

# U.S. Army Corps of Engineers – Westbrook Project EIS

# TECHNICAL MEMORANDUM: ALTERNATIVES DEVELOPMENT AND SCREENING JUNE 28, 2012

This memorandum summarizes National Environmental Policy Act (NEPA) alternatives development and screening for the U.S. Army Corps of Engineers (USACE) Westbrook Project EIS.

#### 1.0 PURPOSE AND NEED OF THE PROPOSED ACTION

# 1.1 Background

In June 2011, Westpark Associates (the Applicant) submitted their draft purpose and need statement to the USACE for the Westbrook project. The stated purpose was "to implement a moderate-scale mixed-use, mixed-density master planned community within or contiguous to the City of Roseville, Placer County, California." According to the Applicant, the project is needed "to help satisfy the City of Roseville's share of the foreseeable regional housing demand and to accommodate commercial and office development in the Roseville area based on the Sacramento Area Council of Government's projections that the region will add approximately 871,000 people by 2035."

## 1.2 Project Purpose

According to the USACE,

[t]he project purpose is to implement a moderate-scale, mixed-use, mixed-density master planned community within or contiguous to the City of Roseville.

## 1.3 Project Need

The applicant's stated need for the project is as follows.

To help meet the City's foreseeable regional housing demand and to accommodate commercial and office development in the Roseville area based on Sacramento Area Council of Government's projections that the region will add approximately 871,000 million people by 2035.

#### 2.0 DEVELOPMENT OF EIS ALTERNATIVES

An EIS must consider a reasonable range of feasible alternatives to accomplish the purpose of the agency's action. Once a range of alternatives has been identified, a set of screening criteria may be used to "screen" the alternatives and narrow the range of alternatives to be carried forward for EIS analysis.

To establish the range of alternatives for this EIS analysis, the USACE first developed the project's purpose and need statement. Next, the USACE identified a broad range of potential alternatives that would achieve the project purpose. Finally, the USACE evaluated the potential alternatives against screening criteria based on the aspects of feasibility identified under NEPA—technical, economic, and environmental—to focus consideration on alternatives that meet NEPA stipulations for feasibility. In order to integrate this analysis with the Section 404(b)(1) alternatives analysis, screening criteria that were used in the analysis were also based on the practicability criteria under Section 404(b)(1) – technology, logistics, and cost. This approach ensures a site is screened out only if it is both infeasible under NEPA and impracticable under Section 404(b)(1), and a potential least environmentally damaging practicable alternative (LEDPA) is not eliminated from further analysis for reasons exclusive to NEPA.

The USACE action currently under analysis is the decision whether or not to issue a Section 404 permit to fill approximately 10 acres of jurisdictional waters of the United States in conjunction with the development of the proposed master planned community at the project site. Potential alternatives include a range of alternate development options using all or part of the same site. In addition, based on the project purpose, alternatives development also identifies other sites in or contiguous to the City of Roseville where such a project could reasonably be developed. For purposes of locating alternative sites, the USACE defined "contiguous" as meaning "within 1 mile of the City of Roseville's Sphere of Influence."

The following sections present a summary overview of the No Action Alternative, followed by the Proposed Action (Applicant's project as proposed), a discussion of on- and off-site alternatives development and screening steps, and a list of the alternatives proposed to be carried forward for analysis in the EIS.

# 2.1 Proposed Action (Applicant's Proposed Project)

The Westbrook project is a proposal to develop a moderate-scale, mixed-use, mixed-density master planned community on an approximately 400-acre site located in the northwestern portion of the City of Roseville (City). The project site is flanked to the east and the north by the West Roseville

Specific Plan area, where development is currently under construction to the east of the project, and to the south by the Sierra Vista Specific Plan site, where development has been approved by the City but the federal permit process is not yet complete. To the west of the site is undeveloped land, some of which lies within the Regional University and Community Specific Plan area and some of which lies within the Curry Creek Community Plan area.

The project site, formerly known as the Richland property, was previously part of the Sierra Vista Specific Plan. In August 2008, the previous owner withdrew from the Sierra Vista Specific Plan, which was subsequently approved by the City of Roseville in May 2010 with the Richland property treated as Urban Reserve. USACE has proceeded with processing an EIS for the Sierra Vista Specific Plan without the Richland property included as part of the Proposed Action. The Richland property was subsequently acquired by Westpark Associates and they are proceeding with the specific plan preparation and approval process for the property, now known as the Westbrook project.

The Proposed Action would entail development of about 361 acres of the 397-acre project site with a mix of land uses, including approximately 257 acres of residential uses, for a total of 2,029 residential units at buildout; approximately 43 acres of commercial uses; approximately 11 acres of school and other public uses; 36 acres of open space; 16 acres of parks; and 46 acres of roads. **Figure 1** presents the proposed land use plan. Development of the master planned community envisioned under the Westbrook project would be a long-term undertaking; construction is expected to begin in 2013 and, depending on market conditions, would be completed by about 2035.

## 2.2 On-Site Alternatives

# 2.2.1 Overview of On-Site Alternatives Development

The following paragraphs describe the range of on-site alternatives identified to date. These include four on-site action or "build" alternatives and one alternative entailing no action by the USACE.

#### No Action Alternative

Under the No Action Alternative, the project site would be developed in a manner that avoids activities in jurisdictional waters of the United States, including wetlands, thereby avoiding the need for USACE approvals under Section 404 of the Clean Water Act. Local approvals may still be required. The No Action Alternative may require authorization from the U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act because of the potential for take of federally listed species.

The No Action Alternative would involve development of portions of the approximately 397-acre site, resulting in a reduced extent of residential and commercial uses. Avoidance of Section 404 triggers would reduce the total development footprint to 275 acres, comprising 177 acres of residential uses (1,505 residential units at buildout), 30 acres of commercial and office uses, a 12 acres of school and other public uses, 14 acres of parks, and 44 acres of roads. About 122 acres would be preserved as open space. With the exception of Mountain Glen Drive, which would be curved to minimize open space crossings, roadway layout would be substantially similar to the Proposed Action. **Figure 2** presents the proposed land use plan for the No Action Alternative.

## Reduced Footprint/Increased Density Alternative

This alternative would also develop the 397-acre project site but would reduce the footprint of development within the site by increasing the acreage designated as open space, with the additional open space focused in areas that contain the greatest concentrations of sensitive habitat (vernal pools and/or drainages). The additional open space would be concentrated in the central portion of the site, east of La Sierra Drive and west of Westbrook Boulevard, and the eastern portion of the site, north of Mountain Glen Drive and west of Sierra Trail Drive. Under this alternative, total acreage to be developed would be reduced to 267 acres, compared to 361 acres under the Proposed Action, and open space would increase to 130 acres, compared to 36 acres under the Proposed Action. The residential development footprint would decrease to 153 acres, versus 245 acres under the Proposed Action. However, residential densities would increase to accommodate a similar number of residential units (1,890 residential units under this alternative, compared to 2,029 units under the Proposed Action). Acreage designated for commercial uses would be reduced slightly under this alternative and the acreage for public uses would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 3** presents the proposed land use plan for this alternative.

#### Reduced Footprint/Same Density Alternative

The Reduced Footprint/Same Density Alternative would have the same reduced development footprint as the Reduced Footprint/Increased Density Alternative described above, but would develop residential areas at the same densities as the Proposed Action. As a result, this alternative would provide 1,405 residential units, compared to 2,029 units under the Proposed Action. Acreage designated for commercial uses would be reduced slightly under this alternative by comparison with the Proposed Action and the acreage for public uses would remain the same. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 4** presents the proposed land use plan for this alternative.

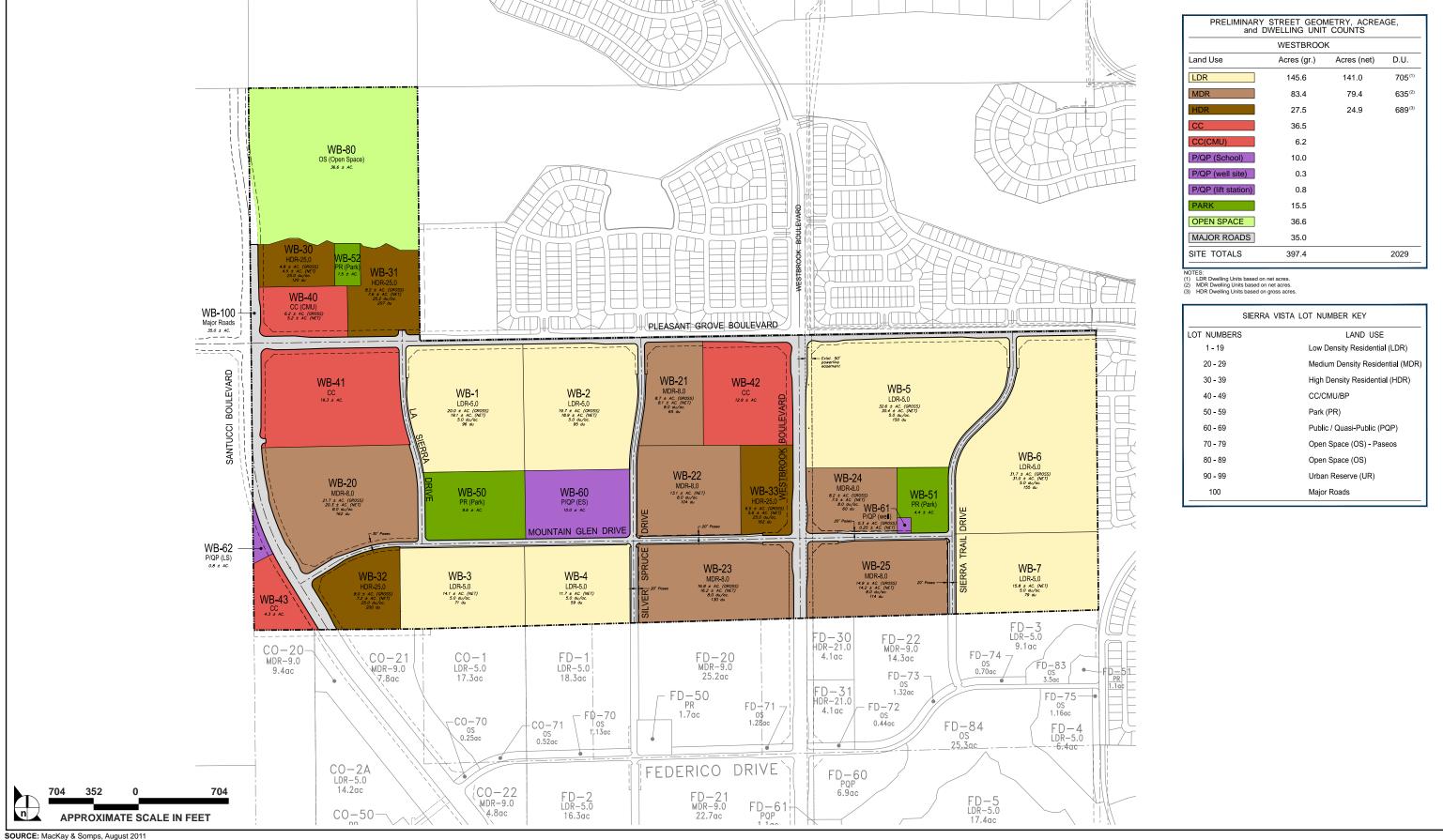


FIGURE I



FIGURE 2

No Action Alternative





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FIGURE 4

#### **Central Preserve Alternative**

This alternative would reduce the footprint of development within the site by concentrating additional open space in a contiguous area that runs roughly north-south through the center of the site. Under this alternative, total acreage to be developed would be reduced 25 percent to 271 acres, compared to 361 acres under the Proposed Action, and open space would increase to 126 acres, compared to 36 acres under the Proposed Action. The residential development footprint would decrease to 162 acres, versus 245 acres under the Proposed Action. As residential densities would remain similar to the Proposed Action, the total number of residential units under this alternative would be about 1,415. Acreage designated for commercial and school uses would be similar to the Proposed Action under this alternative. The location of roadways and commercial land uses would be largely similar to the Proposed Action, with Mountain Glen Drive and Sierra Trail Drive somewhat more curved to avoid open space areas. **Figure 5** presents the proposed land use plan for this alternative.

#### One Acre Fill Alternative

Under the One Acre Fill Alternative, areas on the project site containing wetland resources would be preserved as open space such that no more than 1 acre of jurisdictional wetlands would be filled to build the land development under this alternative. This would reduce the development footprint to about 236 acres, compared to 361 acres under the Proposed Action. The proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total residential development would be reduced to 1,340 dwelling units, compared to 2,029 units under the Proposed Action. Land designated for commercial uses would be about 23 acres compared to 43 acres under the Proposed Action. Institutional land uses would be largely the same as under the Proposed Action. School acreage would remain the same as under the Proposed Action. Open space acreage would increase from about 36 acres under the Proposed Action to about 161 acres under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the locations of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. Figure 6 presents the proposed land use plan for this alternative.

#### Half Acre Fill Alternative

Under the Half Acre Fill Alternative, areas on the project site containing wetland resources would be preserved as open space such that no more than 0.5 acre of jurisdictional wetlands would be filled to build the land development under this alternative. This would reduce the development footprint to about 223 acres, compared to 361 acres under the Proposed Action. As with the One Acre Fill Alternative above, the proposed residential densities under this alternative are greater than the densities included in the Proposed Action. However, due to the reduced footprint of development, the total number of residential units would be reduced to 1,256 dwelling units, compared to 2,029 units under the Proposed Action. Land designated for commercial uses would be about 19 acres compared to 43 acres under the Proposed Action. Acreage for school uses would be largely the same as under the Proposed Action. Open space acreage would increase from about 36 acres under the Proposed Action to about 174 acres under this alternative. The alignments of Mountain Glen Drive, Silver Spruce Drive, and Sierra Trail Drive would be substantially different from the locations of these roadways under the Proposed Action. This alternative would also include a bridge along a portion of Silver Spruce Drive. Figure 7 presents the proposed land use plan for this alternative.

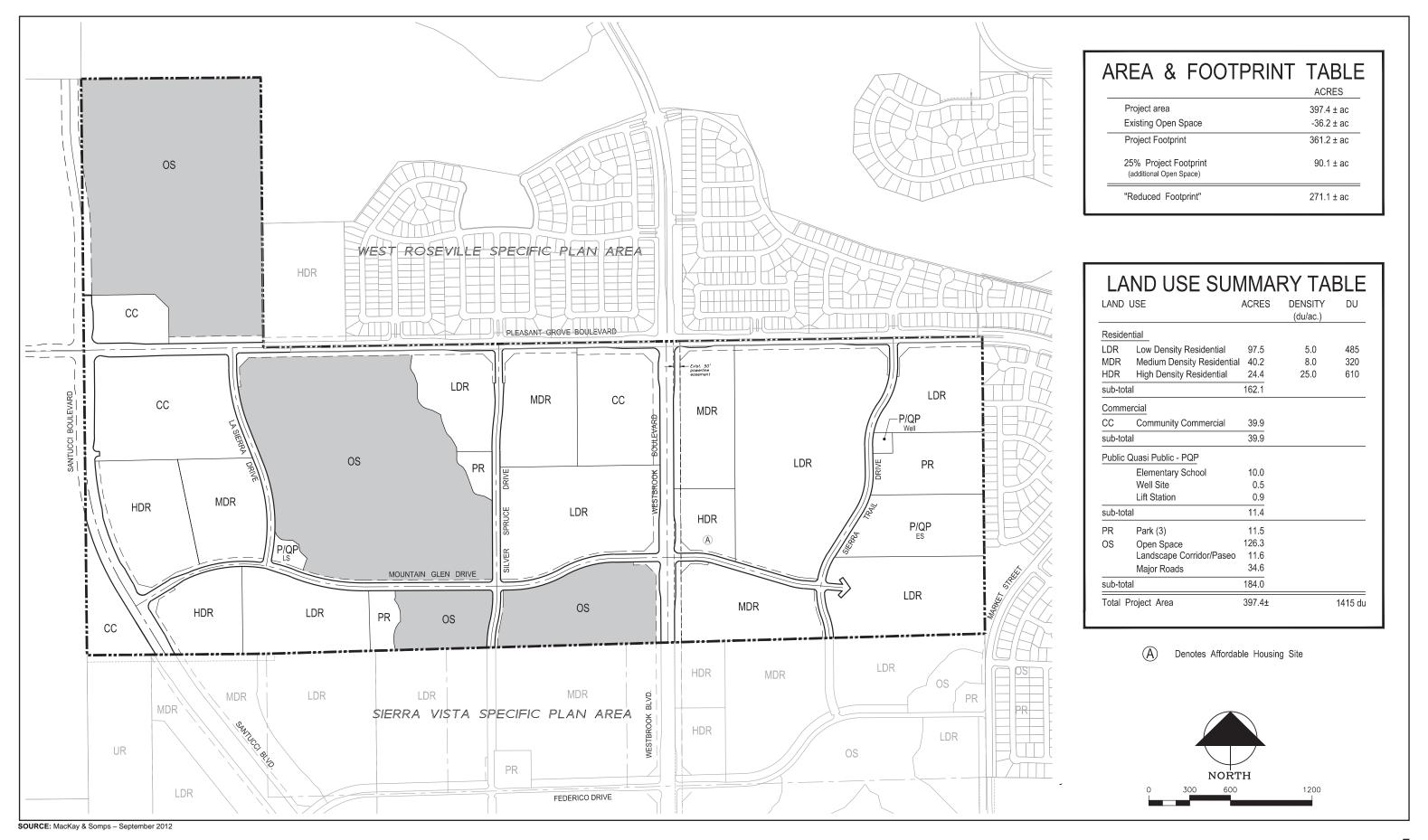
## 2.3 Off-Site Alternatives

## 2.3.1 Definition of Study Area for Off-Site Alternatives

As noted above, the project purpose is to implement a moderate-scale, mixed-use, mixed-density master planned community within or contiguous to the City of Roseville. Based on the project purpose, the USACE defined the geographic area for alternate sites to include all lands that are within the City of Roseville or within 1 mile of the City's Sphere of Influence (SOI) boundary (the City's SOI is coterminous with the City limits except in the areas around the Creekview Specific Plan area and Amoruso Ranch).

## 2.3.2 Identification of Potential Alternative Sites

Within this area, as a first step, all areas that are not yet developed but have an active DA permit application with the USACE were excluded from consideration. Therefore, three areas (the Creekview Specific Plan, Sierra Vista Specific Plan, and the Placer Vineyards Specific Plan areas) were excluded.



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FIGURE 5





The next task was to identify areas offering an amount of contiguous undeveloped land, appropriate to support development of a moderate-scale, mixed-use community. The City has a General Plan policy (Policy LH-6) that requires large development projects to be developed pursuant to a Specific Plan. While there is no minimum size for Specific Plan areas considered by the City, the City generally treats infill sites less than 100 acres and greenfield sites less than 300 acres to be individual development projects rather than Specific Plan projects. Because the Proposed Action would be developed pursuant to a Specific Plan, the USACE had determined that the minimum size of an alternative greenfield or infill site to develop the Proposed Action is 220 acres. This minimum size is also consistent with the Half Acre Fill Alternative, which is the On-Site Alternative with the smallest development footprint (223 acres).

Based on review of the current General Plan for the City of Roseville, together with information on existing development proposals in western Placer County, seven sites within 1 mile of the City's SOI were identified for further screening. The sites are shown on **Figure 8**, **Potential Off-Site Alternatives**, and are briefly described below.

#### **Placer Ranch Site**

The Placer Ranch Specific Plan (SP) area comprises a 2,250-acre site in unincorporated Placer County, north of Roseville. The 2,250-acre site has previously been proposed for development of residential, business park, light industrial uses, office, and commercial uses and a 300-acre branch campus for the California State University, Sacramento. The Placer Ranch SP project was originally proposed in the County. In 2007, a development application was submitted to the City of Roseville, but the project has been on hold since early 2008. The project is not approved at this time.

The central portion of the SP area is within the County-defined Western Regional Landfill buffer area, within which development is restricted to non-residential uses. There is a 329-acre contiguous area in the southeast corner of the Placer Ranch SP area that is outside of the 1-mile landfill buffer and within 1 mile of the City's SOI. This is potentially a suitable alternative site for the Proposed Action (see **Figure 8**).

#### **Amoruso Ranch Site**

The 674-acre Amoruso Ranch SP area is located on the south side of West Sunset Boulevard approximately 1.5 miles west of Fiddyment Road. The Creekview SP area is located to the south

Pease, personal communication, October 5, 2011.

and Reason Farms is located to the west of the Amoruso Ranch SP area. The site is located in unincorporated Placer County, but is within the City's SOI (see **Figure 8**).

A development application for the Amoruso Ranch SP was submitted to the City in May 2011. The proposed land use plan includes 2,785 residential units, 56 acres of commercial uses, a 7-acre elementary school site, six neighborhood parks, and a 6.9-acre fire station/public facilities site. Approximately 140 acres of the site would be set aside as open space preserve. The project is not approved at this time.

#### Reason Farms Panhandle Site

In May 2003, the City of Roseville approved the acquisition of two parcels of land, the Reason Farms and Warnick properties, totaling approximately 1,700 acres along Pleasant Grove Creek. This property was acquired for the purpose of constructing storm water retention basins, but would also provide open space and recreation opportunities for the City of Roseville. Development of the retention basins is currently in the design process.

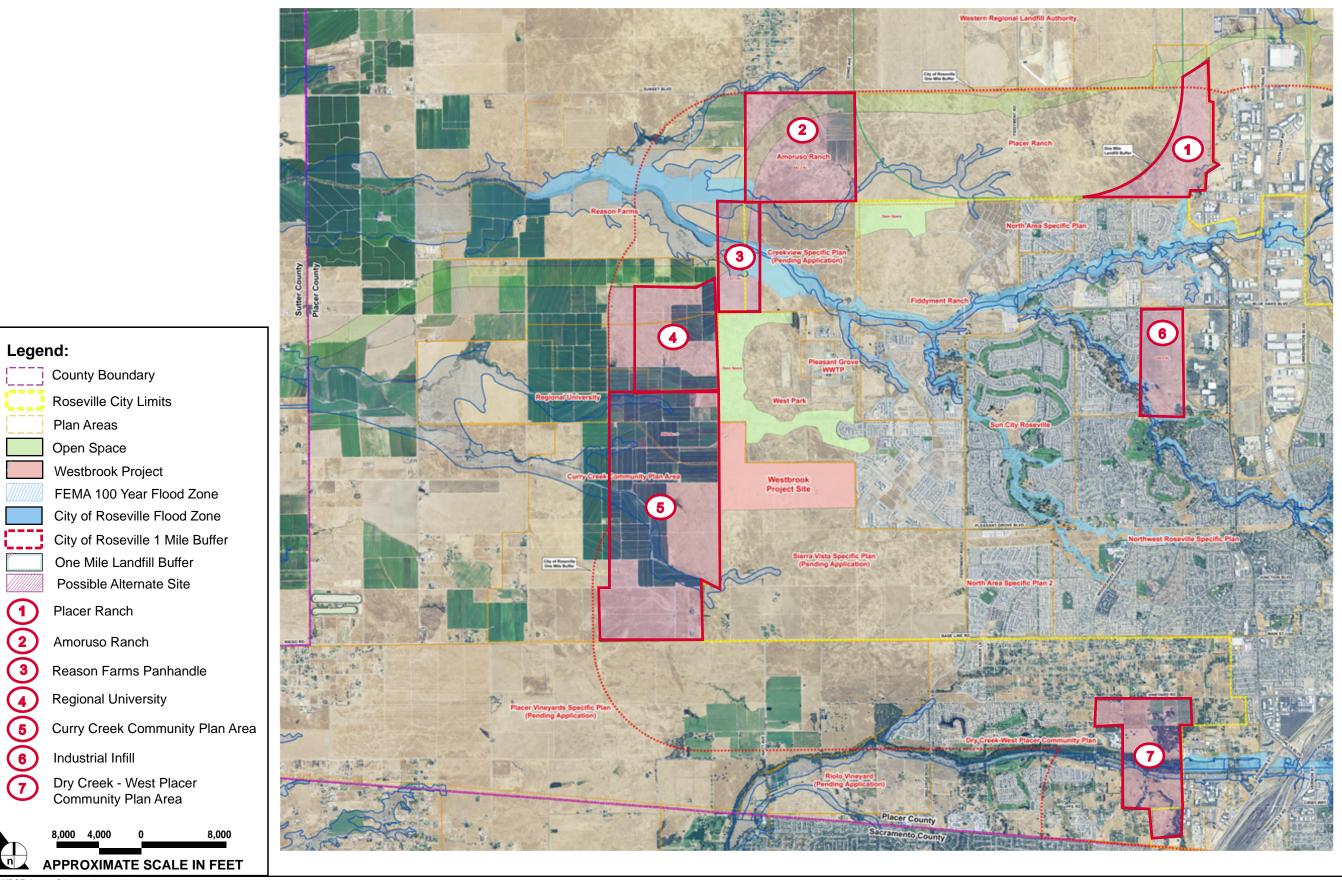
The "panhandle" is a 234-acre area at the southeastern corner of the Reason Farms property located northwest of the West Roseville Specific Plan area (see **Figure 8**). This area is potentially a suitable alternative site for the Proposed Action because the City does not plan to use this area for storm water detention facilities.

#### **Regional University Site**

The Placer County Board of Supervisors considered the proposed Regional University SP in 2008. The Regional University SP comprises approximately 1,158 acres and is located south of Pleasant Grove Creek between Brewer Road and the western boundary of the City of Roseville, approximately 1.6 miles north of Baseline Road.

The eastern portion of the Regional University SP area is within 1 mile of the City's SOI. Although an alternative site could be located anywhere within the 1 mile zone, for purposes of analysis, a 400-acre site immediately adjacent to the West Roseville SP area was selected as a potentially suitable alternative site for the Proposed Action (see **Figure 8**) as this site would be close to the westerly edge of development within the West Roseville SP area and easily accessible via a short extension of Blue Oaks Boulevard.

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SOURCE: Impact Sciences, Inc. – 2011

FIGURE 8

#### **Curry Creek Site**

The Curry Creek CP Area comprises approximately 2,113 acres bounded by the proposed Regional University and Community SP Area to the north, Baseline Road to the south, the proposed Westbrook area to the east, and undeveloped land to the west. The County Board of Supervisors directed staff to proceed with studying the area for future development in 2003, but at this time there is no specific plan or formal development application for the site.

The eastern half of the Curry Creek CP area is within 1 mile of the City's SOI. As an alternative site could be located anywhere within the 1-mile zone, for purposes of analysis the entire eastern half of the Curry Creek CP area (approximately 1,000 acres as shown on **Figure 8**) was evaluated to determine if any portion of the area could be selected as a potentially suitable alternative site for the Proposed Action.

#### **Industrial Infill Site**

The 240-acre Industrial Infill site is located on the south side of Blue Oaks Boulevard to the west of the Hewlett Packard campus (see **Figure 8**). The City processed a specific plan for the site in 2005-2006, but the applicant withdrew the application prior to approval in 2007. At this time there is no specific plan or formal development application for the site.

## **Dry Creek – West Placer Site**

The Dry Creek – West Placer CP area is located to the southeast of the proposed Westbrook project site, south of Baseline Road and east of the Riolo Vineyard SP area. The County approved the CP in 1990, and the plan was subsequently revised in 2007 as part of the Placer Vineyards project approvals. The CP area contains areas of suburban development as well as numerous rural residences.

An approximately 450-acre site within the CP area south of Vineyard Road is currently undeveloped and is potentially a suitable alternative site for the Proposed Action (see **Figure 8**).

# 2.3.3 Off-Site Alternatives Screening

Screening of off-site alternatives was completed in two phases. In the first phase, the seven potential sites identified above were evaluated under the following two criteria. For each criterion, sites were evaluated as **Feasible**, **Conditionally Feasible**, or **Not Feasible**. Sites that received a Not Feasible rating for any criterion were eliminated from further consideration.

- Criterion 1 Biological Resources Sensitivity
- Criterion 2 Preliminary Assessment of Availability for Development

Sites that remained in consideration following the first screening phase were then evaluated in a second phase using a third criterion, which was rated on a binary basis (**Feasible** or **Not Feasible**):

• Criterion 3 – Feasibility of Acquiring Sufficient Acreage

The following sections describe the two screening phases and the criteria in detail, and the results of the analysis.

## **Phase 1 Screening Criteria and Results**

The Phase 1 screening criteria for off-site alternatives were defined as follows.

- Criterion 1 Biological Resources Sensitivity evaluated the nature, extent, and quality of biological resources on the sites, with a particular focus on aquatic resources and special-status species. Sites with extensive, high-quality aquatic resources were rated as Not Feasible for this criterion unless those resources are already protected by conservation easements or other land use management mechanisms. Sites with substantial resources were rated as Conditionally Feasible. Sites with less extensive or more highly fragmented resources, and/or resources of lower quality, were rated as Feasible. Because detailed information (e.g., specific acreage of various sensitive habitat types) was not equally available for all of the potential alternate sites, evaluation under Criterion 1 was conducted in a generalized, qualitative manner, based on site reconnaissance and a reconnaissance-based evaluation of relative sensitivity (expressed as a rank, with the most sensitive site ranked "1" and the least sensitive site ranked "7").
- Criterion 2 Preliminary Assessment of Availability for Development evaluated the status of other potentially competing development proposals for the site, since a site could be physically suitable to support an off-site alternative but not available in practice due to prior or pending approval of another project. Sites without prior development proposals, and sites with a prior proposal that has been formally withdrawn, were rated as Feasible under this criterion. To ensure that the outcomes of this criterion were not unreasonably exclusive, sites with prior development proposals that are currently on hold but have not been withdrawn were rated as Conditionally Feasible, and only sites with active development proposals were rated as Not Feasible.

**Table 1** shows the evaluation of the seven potential sites under Criteria 1 and 2.

Table 1
Phase 1 Screening of Alternate Sites

Site	Screening Criteria				
Name and Size	Criterion 1 Biological Resources Sensitivity	Criterion 2 Preliminary Assessment of Availability			
Placer Ranch Site 329 acres	The site is primarily annual grassland. It is mostly in a fallow state and contains a major drainageway in the eastern portion. Vernal pools/seasonal wetlands are sparsely scattered throughout the site and are of moderate quality. Listed crustaceans are possible. The site is considered conditionally feasible because the resources on this site are generally similar to the Proposed Action.  Conclusion: Conditionally Feasible, Rank: 4	A development application for this site was submitted to the City of Roseville in 2007, but the project has not been approved, and the application is currently on hold.  Conclusion: Conditionally Feasible			
Amoruso Ranch Site 674 acres	This site is primarily fallow grassland with a large area of irrigated pasture along the eastern boundary. Two large wetland areas are present: a swale/vernal pool system in the northwest quadrant, and a seasonal wetland/vernal pool complex along the southern boundary. The vernal pool component is of relatively high quality because the property has not been highly modified in the past. The entire site is within the fairy shrimp Core Recovery Area.  Conclusion: Conditionally Feasible, Rank: 1	A development application for this site was submitted to the City of Roseville in May 2011. The applicant is also in early consultation with USACE but has not yet applied for a 404 permit.  Conclusion: Not Feasible			
Reason Farms Panhandle Site 234 acres	The property was formerly contour rice but in recent years has been farmed in a dryland crop. The property is bisected by Pleasant Grove Creek, a major regional creek. Pleasant Grove Creek is a deeply incised channel that flows year round and supports a narrow riparian corridor primarily contained within the channel. Live oak and valley oak define the top of bank. There are very few wetlands outside of the creek channel and the site contains no vernal pools.	The proposed retention basins are not planned for development within the "panhandle" portion of the property, making it potentially available for development.  Conclusion: Feasible			
	Conclusion: Conditionally Feasible, Rank: 6				
Regional University Site 400 acres	The site is about half active rice and half annual grassland. The grassland areas support relatively few wetlands. Some of the seasonal wetlands in the grassland are adjacent to the rice fields which leak into them during the dry months. The site has low potential to support listed crustaceans.  Conclusion: Conditionally Feasible, Rank: 5	The County approved the specific plan for this area in 2008. There have been no development proposals to date for this site.  Conclusion: Feasible			
Curry Creek Site About 1,000 acres	The site is primarily a fallow field, the majority of which was formerly in contour rice. A portion of the site is actively farmed in rice and the northeast section is a noncontour rice fallow field. The contour rice area contains numerous seasonal wetlands and vernal pools. It appears that greater than 5 percent of the fallow contour rice is wetland of relatively high quality. The fallow northern area is sparse with wetlands. Listed crustaceans are probable. This alternative is highly constrained by wetlands over the majority of the site.  Conclusion: Conditionally Feasible, Rank: 2	Although the County Board of Supervisors has previously directed staff to study this area for development, there is no specific plan and there have been no development proposals for this site to date.  Conclusion: Feasible			

Site	Screening Criteria			
Name and Size	Criterion 1 Biological Resources Sensitivity	Criterion 2 Preliminary Assessment of Availability		
Industrial Infill Site 240 acres	This site is primarily an open field except for the southwestern area, which supports an oak and vernal pool preserve. The site is regularly disked and supports very few vernal pools outside of the preserve. The wetland that are present are small, highly disturbed and of low quality. Conclusion: Feasible, Rank: 7	The development application submitted for this site was withdrawn in 2007. There are no specific plans or other development proposals for this site at this time.  Conclusion: Feasible		
Dry Creek– West Placer Site 450 acres	This site is located in a mostly developed area. It contains several tracts of pastureland that support a sparse vernal pool/seasonal wetland component. Listed crustaceans are possible. Trees and variable land uses are abundant. Dry Creek bisects the middle of the site. The site would be feasible because aquatic resources at this site are sparser than at the Proposed Action site.  Conclusion: Feasible, Rank: 3	The County approved the community plan in 1990, and the plan was revised in 2007 as part of the Placer Vineyards project approvals.  There have been no development proposals to date for this site.  Conclusion: Feasible		

**Table 2**, below, summarizes the results of the evaluation in **Table 1**. In **Table 2**, **F** represents a rating of Feasible, **C** represents a rating of Conditionally Feasible, and **N** represents a rating of Not Feasible.

Table 2
Summary of Phase 1 Screening Evaluation of Alternate Sites

	Screening Criteria		
Site	1	2	Outcome
Placer Ranch	С	С	Retained
Amoruso Ranch	С	N	Eliminated
Reason Farms Panhandle	С	F	Retained
Regional University	С	F	Retained
Curry Creek	С	F	Retained
Industrial Infill	F	F	Retained
Dry Creek-West Placer	F	С	Retained

## Phase 2 Screening Criteria and Results

The following six sites were carried forward for Phase 2 screening.

- Placer Ranch Site
- Reason Farms Panhandle Site
- Regional University Site
- Curry Creek Site
- Industrial Infill Site
- Dry Creek-West Placer Site

These sites were screened further using Criterion 3 which was defined as follows.

• Criterion 3 – Feasibility of Acquiring Sufficient Acreage evaluated the feasibility of acquiring title to the property through purchase, land exchange, or another mechanism. This was explored by the applicant through direct landowner inquiries and independently verified by the USACE. Sites where sufficient contiguous acreage (>220 acres, the minimum size to accommodate a project like Westbrook) could not be acquired by the applicant were eliminated from further consideration.

#### Feasibility of Acquiring Sufficient Acreage

Relative to Criterion 3, primary landowners of the Reason Farms Panhandle, Regional University, Curry Creek, and Industrial Infill sites indicated that the properties are not available for sale at this time.

Two owners of parcels totaling 261 acres within the Dry Creek-West Placer site indicated that they have no interest in selling their land at this time; as a result there is not enough available acreage for this to be a viable alternative site.

As a response was not received after several attempts to contact the primary landowner of the Placer Ranch site, it is being assumed for the purposes of this analysis that the site is potentially available for purchase.<sup>2</sup> This site was carried forward for analysis as the Off-Site Alternative as shown in **Figure 9**.

**Table 3** summarizes the results of screening based on Criterion 3.

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<sup>&</sup>lt;sup>2</sup> Jeff Jones, Westpark Associates. E-mails to James Robb, USACE, and Shabnam Barati, Impact Sciences, February 14 and April 13, 2012.

Table 3
Summary of Phase 2 Screening Evaluation of Alternate Sites

Site	Criterion 5 – Available for purchase	Outcome
Placer Ranch	Yes	Retained
Reason Farms Panhandle	No	Eliminated
Regional University	No	Eliminated
Curry Creek	No	Eliminated
Industrial Infill	No	Eliminated
Dry Creek-West Placer	No	Eliminated

## 3.0 CONCLUSION

Based on the screening process presented in this document, in addition to the Proposed Action, the following alternatives are planned to be carried forward for EIS analysis.

- No Action
- Reduced Footprint/Increased Density
- Reduced Footprint/Same Density
- Central Preserve
- One Acre Fill
- Half Acre Fill
- Off-Site: Placer Ranch Site

