



## **City of Wheatland**

**111 C Street – Wheatland, California 95692**  
**Tel (530) 633-2761 – Fax (530) 633-9102**

**DATE:** March 29, 2024

**TO:** California State Clearinghouse  
Responsible and Trustee Agencies  
Interested Parties and Organizations

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING FOR THE HERITAGE OAKS ESTATES EAST PROJECT**

**REVIEW PERIOD:** March 29, 2024 through April 29, 2024

The City of Wheatland Community Development Department is the lead agency for the preparation of an Environmental Impact Report (EIR) for the development of the Heritage Oaks Estates East Project (proposed project). The scope of the EIR has been proposed based on a determination by the City of Wheatland. The City of Wheatland has directed the preparation of this EIR in compliance with the California Environmental Quality Act (CEQA).

Once a decision is made to prepare an EIR, the lead agency must prepare a Notice of Preparation (NOP) to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines, Section 15082). The purpose of the NOP is to provide agencies with sufficient information describing both the proposed project and the potential environmental effects to enable the agencies to make a meaningful response as to the scope and content of the information to be included in the EIR. The City of Wheatland is also soliciting comments on the scope of the EIR from interested parties and organizations.

**NOP COMMENT PERIOD:** Written comments should be submitted at the earliest possible date, but not later than 5:00 PM on April 29, 2024, to Kevin Valente, Senior Planner, Wheatland Community Development Department, 111 C Street, Wheatland, CA 95692, (916) 372-6100, fax (916) 419-6108, or [kvalente@raneymanagement.com](mailto:kvalente@raneymanagement.com).

**SCOPING MEETING:** A public scoping meeting will be held by the City to inform agencies and interested parties regarding the EIR for the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope of the EIR. The

scoping meeting will be held in-person at the following address on April 25, 2024 at 6:00 PM:

Wheatland Community Center  
101 C Street  
Wheatland, CA 95692

## **PROJECT DESCRIPTION**

### **Project Location and Setting**

The approximately 148.70-acre project site, identified by Assessor's Parcel Numbers (APNs) 015-490-023 through -028 and 015-720-009 through -013, is located west of State Route (SR) 65 and south of Main Street in the City of Wheatland, California, and is currently undeveloped (see Figure 1). Surrounding existing uses include the Grasshopper Slough, single-family residences, multi-family residences, and commercial uses to the north; Union Pacific Railroad (UPRR) tracks and agricultural land to the east, across SR 65; Bear River, the City of Wheatland Wastewater Treatment Plant (WWTP), and agricultural land to the south; and agricultural land, undeveloped land, and Bishop's Pumpkin Farm to the west (see Figure 2). The City of Wheatland General Plan designates the site as Low Density Residential (LDR) and Park, and the project site is zoned Planned Development (PD).

### **Project Background**

An EIR was originally prepared in 2002 for the entire Heritage Oaks Estates project, which included the project site as well as the 92-acre Heritage Oaks Estates West site. The 2002 project required approval of Annexation into the City of Wheatland, a General Plan Amendment, and a Rezone. The Heritage Oaks Estates site was later divided into Heritage Oaks Estates West and Heritage Oaks Estates East. An Initial Study was prepared for the Heritage Oaks Estates East project in 2005, and City Council approved a Development Agreement and Tentative Subdivision Map; however, both entitlements have since expired. The EIR prepared for the proposed project will only include an analysis of the Heritage Oaks Estates East project site.

### **Project Components**

The proposed project would generally include the development of the project site with up to 685 single-family residences, as well as various associated improvements, including, but not limited to, several community parks, a landscape corridor, open space, an internal roadway system, and various landscaping and utility improvements.

The proposed project would require City approval of a General Plan Amendment, Rezone and associated General Development Plan, Vesting Tentative Subdivision Map, and Site Plan and Design Review, as discussed below.



**Figure 2**  
**Project Location**



## General Plan Amendment

Due to the project's proposed lot sizes, the proposed project would require approval of a General Plan Amendment to change the site's designation from LDR to Low-Medium Density Residential (LMDR) and Medium Density Residential (MDR). The LMDR designation provides for single-family detached residences, secondary residential units, public and quasi-public uses, and similar compatible uses within a density range of 4.1 to 6.0 dwelling units per acre (du/ac). The MDR land use designation provides for the same residential uses, as well as single-family attached residences, within a density range of 6.1 to 8.0 du/ac. The net density of the residential villages would be 6.51 du/ac, while the gross density based on the total acreage would be 4.58 du/ac.

## Rezone and General Development Plan

The proposed project would require approval of a Rezone to amend the PD zoning district and establish site-specific development standards. Pursuant to Section 18.51.060 of the Wheatland Municipal Code, the uses within the PD zoning district shall be limited to the uses contained within the approved development plan and pre-existing uses, as defined by Chapter 18.70 of the Municipal Code. Accordingly, the Heritage Oaks Wheatland General Development Plan has been prepared to establish the design standards for the site with specific criteria to assist the City in its review of the proposed project. Unless otherwise specified within the General Development Plan, such as variations in lot sizes and setback lengths, the proposed project would adhere to all applicable City zoning and Municipal Code requirements. Such standards and regulations are designed to reflect site characteristics, as well as establish development and design objectives that differ from the City's typical development standards for the proposed on-site uses.

## Vesting Tentative Subdivision Map

The proposed Vesting Tentative Subdivision Map includes subdivision of the site into 681 single-family residential lots (see Figure 3). The single-family residential lots would be grouped into 10 "villages," which would each include between 35 and 101 lots. A summary of each village's lot sizing, acreage, number of lots, and density is included in Table 1 below. It should be noted that, for conservative purposes, the environmental analysis for the proposed project will be based on development of up to 685 residential units.

## *Parks, Open Space, and Landscaping*

The proposed project would include approximately 25 acres of open space and recreational areas, including four parks, the Malone Paseo, and passive open space. The four parks would range in size from approximately 2.0 to 9.9 acres. The northernmost park would consist of lots A, C, K, and L, totaling approximately 9.9 acres, located adjacent to Grasshopper Slough. The park would be designed as a community park and include a play structure, lawn games, sport courts, and multi-use areas that would provide sports play field areas while also serving as a stormwater and water quality control basin.

**Figure 3**  
**Vesting Tentative Subdivision Map**

**VESTING TENTATIVE SUBDIVISION MAP**  
**TSTM 2023-0001 (LARGE AND SMALL LOT)**  
**HERITAGE OAKS ESTATES - EAST**

WHEATLAND, CALIFORNIA  
NOVEMBER 2022 - REVISED MARCH 25, 2024  
PAGE 1 OF 4

**LAND USE SUMMARY**

**VILLAGE AND LOT SUMMARY\***

VILLAGE 1 (50'X100' TYP) = 72 LOTS	13.00 AC	5.54 DU/AC
VILLAGE 2 (45'X100' TYP) = 71 LOTS	10.56 AC	6.72 DU/AC
VILLAGE 3 (45'X80' TYP) = 89 LOTS	11.05 AC	8.05 DU/AC
VILLAGE 4 (50'X80' TYP) = 80 LOTS	11.11 AC	7.20 DU/AC
VILLAGE 5 (50'X100' TYP) = 35 LOTS	06.00 AC	5.83 DU/AC
VILLAGE 6 (45'X100' TYP) = 101 LOTS	15.67 AC	6.45 DU/AC
VILLAGE 7 (45'X95' TYP) = 49 LOTS	07.47 AC	6.56 DU/AC
VILLAGE 8 (50'X100' TYP) = 50 LOTS	08.08 AC	6.19 DU/AC
VILLAGE 9 (50'X90' TYP) = 70 LOTS	11.99 AC	5.84 DU/AC
VILLAGE 10 (45'X95' TYP) = 64 LOTS	09.73 AC	6.58 DU/AC
<b>SUBTOTAL = 681 LOTS**</b>	<b>104.66 AC</b>	<b>6.31 DU/AC</b>

MAJOR ROAD - DEVALENTINE PKWY	3.94 AC
MAJOR ROAD - RED OAK DRIVE	3.71 AC
MAJOR ROAD - HERITAGE OAK WAY	3.40 AC
LOT A - DETENTION PARK	2.98 AC
LOT B - WATER WFT1 STP #1	0.78 AC
LOT C - NORTH PARK (EAST)	0.93 AC
LOT D - MALONE PASEO (NORTH)	0.85 AC
LOT E - SR 65 PASEO LANDSCAPE	1.33 AC
LOT F - FUTURE MULTIFAMILY	0.46 AC
LOT G - MALONE PASEO (CENTRAL)	0.49 AC
LOT H - MALONE PASEO (CENTRAL)	0.53 AC
LOT I - MALONE PASEO (CENTRAL)	0.38 AC
LOT J - MALONE PASEO (CENTRAL)	0.55 AC
LOT K - NORTH PARK (WEST)	0.54 AC
LOT L - MULTI-USE POND/PARK	5.41 AC
LOT M - SR 65 PASEO LANDSCAPE	0.78 AC
LOT N - SR 65 PASEO LANDSCAPE	0.51 AC
LOT O - SR 65 PASEO LANDSCAPE	1.19 AC
LOT P - RIVERSIDE PARK	2.00 AC
LOT Q - LEVEE ROW	5.99 AC
LOT R - RIVERSIDE OPEN SPACE	2.83 AC
LOT S - COMMUNITY PARK	5.34 AC
<b>SUBTOTAL =</b>	<b>44.04 AC</b>
<b>TOTAL =</b>	<b>148.70 AC</b>

**\*\*ALL ACRES AND DENSITIES EXCEPT MAJOR ROADS**  
**\*\*ENTITLEMENTS ARE BASED ON 681 LOTS AND GROSS DENSITY OF 4.61 DU/AC**

**SURVEYORS STATEMENT:**  
I HEREBY STATE THAT ALL EASEMENTS OF RECORD ARE SHOWN AND LABELED PER PRELIMINARY TITLE REPORT BY FIRST AMERICAN TITLE COMPANY ORDER NUMBER 5102-593317 DATED DECEMBER 30, 2022.



SEAN MINARD, P.E. 52593, P.L.S. 8397

**LEGAL DESCRIPTION:**  
REAL PROPERTY IN THE CITY OF WHEATLAND, COUNTY OF YUBA, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

**PARCEL ONE:**  
LOTS A, B, C, 1, 2, 4, AND 5, AS SHOWN ON THE MAP ENTITLED "HERITAGE OAKS ESTATES EAST LARGE LOT FINAL MAP", TRACT NO. 2006-019, FILED IN THE OFFICE OF THE COUNTY RECORDER OF YUBA COUNTY, STATE OF CALIFORNIA ON DECEMBER 12, 2007 IN BOOK 88 OF MAPS, AT PAGES 27 THROUGH 32.

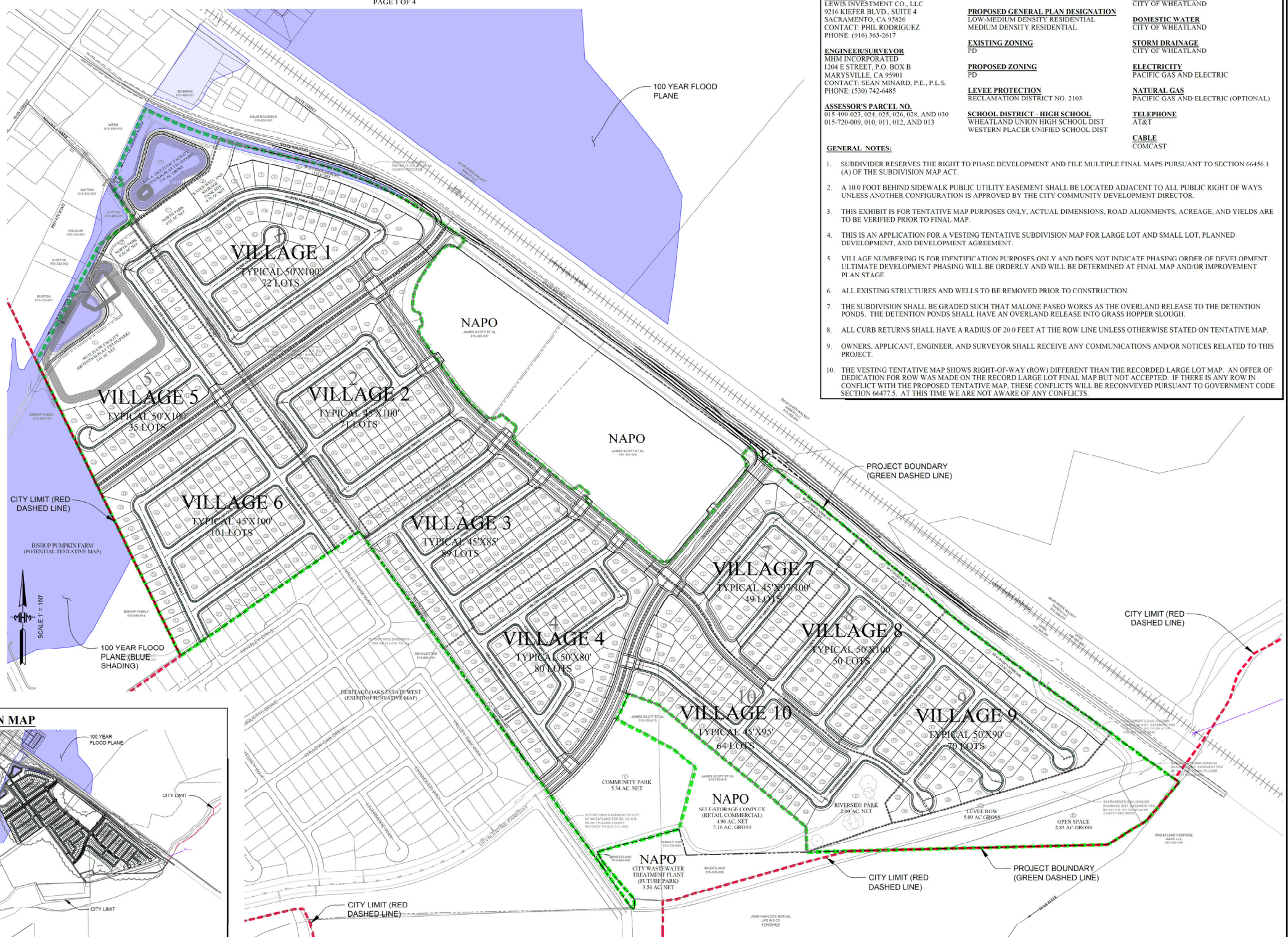
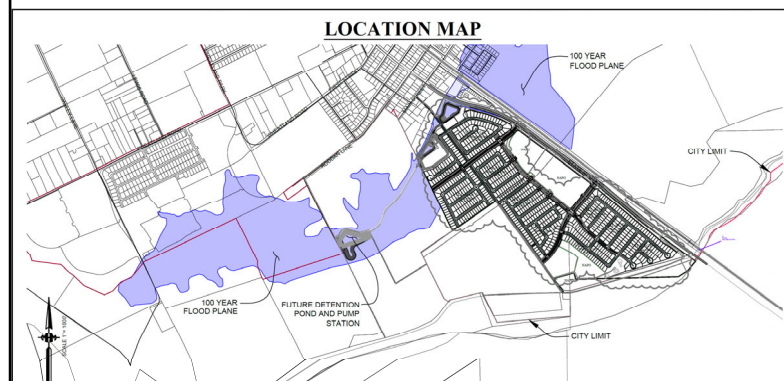
APN: 015-490-023, 015-490-024, 015-490-025, 015-490-026, 015-490-028, 015-720-009, 015-720-010, 015-720-011, 015-720-012 & 015-720-013.

**PARCEL TWO:**  
THE STREETS SHOWN AS HERITAGE OAKS PARKWAY, BLUE OAK PARKWAY AND DEVALENTINE PARKWAY ON THE MAP ENTITLED "HERITAGE OAKS ESTATES EAST LARGE LOT FINAL MAP", TRACT NO. 2006-019, FILED IN THE OFFICE OF THE COUNTY RECORDER OF YUBA COUNTY, STATE OF CALIFORNIA ON DECEMBER 12, 2007 IN BOOK 88 OF MAPS, AT PAGES 27 THROUGH 32.

APN 015-490-030-000

**CITY OF WHEATLAND APPROVAL:**  
THE CITY OF WHEATLAND PLANNING COMMISSION HAS CONSIDERED AND APPROVED RESOLUTION 24-00X APPROVING TENTATIVE PARCEL MAP NO. 2023-0001 DURING THE PLANNING COMMISSION MEETING ON \_\_\_\_\_, 2024.

CITY OF WHEATLAND \_\_\_\_\_ DATE: \_\_\_\_\_



**SUBDIVIDER STATEMENT**

**OWNER**  
LEWIS INVESTMENT CO., LLC  
9216 KIEFER BLVD., SUITE 4  
SACRAMENTO, CA 95826  
CONTACT: PHIL RODRIGUEZ  
PHONE: (916) 363-2617

**APPLICANT**  
LEWIS INVESTMENT CO., LLC  
9216 KIEFER BLVD., SUITE 4  
SACRAMENTO, CA 95826  
CONTACT: PHIL RODRIGUEZ  
PHONE: (916) 363-2617

**ENGINEER/SURVEYOR**  
MIM INCORPORATED  
1204 E STREET, P.O. BOX B  
MARYSVILLE, CA 95901  
CONTACT: SEAN MINARD, P.E., P.L.S.  
PHONE: (530) 742-6485

**ASSESSOR'S PARCEL NO.**  
015-490-023, 024, 025, 026, 028, AND 030  
015-720-009, 010, 011, 012, AND 013

**GENERAL NOTES:**

- SUBDIVIDER RESERVES THE RIGHT TO PHASE DEVELOPMENT AND FILE MULTIPLE FINAL MAPS PURSUANT TO SECTION 66456.1 (A) OF THE SUBDIVISION MAP ACT.
- A 10.0 FOOT BEHIND SIDEWALK PUBLIC UTILITY EASEMENT SHALL BE LOCATED ADJACENT TO ALL PUBLIC RIGHT OF WAYS UNLESS ANOTHER CONFIGURATION IS APPROVED BY THE CITY COMMUNITY DEVELOPMENT DIRECTOR.
- THIS EXHIBIT IS FOR TENTATIVE MAP PURPOSES ONLY, ACTUAL DIMENSIONS, ROAD ALIGNMENTS, ACREAGE, AND YIELDS ARE TO BE VERIFIED PRIOR TO FINAL MAP.
- THIS IS AN APPLICATION FOR A VESTING TENTATIVE SUBDIVISION MAP FOR LARGE LOT AND SMALL LOT, PLANNED DEVELOPMENT, AND DEVELOPMENT AGREEMENT.
- VILLAGE NUMBERING IS FOR IDENTIFICATION PURPOSES ONLY AND DOES NOT INDICATE PHASING ORDER OF DEVELOPMENT. ULTIMATE DEVELOPMENT PHASING WILL BE ORDERLY AND WILL BE DETERMINED AT FINAL MAP AND/OR IMPROVEMENT PLAN STAGE.
- ALL EXISTING STRUCTURES AND WELLS TO BE REMOVED PRIOR TO CONSTRUCTION.
- THE SUBDIVISION SHALL BE GRADED SUCH THAT MALONE PASEO WORKS AS THE OVERLAND RELEASE TO THE DETENTION PONDS. THE DETENTION PONDS SHALL HAVE AN OVERLAND RELEASE INTO GRASS HOPPER SLOUGH.
- ALL CURB RETURNS SHALL HAVE A RADIUS OF 20.0 FEET AT THE ROW LINE UNLESS OTHERWISE STATED ON TENTATIVE MAP.
- OWNERS, APPLICANT, ENGINEER, AND SURVEYOR SHALL RECEIVE ANY COMMUNICATIONS AND/OR NOTICES RELATED TO THIS PROJECT.
- THE VESTING TENTATIVE MAP SHOWS RIGHT-OF-WAY (ROW) DIFFERENT THAN THE RECORDED LARGE LOT MAP. AN OFFER OF DEDICATION FOR ROW WAS MADE ON THE RECORDED LARGE LOT FINAL MAP BUT NOT ACCEPTED. IF THERE IS ANY ROW IN CONFLICT WITH THE PROPOSED TENTATIVE MAP, THESE CONFLICTS WILL BE RECONVEYED PURSUANT TO GOVERNMENT CODE SECTION 66477.5. AT THIS TIME WE ARE NOT AWARE OF ANY CONFLICTS.

<b>Village</b>	<b>Typical Lot Size (feet)</b>	<b>Number of Lots</b>	<b>Acreage</b>	<b>Density (du/ac)</b>
1	50 x 100	72	13.00	5.54
2	45 x 100	71	10.56	6.72
3	45 x 85	89	11.05	8.05
4	50 x 80	80	11.11	7.20
5	50 x 100	35	6.00	5.84
6	45 x 100	101	15.67	6.45
7	45 x 97	49	7.47	6.56
8	50 x 100	50	8.08	6.19
9	50 x 90	70	11.99	5.84
10	45 x 95	64	9.67	6.58
<b>Totals</b>		<b>681</b>	<b>104.66<sup>1</sup></b>	<b>6.51</b>
<sup>1</sup> The remaining site acreage would be developed with various landscaping, roadway, and utility improvements, as discussed below.				

An approximately two-acre park identified on the Vesting Tentative Subdivision Map as Riverside Park would be located adjacent to Villages 9 and 10 in the southern portion of the site and include preserved oak trees surrounded by benches and tables to create a picnic area. An approximately 5.1-acre park would be located between Village 4 and the WWTP, though the park may be expanded in the future following the repurposing of the WWTP. The park would be designed as a community park and include play structures, sports courts, and sports play fields. On lots Q and R, south of Village 9, would include Approximately 7.9 acres of passive recreation area adjacent to the Bear River would be provided on lots Q and R, south of Village 9.

In addition, the proposed project would include the development of the approximately 2.80-acre Malone Paseo trail corridor, which would run adjacent to Malone Avenue throughout the central portion of the site to link the north and south villages. The paseo would include a 10-foot-wide meandering multi-use pathway and a landscape strip along one street edge. Furthermore, an approximately 4.62-acre landscape corridor located along SR 65 to the east would provide a buffer between the proposed residences and SR 65 and include a combination of landscaping and meandering sidewalks, as well as a six-foot concrete masonry wall.

Each residential lot would include front yard landscaping along the street between the front curb and the face of the residences with a minimum of one tree and one shrub. Residential lots with side yards adjacent to the public street or visible to the public would include a planter area along the private fencing. Turf from drought-resistant sod would be provided in areas of high visibility to provide a permanent green area within the landscaped yard.

### *Circulation*

Site access would be provided by Malone Avenue, which runs in a northwest-to-southeast direction through the project site and continues to travel southeast as a portion of the project site's western boundary. The proposed project would also include development of two roadways, DeValentine Parkway and Red Oak Drive, which would connect to SR 65 at the project site's eastern boundary, and provide two additional access points to the project site.

The proposed internal collector streets would connect to form a semi-grid pattern within the project site, and would provide access to the proposed residential units and parks.

The proposed project would include a multimodal network for pedestrians and bicyclists by way of the Malone Paseo trail corridor and SR 65 landscape corridor. Malone Paseo would provide an internal north-to-south connection between the proposed residential units along Malone Avenue. The corridor would include a 10-foot-wide meandering pathway for pedestrian and bicycle uses, and a landscape strip along one street edge. Sidewalk connections would also be provided throughout the site's internal roadway network.

### *Utilities*

The proposed project would include new connections to existing utility infrastructure in the vicinity of the project site. Water, sanitary sewer, and storm drainage services would be provided by the City of Wheatland. Gas and electricity services would be provided by the Pacific Gas and Electric Company (PG&E). Finally, telecommunications and cable services would be provided by AT&T and Comcast.

### Site Plan and Design Review

Pursuant to City of Wheatland Municipal Code Chapter 18.67, residential development projects with more than four units are subject to the City's Site Plan and Design Review process. The City's Site Plan and Design Review process allows various City departments or public agencies, such as the fire district, city engineer, police department, building department, public works, planning director and any other affected city departments or public agencies, to evaluate the proposed project's compliance with the City of Wheatland's standards and regulations.

### Project Entitlements

The entitlements requested with the application for the Heritage Oaks Estates East Project include the following:

- General Plan Amendment from LDR to MDR;
- Rezone to amend the PD zoning district and General Development Plan to establish site development standards;
- Vesting Tentative Subdivision Map; and
- Site Plan and Design Review.

### **ENVIRONMENTAL EFFECTS**

The following paragraphs provide a general discussion of the anticipated topics that will be included in the technical sections of the EIR. Each technical section will include an analysis of the existing environmental setting, identification of the thresholds of significance, description of the methodology used for analysis, identification of impacts, and the development of mitigation measures and monitoring strategies, if necessary, to reduce impacts.



## **Air Quality and Greenhouse Gas Emissions**

The air quality and greenhouse gas (GHG) emissions analysis for the proposed project will be performed using the California Emissions Estimator Model (CalEEMod) software program and following the Feather River Air Quality Management District (FRAQMD) guidelines.

The air quality impact analysis will include a quantitative assessment of short-term (i.e., construction) and long-term (i.e., operational) increases of criteria air pollutant emissions of primary concern (i.e., reactive organic gases [ROG], nitrogen oxides [NO<sub>x</sub>], and particulate matter [PM<sub>10</sub>]). The project's cumulative contribution to regional air quality will be discussed, based in part on the modeling conducted at the project level. The project's cumulative contribution to regional air quality will be discussed, based in part on the modeling conducted at the project-level. The analysis will also address any potential odor impacts that may occur, as well as toxic air contaminant (TAC) emissions.

The GHG emissions analysis will include a quantitative estimate of carbon dioxide equivalent emissions from the proposed project, including indirect emissions (e.g., electricity, propane) and construction emissions. The chapter will include an analysis of the project's consistency with the City of Wheatland Climate Action Plan (CAP).

The significance of air quality and GHG impacts will be determined in comparison to FRAQMD significance thresholds. FRAQMD-recommended mitigation measures will be incorporated, if needed, to reduce any significant air quality impacts, and anticipated reductions in emissions associated with proposed mitigation measures will be quantified.

## **Noise**

The Noise chapter of the EIR will be based on a project-specific Noise Study. The chapter will address potential noise impacts resulting from project construction and operation, including existing and future traffic noise levels on the local roadway network. Noise-sensitive land uses or activities in the project vicinity will be identified and ambient noise and vibration level measurements on, and in the vicinity of, the project site will be conducted to quantify existing background noise and vibration levels for comparison to the predicted project-generated levels. Operational noise levels will also be evaluated. Noise exposure levels will then be compared to applicable significance criteria in the City of Wheatland General Plan Noise Element, the City's Noise Ordinance, and CEQA. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

## **Transportation**

The Transportation chapter of the EIR will be based on a Traffic Impact Study prepared specifically for the proposed project. Impact determination for CEQA purposes will be based on vehicle miles traveled (VMT), consistent with CEQA Guidelines Section 15064.3, which became effective statewide on July 1, 2020. The VMT analysis will be quantitative in nature and will be prepared consistent with the City of Wheatland's current guidance regarding analysis of VMT.

The proposed project's impacts to alternative modes such as pedestrian, bicycle, and transit facilities, will be assessed based on significance criteria contained in the adopted City guidelines. The EIR chapter will also include an analysis of the project's potential impacts

related to conflicting with applicable programs, policies, and ordinances addressing the circulation system, vehicle safety hazards, and emergency access. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

### **Tribal Cultural Resources**

The Tribal Cultural Resources chapter of the EIR will be based on a Cultural Resources Inventory and Evaluation Report prepared specifically for the proposed project, as well as input from Native American tribes as a result of consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18, the latter of which is required for the proposed project due to the proposed General Plan Amendment. The chapter will describe the potential effects to tribal cultural resources from buildout of the proposed project. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

### **Utilities and Service Systems**

The Utilities and Service Systems chapter will evaluate the project's impacts related to water supply, wastewater, stormwater drainage, and solid waste infrastructure and facilities. In addition, the chapter will evaluate the project's impacts related to dry utilities, such as electric power, natural gas, and telecommunications facilities.

### **Other Effects**

All remaining CEQA Guidelines Appendix G Checklist topics will be addressed in the Other Effects chapter of the EIR. Accordingly, the Other Effects chapter of the EIR will address Aesthetics, Agricultural and Forestry Resources, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

## **DISCUSSION OF CUMULATIVE IMPACTS**

In accordance with Section 15130 of the CEQA Guidelines, an analysis of cumulative impacts associated with the proposed project will be undertaken and discussed. In addition, pursuant to Section 21100(B)(5) of the CEQA Guidelines, the cumulative analysis will address the potential for growth-inducing impacts associated with the proposed project and will focus on whether or not implementation of the proposed project would remove any existing impediments to growth.

## **DISCUSSION OF ALTERNATIVES**

In accordance with Section 15126.6(a) of the CEQA Guidelines, several project alternatives, including the No Project Alternative, will be analyzed. For the proposed project EIR, the Alternatives section will evaluate at a minimum three alternatives: the No Project Alternative and two other alternatives, which will be determined during the preparation of the EIR.

The alternatives analysis will "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 analysis will include sufficient

information about each alternative to allow meaningful evaluation of, and comparison with, the proposed project. The significant effects of the alternatives will be discussed, but in less detail than the significant effects of the proposed project. The discussion will also identify and analyze the “environmentally superior alternative.”