

CHAPTER 6. ALTERNATIVES TO THE PROJECT

6.1 INTRODUCTION

CEQA Guidelines Section 15126.6 requires that an EIR describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the basic project objectives and avoid or substantially lessen any of the significant project impacts. The Guidelines set forth the following criteria for alternatives:

- *Identifying Alternatives.* The range of alternatives is limited to those that would avoid or substantially lessen any of the significant adverse effects of the project, are potentially feasible, and would attain most of the basic objectives of the project. An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative. The specific alternative of ‘no project’ shall also be evaluated along with its impact.
- *Range of Alternatives.* An EIR need not consider every conceivable alternative, but must consider a reasonable range of alternatives that will foster informed decision-making and public participation. The “rule of reason” governs the selection and consideration of EIR alternatives, requiring that an EIR set forth only those alternatives necessary to permit a reasoned choice.
- *Evaluation of Alternatives.* EIRs are required to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. Matrices may be used to display the major characteristics of each alternative and significant adverse environmental effects of each alternative to summarize the comparison. If an alternative would cause one or more significant adverse effects in addition to those that would be caused by the project as proposed, the significant adverse effects of the alternative must be discussed but in less detail than the significant effects of the project. In general, there are two types of alternatives that may be reviewed in an EIR: (1) alternatives *to* the project that are other projects entirely, or other approaches to achieving the project objectives rather than the project or modified project; and (2) alternatives *of* the project that include modified project components, such as alternative project processes and/or modified facilities, layout, size, and scale. This alternatives analysis evaluated only one type of alternative: alternatives *of* the project, since the objectives of the project are to install an erosion control plan for earthmoving activities on slopes greater than 5% associated with a subsequent installation of a new vineyard and there is no reasonable range of

alternatives or other approaches to the proposed project that would achieve the project objectives.

In accordance with the CEQA Guidelines, the alternatives considered in this EIR include those that 1) could accomplish most of the basic objectives of the project, and 2) could avoid or substantially lessen one or more of the significant effects of the project. To provide the appropriate context for this alternatives analysis, the project objectives and key significant effects are summarized below. CEQA mandates the discussion of the No-Project Alternative {CEQA Guidelines Section 15126.6(e)}. The No-Project Alternative must examine the existing conditions and reasonably foreseeable future conditions that would exist if the project were not approved. If the environmentally superior alternative is the No-Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives.

It is noted that after submitting the Erosion Control Plan Application to the County, the applicant – Rodgers Land and Development Company of Napa, met with Napa County planners and environmental consultants to review the initial plan. The applicant revised the plan to incorporate various elements into the design of the Erosion Control Plan and subsequent vineyard operations. These include creating additional wildlife passages between vineyard blocks, preserving areas with sensitive plant species, preserving areas cultural resources, and providing better traffic visibility and safety by redesigning and relocating the main access for the vineyard 300 feet south of the existing entrance.

The two alternatives to the Project discussed in this chapter include the following:

- The No Project Alternative, which assumes the continuation of existing conditions on the Project site; and
- The Resource Conservation Alternative, which would avoid disturbance of 0.26 acres native perennial grassland near Silverado Trail by reducing the size of Vineyard Block 14; and would avoid disturbance of 1.37 acres serpentine grassland by eliminating Vineyard Block 52 from development.

In the absence of mitigation, the Project would have a significant impact on biological resources, cultural resources and hydrology and water quality. The following discussion describes each alternative and considers whether it would have a mitigating or adverse effect on the environment, when compared to the Project. Section 6.3 provides a summary comparison of impacts, and Section 6.4 discusses the environmentally superior

alternative. A discussion of alternatives considered, but eliminated from detailed analysis is included in Section 6.5.

6.1.1 No Project Alternative

As directed by the CEQA Guidelines [Section 15126.6 (e)(3)(B)], when a project consists of a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, the “no project” consequence should be discussed.

The No Project Alternative assumes no development on the Project site. The site would remain an undeveloped open space area. Grazing could continue to occur on the Project site under this alternative, as allowed by the Napa County General Plan and zoning for the site.

6.1.2 Comparative Analysis

Biological Resources

Under the No Project Alternative, existing habitat would not be disturbed by earthmoving activities associated with a new vineyard, including oak woodlands, native grassland and serpentine grassland. ***It is assumed that cattle grazing would continue on the property at the current level of 50 head of cattle, and that grazing would occur during spring and summer with some supplemental feed. The cattle would continue to be moved off the property during the fall and winter to allow vegetation to grow back.*** The absence of construction activities under the No Project Alternative would result in fewer short term impacts to biological resources, ~~including those to special status bird species noted above.~~ ***such as those that were identified for the proposed project in Section 4.1 of this document.*** Like the proposed project, wildlife corridors would not be interrupted or fragmented under the No Project Alternative. However, there would be a greater likelihood of indirect impacts to the coast range newt and fisheries under the No Project Alternative because ~~there would be~~ greater sediment loads in watercourses ***would result when compared to than under*** the proposed project.

Geology and Soils

The No Project Alternative would not involve earthmoving activities or vegetation removal, and therefore would not lead to increased erosion resulting from the use of

farm equipment, including tractors, trenchers and backhoes, and from the removal of the project site's existing vegetation during grading. Due to continued cattle grazing on the property, it is assumed that current levels of surface erosion in areas outside of the proposed vineyard blocks would remain unchanged.

Hydrology and Water Quality

Under the No Project Alternative, cattle grazing would continue to occur on the project site, and no new vineyard development would occur. Because erosion control measures would not be installed, erosion by wind and weather would be greater under the No Project Alternative than under the proposed project. Similarly, ***sediment transport to watercourses would be greater under the No Project Alternative because erosion control measures such as new cover crops and mechanical contouring, which reduce sediment transport from the site, would not be established as proposed. In addition, it is assumed that cattle grazing would continue on the property under the No Project Alternative, which would continue to contribute to sediment yield and transport at their current levels.***

6.2 RESOURCE CONSERVATION ALTERNATIVE

Under the Resource Conservation Alternative (RCA), the ECPA and subsequent vineyard development would result in the disturbance of existing habitat. However, the RCA would avoid disturbance of serpentine grassland (approximately 1.37 acres of the total 8.47 acres on-site) by eliminating the vineyard development of Block 52, and would avoid disturbance of the existing native perennial grassland on the site (approximately 0.26 of the total 0.85 acres on-site) by reducing the size of Vineyard Block 14 ***and providing a thirty-foot minimum natural buffer around the grassland as protection.*** Under this alternative, the total size of the project would be reduced from approximately 161 acres to approximately 157 acres, ***and none of the existing serpentine grassland or native perennial grassland would be disturbed as a result of vineyard development.*** The vineyard layout plan for the RCA is shown in **Figure 6-1. A detail of the 30-foot minimum natural buffer area is shown in Figure 6-1a.**

6.2.1 Comparative Analysis

Biological Resources

Under the RCA, the existing natural habitat would be removed in order to make way for the ECPA installation and subsequent vineyard blocks, as discussed in this document's Biological Resources chapter. However, unlike the proposed project, this alternative would exclude development of all of Block 52 and about half of Block 14, thereby

preserving 1.37 acres of sensitive serpentine grassland and 0.26 acres of native perennial grassland located in those block areas. *As a result, the loss of serpentine grassland and native perennial grassland that would occur with the proposed project, which would be a considerable contribution to a significant County-wide cumulative impact, would be avoided under the RCA.*

Significant cumulative impacts related to loss of oak woodlands would be mitigated with implementation of Mitigation Measure 5.2-1, as is the case of the proposed project.

Insert Figure 6-1:

Resource Conservation Alternative Vineyard Layout Plan

Back of 6-1

Insert 6-1a “Buffer” for Block 14 grasslands

Geology and Soils

The RCA would result in a slightly smaller intensity vineyard development. This alternative would require earthmoving activities on slopes greater than 5% associated with a subsequent vineyard of less acreage. The overall layout of the ECPA and subsequent vineyard would be similar to the proposed project, with the exception that Vineyard Block 52 would be eliminated and Block 14 would be reduced in size, resulting in a slightly larger sediment yield than for the proposed project, but less than the No Project Alternative. Since vineyard installation, including erosion and sediment control activities, will be eliminated in Block 52 and a portion of Block 14, sediment yield from these catchments may be slightly larger than for the proposed project. During construction/installation of the erosion control measures and features, and the subsequent vineyard blocks, disturbed soils would be exposed to the erosive forces of wind and rain.

Hydrology and Water Quality

The RCA would result in similar hydrology and water quality related impacts that were identified for the proposed project, which were determined to be less than significant after mitigation. The RCA would also alter the project site's existing drainage pattern and characteristics of the project site. However, despite a slight decrease in the total acreage, the impacts associated with the RCA would be similar to those resulting from the proposed project, and mitigation measures identified for the proposed project would also apply to the RCA.

6.3 SUMMARY OF COMPARATIVE IMPACTS

This section summarizes the comparative impacts of each of the alternatives when compared to the Project. **Table 6-1** lists the level of significance of the impacts of the Project to each environmental area analyzed and shows whether the impacts anticipated under each alternative would be equal, lesser, or greater than the Project.

**Table 6-1
Summary of Environmental Constraints**

ALTERNATIVE	BIOLOGICAL	CULTURAL	GEOLOGY	HYDROLOGY
02-454 ECPA (Proposed Project)	LTS with mitigation for project-level impacts; significant and unavoidable cumulative impact on serpentine grassland and native perennial grassland	LTS with mitigation	LTS with mitigation	LTS with mitigation
No Project	Existing condition would remain	Existing condition would remain	Existing condition would remain	Existing condition would remain
Resource Conservation Alternative (RCA)	Impact less than project < Cumulative impact on grasslands would be avoided altogether. Cumulative impacts on oak woodlands would be mitigated as with the proposed project.	Impact similar to project =	Impact similar to project = Slightly larger sediment yield would result as compared to the proposed project since vineyard installation, including erosion and sediment control activities, will be eliminated in Block 52 and a portion of Block 14.	Impact similar to project = Despite a slight decrease in the total acreage, the hydrology impacts associated with the RCA would be similar to those resulting from the proposed project, and mitigation measures identified for the proposed project would also apply to the RCA.

LTS means: Less than significant

= means: same as proposed project 02-454

< means: less than proposed project

> means: greater than proposed project

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. If the “No Project” alternative is determined to be the environmentally superior alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives [CEQA Guidelines Section 15126.6(e)]. Identification of an environmentally superior alternative results from a comparison of impacts that would result from each alternative, as shown in Table 6-1. This table presents a comparative evaluation of the ability of each alternative to avoid or substantially reduce any significant impact of the Project. The table shows the level of significance after mitigation for each significant impact of the Project.

The Resource Conservation Alternative (**RCA**) would be the environmentally superior alternative because it would further reduce impacts to biological resources by preserving the native perennial grassland and the sensitive serpentine grasslands *on the site, though it would lead to slightly greater geology impacts as compared to the proposed project. This is due to slightly larger sediment yields under the RCA, attributable to the elimination of Vineyard Block 52 and a reduced Vineyard Block 14 due to the avoidance of native perennial grassland and buffer area. The No Project Alternative would result in no biological resources impacts, but would result in greater geology impacts than the RCA, due to the absence of erosion control measures that would be installed with the RCA. Therefore, when considering the full range of potential environmental effects, the RCA, with implementation of mitigation measures identified for the project, would be the environmentally superior alternative because it would avoid the loss of serpentine grassland and native perennial grassland, and would have less geology impacts than the No Project Alternative, because of the erosion control measures that would be installed with implementation of the RCA.*

6.5 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS

During review of the preliminary Erosion Control Plan (dtd 2002) for approximately 176 acres of new vineyard, it was found that the Plan would lead to the elimination of sensitive native grasslands, limit wildlife movement on the project site, and would result in poor roadway sightlines at the existing Silverado Trail access point. The original project has been modified several times to reduce impacts to sensitive resources and to facilitate wildlife movement. Earlier iterations of the project were eliminated from further detailed analysis because the currently proposed project and its alternatives present more environmentally friendly options toward fulfilling the project applicant's objectives.