and implementation of the channel form template (10-4.429e7, p. 18)
- Clarify that slope requirement does not apply to active mining slopes (10-4.431, p. 19)
- Integrate County violation procedures and clarify that costs incurred are billable to the operator (Article 11, e.g.,p. 34)

Fee Ordinance (Gravel Mining Fee Ordinance, Yolo County Code, Title 10, Chapter 11)

- Clarify that the OCMP fee applies to inspection fees required equally of all mines, but where an individual mine incurs greater cost that a base minimum applicable to all, that operator is solely responsible for those costs (10-11.02c4, p. 3)
- Clarify that the minimum $50,000 annual fee payment is per permitted operation (10-11.08, p. 6)

Flood Protection Ordinance

- Clarify circumstances in which issuance of a FHDP would be appropriate (p.1)

Implementation of the CCAP Update would support the adaptive management focus of this regulatory program by incorporating various programmatic changes that allow for the continued comprehensive regulation and mitigation of the effects of current and future in-channel and off-channel activities, and extend the horizon year for the plan out 50 years.

5.2 PROJECT OBJECTIVES AND IMPACTS

This section identifies the project objectives and restates the project's significant impact statements.

1. Project Objectives

Project objectives are identified in Chapter 3.0, Project Description. To assist in evaluating project alternatives, the CCAP Update objectives are repeated below.

- Conduct a ten-year review and update required by the adopted program, and necessary to

satisfy the adaptive management requirements.

- Document and evaluate the changes in creek conditions that have occurred over the prior ten years.

- Conduct an analysis of collected data from monitoring programs, habitat restoration, channel stabilization, and reclamation efforts over the prior ten years and use the data analysis as a basis to improve the program.

- Acknowledge and accommodate new regulatory requirements that have been developed over the prior ten years and account for these changes in the CCAP program.

2. Approach

The purpose of this discussion of alternatives to the Project is to enable County decision-makers to consider how alternatives to the Project as proposed might reduce or avoid the Project's impacts on the physical environment.

The potential environmental effects of implementing the proposed Project are analyzed in the topical sections in Chapter 4.0, Setting, Impacts, and Mitigation Measures. The proposed Project has been described in Chapter 3.0 and analyzed in the previous sections with an emphasis on determining and evaluating potential significant impacts resulting from the Project and identifying mitigation measures to avoid or reduce these impacts to a less-than-significant level.

This EIR supports the conclusions that the following potential effects of CCAP Update implementation would be less-than-significant without mitigation measures or have no impact for the following topics: aesthetics; hazards and hazardous materials; land use; population and housing; public services; recreation; and utilities and service systems. This EIR also substantiates that the following potential effects of CCAP Update implementation would be less-than-significant with mitigation measures for the following topics: biological resources; cultural and tribal cultural resources; geology, soils, mineral and paleontological resources; and hydrology and water quality. Each of these topics is addressed in the topical sections of the EIR or in Chapter 2.0, Section 2.4 Summary of Effects Found Not to Be Significant. The analysis of alternatives below includes a section examining whether the alternative would result in new potentially significant impacts in these areas where the project was demonstrated to have no or less-than-significant impacts.

The analysis of alternatives emphasizes the avoidance or reduction to a less-than-significant level the significant and unavoidable impacts identified to result from implementation of the project, as all other significant impacts can be reduced to a less-than-significant level with the recommended mitigation measures identified in this EIR. To assist in the evaluation of alternatives, the significant and unavoidable impact statements associated with the topics of agricultural, air quality, greenhouse gas emissions (GHG), noise, and transportation are restated below.

- Impact AG-1: The CCAP Update (specifically the OCMP portion of CCAP) would have the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use. (SU)

- Impact CUMULATIVE AG-1: Implementation of the OCMP in conjunction with other planned development in the region would contribute cumulatively to loss of farmland impacts. (SU)

- Impact AIR-1: The CCAP Update would conflict with or obstruct implementation of the applicable air quality plan. (SU)

- Impact AIR-2: Under the CCAP Update, the CCAP Program would continue to result in violation of air quality standards and contribute to a cumulatively considerable net increase in an existing or projected air quality violation. (SU)

- Impact CUMULATIVE AIR-1: Implementation of the Plan in conjunction with other planned development in the region would contribute cumulatively to air quality impacts. (SU)

- Impact GHG-1: The CCAP Update would generate GHG emissions that may have a significant impact on the environment. (SU)

- Impact CUMULATIVE NOI-1: Implementation of the OCMP and associated increase in truck trips in conjunction with increased traffic under General Plan build-out would contribute cumulatively to roadway noise impacts. (SU)

- Impact CUMULATIVE TR-1: Implementation of the OCMP and associated increase in truck trips in conjunction with increased traffic under General Plan build-out would contribute cumulatively to transportation impacts. (SU)

5.3 SELECTION AND ANALYSIS OF ALTERNATIVES

This subsection describes two alternatives selected for more detailed comparative analysis in this EIR, including the No Project Alternative. These alternatives were selected based on an initial consideration of feasibility, compliance with project goals and objectives, and avoidance of environmental effects. The two alternatives to the proposed Project that are discussed in this chapter are the following:

- Alternative 1, **No Project Alternative.** This alternative assumes the County would not make or adopt any of the changes to the CCRMP, CCIP, OCMP and implementing ordinances identified under the proposed CCAP Update. All existing plans, policies, and regulations would remain in place with no revisions.

- Alternative 2, **Constrained Implementation Alternative.** This alternative assumes 50 percent less material would be removed from the Cache Creek channel under the CCRMP/CCIP relative to the proposed CCAP Update and that the amount of potential new off-channel mining under the OCMP would be 50 percent of the acreage identified under the proposed CCAP Update.

These alternatives represent a reasonable range of potential alternatives to the proposed CCAP Update in light of the objective of reducing or avoiding environmental impacts identified in this EIR. Other alternatives that were considered but rejected because they were infeasible on their face and/or did not satisfy most of the basic project objectives are described at the end of this chapter.

5.4 ALTERNATIVES ANALYSIS

This section identifies and discusses the No Project Alternative and another feasible alternative to the proposed Project, compares the impacts of each alternative to the impacts of the Project with an emphasis on identified significant and unavoidable impacts, and determines whether the alternatives meet the basic project objectives, avoid or reduce project-related significant impacts, or would create new significant impacts.

1. No Project Alternative

a. Principal Characteristics

Under the No Project Alternative**,** the County would not adopt any of the proposed clarifications, modifications, or changes to the CCRMP, CCIP, OCMP, or implementing ordinances identified as part of the Project. All existing plans, policies, and regulations would remain in place as previously adopted with none of the modifications identified as part of the CCAP Update. For in-channel restoration and stabilization projects, the 1995 Test 3 Run Boundary would continue to be implemented, there would be no change to the CCRMP boundary, and there would be no increase in the amount of in-channel material that can be removed for purposes of channel maintenance and restoration over and above what is identified under the program currently. Under the No Project Alternative there would be no designation of potential new future mining areas (SGRO) and no modification of the planning horizon year.

b. Consistency with Project Objectives

The No Project Alternative does not meet any of the following Project objectives:

- Conduct a ten-year review and update required by the adopted program, and necessary to satisfy the adaptive management requirements.

- Document and evaluate the changes in creek conditions that have occurred over the prior ten years.

- Conduct an analysis of collected data from monitoring programs, habitat restoration, channel stabilization, and reclamation efforts over the prior ten years and use the data analysis as a basis to improve the program.

- Acknowledge and accommodate new regulatory requirements that have been developed over the prior ten years and account for these changes in the CCAP program.

This alternative fails to allow for data collection and monitoring that has been conducted over the last 20 years to inform adaptive management programs for in-channel and off-channel projects and activities via an ongoing update to those programs instituted to protect environmental resources.

c. Analysis of No Project Alternative

Under the No Project Alternative, existing and future in-channel restoration activities and off-channel mining and processing operations would continue to operate within the CCAP area as allowed under the existing plans and ordinances. Under this alternative, none of the key changes listed above in subsection 5.1 would be implemented.

Agriculture and Forestry Resources

The CCAP includes 1,001 acres of land designated with the SGRO for future mining. The CCAP Update would add the SGRO to an additional 1,188 acres of land. Because there would be less land identified for future off-channel mining under this alternative, this impact would be reduced as compared to the Project but not eliminated. Moreover, the proposed revisions to the plans and regulatory ordinances identified in the CCAP Update, including the amendments to the OCMP and Reclamation Ordinance regarding the types of farmland protected (e.g., Sec. 10-5.525 which would expand the types of farmland protected relative to the existing CCAP program), aimed at protecting agriculture resources would not be implemented, and the significant and cumulative significant unavoidable impacts to agricultural resources would remain under this alternative.

Overall, this significant and unavoidable impact would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. However, the alternative does not include revisions to the regulations to clarify the County requirements and increase the required mitigation for loss of agricultural land. As such this impact is likely to be similar on balance between the project and this alternative.

Air Quality

Under the CCAP Update, criteria pollutant emissions (ROG and NOx) would increase relative to existing conditions. Under, the No Project Alternative, which would continue the existing program, emissions of criteria pollutant would be reduced relative the proposed Project but not eliminated. Existing CCAP emissions exceed YSAQMD thresholds and therefore the CCAP's contribution to a significant and unavoidable air quality impact would remain under the No Project Alternative.

Overall, this significant and unavoidable impact would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such this impact is likely to be less severe under this alternative.

Greenhouse Gas Emissions and Energy

Impacts associated with a contribution to greenhouse gas emissions and energy consumption primarily associated with increased truck trips could be less than under the proposed Project. Greenhouse gas emission impacts associated with in-channel and off-channel activities would continue to be generated at similar levels as existing conditions. However, the revisions to the plans and regulatory ordinances identified in the CCAP Update (including the addition of goals to the OCMP and CCRMP to integrate climate-smart adaptation strategies) that could reduce greenhouse gas emissions and energy consumption would not be implemented. As activities under the No Project Alternative would continue and would incrementally contribute to global greenhouse gas emissions, the significant and unavoidable impacts related to an increase in greenhouse gas emissions would remain under this alternative.

Overall, this significant and unavoidable impact would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such this impact is likely to be less severe under this alternative.

Noise and Groundbourne Vibration

The noise and vibration effects of the ongoing activities that would occur under the No Project Alternative would continue to be generated at similar levels as existing conditions. The proposed Project's significant and unavoidable contribution to truck-related roadway noise (related to an increase in truck traffic) would be avoided. Therefore, this alternative would reduce impacts relative to the proposed CCAP Update.

Overall, this significant and unavoidable impact would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such this impact is likely to be less severe under this alternative.

Transportation

Transportation effects of the ongoing activities that would occur under the No Project Alternative would continue to be generated at similar levels as existing conditions and potential

transportation impacts would be less than impacts associated with the proposed Project because the increase vehicular trips associated with the proposed CCAP Update would not occur. However, the revisions to the plans and regulatory ordinances identified in the CCAP Update, including the clarifications required in Mitigation Measure TR-3 to Sec. 10-3.409 of the In-Channel Ordinance regarding Limitations on Removal of Material, would not be implemented. While the significant unavoidable impacts related to transportation would remain under this alternative, it would reduce the severity of these impacts relative to the CCAP Update.

Overall, this significant and unavoidable impact would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such this impact is likely to be less severe under this alternative.

Potential for New Impacts in Topical Areas Determined to be Less-Than-Significant (With and Without Mitigation) for the Project

Because there would be no expansion of in-channel activities or removal of in-channel material beyond that allowed under the CCRMP/CCIP and no expansion of future OCMP mining areas over what the program would currently allow, impacts in most areas found to be less-than-significant (with and without mitigation) for implementation of the project, would be similar or reduced under the No Project Alternative. However, the revisions to the plans and regulatory ordinances identified in the CCAP Update aimed at clarifying and improving CCAP plans, policies, and regulations would not be implemented.

Overall, these less-than-significant impacts would occur under both the project and this alternative. This alternative would likely result in less impact as compared to the project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such any level of impact generally ***is likely to be less severe*** under this alternative.

In the area of hydrology and water quality however, impacts from this alternative are likely to exceed those that would occur under the Project. Implementation of the CCAP under the No Project Alternative would affect some hydrological and water quality resources to approximately the same degree as under the proposed CCAP Update. However, the proposed revisions to Sec. 10-5.517 of the Reclamation Ordinance related to Mercury Bioaccumulation in Fish would reduce hydrology and water quality impacts for the proposed Project and provide additional protections and regulatory control that would not be in place under the No Project Alternative. Additionally, the County would be more constrained under the No Project Alternative as compared to under the Project, in their ability to encourage and support flood control projects because the existing lower limits on the amount of material that can be removed from the channel in any given year would remain unchanged despite the results of in-channel monitoring and the Fluvial Geomorphology Study.

Therefore, implementation of the No Project Alternative would be expected to result in new significant hydrology and water quality impacts that would not be mitigated.

2. Constrained Implementation Alternative

a. Principal Characteristics

The Constrained Implementation Alternative assumes 50 percent less material would be removed from the Cache Creek channel under the CCRMP/CCIP relative to the proposed CCAP Update. and that the amount of potential new off-channel mining under the OCMP would be 50 percent of the acreage identified under the proposed CCAP Update. Other than these

reductions in material to be removed, all other modifications to the CCRMP, CCIP, OCMP and implementing ordinances would apply.

Under the CCAP as currently adopted, up to 210,000 tons per year may be removed in-channel for identified allowable activities. The CCAP Update would increase this number generally to a maximum of 690,800 tons, and occasionally up to 1,381,600 tons in one year depending on conditions. Under the Constrained Implementation Alternative the maximum tonnage that could be removed in-channel would be 345,400, with occasional removal of up to 690,800 tons in one year.

Under the CCAP as currently adopted, up to 1,001 acres are identified off-channel for potential future commercial mining. The CCAP Update would add an additional 1,188 acres for a total of 2,189 acres. Under the Constrained Implementation Alternative there would be 594 acres identified for future mining, for a total of 1,595 acres. The assumption of one new mining operation extracting up to 1.32 million tons per year would not change as it represents a reasonable future assumption under either scenario.

b. Consistency with Project Objectives

The Constrained Implementation Alternative generally meets the Project objectives with one significant exception. This alternative is inconsistent with and therefore would not achieve the following objective:

- Conduct an analysis of collected data from monitoring programs, habitat restoration, channel stabilization, and reclamation efforts over the prior ten years and use the data analysis as a basis to improve the program

This alternative would only allow 50 percent of the material to be removed associated with in-channel restoration activities relative to the proposed CCAP Update. The annual average maximum amount of material proposed for removal under the CCAP Update was based on sediment deposition monitoring data. Restricting removal to 50 percent of the average annual deposition could constrain the County's ability to base restoration and flood control projects on monitoring programs and data analysis.

c. Analysis of Constrained Implementation Alternative

Under the Constrained Implementation Alternative, future in-channel restoration activities and off-channel mining and processing operations would be similar to those proposed by the CCAP Update, but would be reduced in magnitude. The comparative impacts of this alternative generally fall between those expected to occur as a result of the Project and the No Project Alternative.

Agriculture and Forestry Resources

Because the expansion of the future OCMP mining areas that could result in a loss of farmland and forestry areas under the CCAP Update would be reduced under the Constrained Implementation Alternative, impacts on agricultural and forestry resources would be reduced compared to the proposed Project but would remain significant and unavoidable.

Air Quality

The increased use of diesel-powered equipment associated with both in-channel and off-channel material removal under this alternative would be half that anticipated to occur under the proposed Project. Assuming a 50 percent reduction in in-channel and off-channel activities would result in a 50 percent reduction in use of diesel equipment, the Constrained Implementation Alternative would reduce this impact relative the proposed CCAP Update.

However, even with a 50 percent reduction in emissions, activities under the Constrained Implementation Alternative would continue to exceed YSAQMD thresholds and the impact would remain significant and unavoidable.

Greenhouse Gas Emissions and Energy

The increased use of diesel-powered equipment associated with both in-channel and off-channel material removal under this alternative would be half that anticipated to occur under the proposed Project. Assuming a 50 percent reduction in in-channel and off-channel activities would result in a 50 percent reduction in use of diesel equipment, the Constrained Implementation Alternative would reduce this impact relative the proposed CCAP Update. However, even with a 50 percent reduction in emissions, activities under the Constrained Implementation Alternative would result in a net increase in GHG emissions and the impact would remain significant and unavoidable.

Noise and Groundbourne Vibration

The noise and vibration effects of the activities that would occur under the Constrained Implementation Alternative would be similar to CCAP activities, though reduced because of the reduction in on-road truck trips and associated roadway noise. This alternative would result in decreased truck-related roadway noise (related to decreased truck traffic) as compared to the Project, but those cumulative impacts overall would still be considered significant and unavoidable.

Transportation

The transportation effects of the activities that would occur under the Constrained Implementation Alternative would be similar to CCAP activities, though reduced in magnitude. However the cumulative impact overall would still remain significant and unavoidable.

Potential for New Impacts in Topical Areas Determined to be Less-Than-Significant (With and Without Mitigation) for the Project

The assumed removal of material in-channel and acreage for new future mining off-channel under this alternative would be half that assumed for the proposed Project. As a result impacts in most areas found to be less-than-significant (with and without mitigation) for implementation of the project, would be similar or reduced under the Constrained Implementation Alternative. However, the revisions to the plans and regulatory ordinances identified in the CCAP Update aimed at clarifying and improving CCAP plans, policies, and regulations would still be implemented under this alternative.

Overall, these less-than-significant impacts would occur under both the Project and this alternative. This alternative would likely result in less impact as compared to the Project because there would be less tonnage removed in-channel and less acreage for commercial mining off channel. As such any level of impact generally is likely to be lower under this alternative.

In the area of hydrology and water quality however, impacts from this alternative may exceed those that would occur under the Project. Implementation of the CCAP under the No Project Alternative would affect some hydrological and water quality resources to approximately the same degree as under the proposed CCAP Update. However, the County would be more constrained under this alternative as compared to under the Project, in their ability to encourage and support flood control projects because the existing lower limits on the amount of material that can be removed from the channel in any given year would be artificially capped at a number lower than the results of in-channel monitoring and the Fluvial Geomorphology Study suggest is prudent.

Therefore, implementation of the Constrained Implementation Alternative would be expected to result in new significant hydrology and water quality impacts that would not be mitigated.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify the environmentally-superior alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines Section 15126.6(d)(2) states that if the environmentally-superior alternative is the no project alternative, the EIR shall also identify an environmentally-superior alternative from among the other alternatives.

Based on the evaluation provided above Alternative 1 and the summary included in Table 5-1, No Project Alternative would be the environmentally superior alternative, because it would reduce most impacts as compared to the proposed Project. However, that alternative fails to meet any of the Project objectives or the objectives of the CCAP, and overall that alternative results in significant and unavoidable impacts in all of the same areas as the Project. Moreover, that alternative would be inconsistent with the General Plan and result in new impacts in the areas of hydrology and water quality that would not occur under the proposed project.

The next best ranking environmentally superior alternative would be Alternative 2, Constrained Implementation Alternative. This alternative would result in similar but slightly less environmental impact for those effects identified as significant and unavoidable for the project. However, this alternative fails to meet one of the Project objectives and would result in new impacts in the area of hydrology and water quality.

Neither alternative eliminates impacts found to be significant and unavoidable for the Project. Moreover, the Project fully achieves all of the project objectives and fully mitigates impacts in all other topical areas.

Table 5-1: Comparison of Proposed CCAP Update (Project) and Alternatives

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1	Alternative 2
			No Project	Constrained Implementation
Aesthetics	AES-1: The CCAP Update would not have a substantial adverse effect on a scenic vista.	LTS	<	<
	AES-2: The CCAP Update would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	LTS	<	<
	AES-3: Sediment removal and/or mining operations under the CCAP Update could degrade the existing visual character or quality of public views of the site and its surroundings.	LTS	<	<
	AES-4: Activities under the CCAP Update would not create a new source of substantial light or glare which could adversely affect day or nighttime views in the area.	LTS	=	=
	CUMULATIVE AES-1: Implementation of the OCMP in conjunction with other planned development in the region would contribute cumulatively to aesthetic impacts.	SU	<	<
Agriculture and Forestry Resources	AG-1: The CCAP Update could have the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use.	SU	<	<, SU
	AG-2: The CCAP Update would not conflict with existing zoning for agricultural use or with a Williamson Act contract	LTS	=	=
	AG-3: The CCAP Update could not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	LTS	=	=
	AG-4: The CCAP Update would not have the potential to result in the loss of forest land or conversion of forest land to non-forest use	LTS	=	=
	AG-5: The CCAP Update would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-	LTS	=	=

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1 No Project	Alternative 2 Constrained Implementation
	agricultural use or conversion of forest land to non-forest use			
	CUMULATIVE AG-1: Implementation of the OCMP in conjunction with other planned development in the region would contribute cumulatively to loss of farmland impacts.	SU	<	<, SU
Air Quality	AIR-1: The CCAP Update could conflict with or obstruct implementation of the applicable air quality plan.	SU	<, SU	<, SU
	AIR-2: Under the CCAP Update, the CCAP Program could continue to result in violation of air quality standards and contribute to a cumulatively considerable net increase in an existing or projected air quality violation.	SU	<, SU	<, SU
	AIR-3: The CCAP Update would not expose sensitive receptors to substantial pollutant concentrations.	LTS	<	<
	AIR-4: The CCAP Update would not result in substantial emissions (such as odors and dust) adversely affecting a substantial number of people.	LTS	<	<
	CUMULATIVE AIR-1: Implementation of the CCAP Update in conjunction with other planned development in the unincorporated county would contribute cumulatively to air quality impacts.	SU	<	<
Biological Resources	BIO-1: The CCAP Update could have a substantial adverse effect, either directly or through habitat modifications, on special-status species in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.	LTS	<	<
	BIO-2: The CCAP Update could have a substantial adverse effect on riparian habitat and other sensitive natural community types identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.	LTS	<	<

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1 No Project	Alternative 2 Constrained Implementation
	BIO-3: The CCAP Update could have a substantial adverse effect on State or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS	<	<
	BIO-4: The CCAP Update would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTS	=	=
	BIO-5: The CCAP Update could conflict with local policies or ordinances protecting biological resources, such as tree preservation policies or ordinances.	LTS	=	=
	BIO-6: The CCAP Update would not conflict with the provisions of the adopted Yolo County HCP/NCCP or other approved local, regional, or state habitat conservation plan.	LTS	=	=
	BIO-7: The CCAP Update has the potential to: substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species.	LTS	=	=
Cultural and Tribal Resources	CUL-1: The CCAP Update could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5	S	<	<
	CUL-2: The CCAP Update could cause a substantial adverse change in the significance of a tribal cultural resource (defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe).	LTS	<	<

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1 No Project	Alternative 2 Constrained Implementation
Geology and Soils	GEO-1: The CCAP Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides	LTS	=	<
	GEO-2: Off-channel mining and channel maintenance activities that include excavation would not result in substantial soil erosion or the loss of topsoil	LTS	<	<
	GEO-3: Off-channel mining and channel maintenance activities that include excavation could directly or indirectly destroy a unique paleontological resource site, and could destroy a unique geologic feature	S	<	<
Greenhouse Gas Emissions and Energy	GHG-1: The CCAP Update would generate GHG emissions that may have a significant impact on the environment.	SU	<, SU	<
	GHG-2: The CCAP Update would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS	=	<
	EN-1: The CCAP Update would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation.	LTS	<	<
	EN-2: The CCAP Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	<	<
	CUMULATIVE GHG-1: Implementation of the OCMP in conjunction with other planned development in the region would contribute cumulatively to GHG emissions impacts	SU	<, SU	<, SU
Hydrology and Water Quality	HYD-1: The CCAP Update would not result in increased erosion and sedimentation or violation of any water quality standards or waste discharge requirements, but could otherwise substantially degrade surface or ground water quality by creating conditions that allow for methylmercury to form in wet pit lakes.	S	>	<

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1 No Project	Alternative 2 Constrained Implementation
	HYD-2: The CCAP Update would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin	LTS	=	=
	HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which could result in flooding on- or off-site or impede or redirect flood flows	LTS	>	>
	HYD-4: The CCAP Update could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS	=	=
Noise and Vibration	NOI-1: The CCAP Update would not result in a substantial temporary or periodic increase in ambient noise levels in the vicinity of the Project area above levels existing without the Project.	LTS	<	<
	NOI-2: The CCAP Update would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels	LTS	<	<
	CUMULATIVE NOI-1: Implementation of the OCMP and associated increase in truck trips in conjunction with increased traffic under General Plan build-out would contribute cumulatively to roadway noise impacts	SU	<	<, SU
Transportation	TR-1: The CCAP Update could conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths	LTS	=	=
	TR-2: The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)	LTS	=	=
	TR-3: The CCAP Update could substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	S	<	<

Resource Area	Project Impact	Proposed Project Impact - Level of Significance (after mitigation)	Alternative 1 No Project	Alternative 2 Constrained Implementation
	CUMULATIVE TR-1: Implementation of the OCMP and associated increase in truck trips in conjunction with increased traffic under General Plan build-out would contribute cumulatively to transportation impacts.	SU	<	<, SU

Notes:
LTS: Less than Significant Impact.
S: Significant but Mitigable Impact.
SU: Significant and Unavoidable
<, SU: Reduced impact relative to CCAP Update, but impact remains Significant and Unavoidable
= Impacts same as Project.
< Fewer impacts (less severe) than proposed Project.
> More impacts (greater) than proposed Project.

5.6 POSSIBLE ALTERNATIVES CONSIDERED BUT REJECTED FOR FURTHER ANALYSIS

3. Rescind CCAP Alternative

This alternative assumes the County would terminate the CCAP program, effectively ending coordinated planning for in-channel maintenance and restoration activities, and ending comprehensive planning for future potential off-channel mining. Under this alternative the CCRMP and the OCMP would be rescinded. Currently approved off-channel mining operations would continue including implementation of executed Development Agreements and the commitments those agreements contain. The CCAP program would be rescinded, SGR overlay zoning on existing land would be removed and no new SGR overlays would be designated.

This alternative is considered infeasible and is not considered further for a number of reasons. It would not satisfy the basic objectives of the CCAP and goals of the County to: 1) stabilize the Cache Creek channel and provide a mechanism to manage flooding; 2) regulate and control off-channel mineral resources extraction; and 3) balance mining against other valuable considerations, including water resources, agriculture, wildlife, aesthetics, and recreation. It would also fail to achieve the project objectives of satisfying the regulatorily mandated update of the program to enable a consideration of collected data and modifications to the program to integrate the monitoring and modeling results. It would be inconsistent with state policy on the management of mineral resources to ensure accessibility and reasonable use. New future mining applications would be evaluated in absence of a coordinated set of policies and programs resulting in greater potential for adverse environmental impact. It would abandon a lauded program recognized by the state and in the industry as a template for mineral resources management. It would be inconsistent with the Yolo Countywide General Plan. It would be inconsistent with community values as evidenced by November 1996 vote on the program when placed on the County ballot by the Board of Supervisors as a legislative referendum. It would potentially harm the success of the emerging Cache Creek Parkway which is a mandated benefit of the program.

4. Restructured CCAP Alterative

This alternative is a variation of the Rescind CCAP Alternative above. It would involve rescission of the in-channel components of the CCAP (CCRMP. CCIP, In-Channel Ordinance, Flood Ordinance) in favor of the off-channel components (OCMP, Mining Ordinance, Reclamation Ordinance, Fee Ordinance), or rescission of the off-channel components in favor of the in-channel program. This alternative is infeasible on its face for the same reasons provided above for the Rescind CCAP Alternative. It also fails to recognize that critical links between the two components of the program for purposes of achieving the mitigated outcomes and beneficial results.

5. Modify Horizon Year Alternative

This alternative would modify the horizon year of the CCAP to be approximately consistent with the horizon year of the current Countywide General Plan, which is 2030. Since the CCAP project utilizes the analyses included in the General Plan and General Plan EIR, the CCAP horizon year under this alternative would be 2035 (later than the actual General Plan horizon) to allow the County time to complete a general plan update process before the CCAP time horizon is extended in a subsequent update process. This alternative would not reduce the severity of any of the impacts that have been identified for the CCAP Update, and therefore does not satisfy a basic CEQA requirement (CEQA Guidelines 15126.6) for selection of alternatives.

6. Different Location Alternative

The County has determined that no feasible alternative locations exist. This determination was made because there are no other known suitable aggregate resource areas mapped within the County. Based on review of mineral resource zone mapping, there are no other MRZ-2[1] areas within Yolo County.[2] The only potential alternative location in the area would be lower Putah Creek, however mining in or along this waterway has been precluded for years and would be highly disruptive both environmentally, as well as in terms of community values and support. This alternative would not reduce the severity of any of the impacts that have been identified for the CCAP Update, and therefore does not satisfy a basic CEQA requirement (CEQA Guidelines 15126.6) for selection of alternatives.

[1] Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present.(as shown on the diagram of the California Mineral Land Classification System).

[2] California Department of Conservation, Division of Mines and Geology, 1988, Mineral Land Classification: Portland Cement Concrete-Grade Aggregate in the Sacramento-Fairfield Production-Consumption Region, Special Report 156. Accessed: https://archive.org/details/minerallandclass156dupr/page/n15