

# 5: ALTERNATIVES TO THE PROJECT

## 5.0 Introduction

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### 5.0.1 CEQA REQUIREMENTS

Section 15126.6 of CEQA requires that an EIR describe a range of reasonable alternatives to the project that would feasibly attain the basic project objectives and avoid or substantially lessen any significant effects of the project. Alternatives may be eliminated from detailed analysis in the EIR if they fail to meet the most basic of project objectives, are determined to be infeasible, or cannot be demonstrated to avoid or lessen significant environmental impacts.

### 5.0.2 PROJECT OBJECTIVE AND PURPOSE

The City of Lone Wastewater Master Plan (Master Plan) is intended to meet the following objectives:

- 1) Meet the current and future wastewater treatment and disposal needs of the City of Lone;
- 2) Comply with the Cease and Desist order issued by the Regional Water Quality Control Board (RWQCB);
- 3) Expand the City's use of reclaimed water;
- 4) Upgrade wastewater treatment and disposal systems
- 5) Increase wastewater system operating efficiencies; and
- 6) Protect the environment through the development of a modern wastewater treatment and disposal system, and through the application of secondary and tertiary treatment technology.

The City of Lone is currently near or at capacity for the treatment and disposal of wastewater, and an expansion of capacity would be necessary in order to accommodate future planned growth and wastewater flows during extremely wet winters.

The purpose and need for the Master Plan is to identify the activities and guidelines for meeting the City's near term and long term wastewater treatment and disposal needs. An objective of the

Master Plan is to ensure that all effluent is treated to a tertiary level prior to disposal. The need for the project is to ensure safe and reliable wastewater treatment for the community.

In addition, the RWQCB issued a Cease and Desist Order (number 5-2003-0108) to the City of Lone on July 11, 2003. An objective of the proposed project is to comply with requirements for remedial action specified in the Cease and Desist Order, and to ensure that the treatment and disposal of wastewater is performed in an effective manner.

## **5.1 Alternatives Considered but Rejected**

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### **5.1.1 OVERVIEW**

Section 15126.6(c) of the CEQA Guidelines permits the elimination of an alternative from detailed consideration due to:

- Failure to meet most of the basic project objectives
- Infeasibility
- Inability to avoid significant environmental impacts

Section 15126(f)(1) of the CEQA Guidelines states that “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire control or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives.”

The City of Lone began exploring options to meet its wastewater treatment and disposal goals with the preparation of an earlier version of the City of Lone Wastewater Treatment Plant Master Plan in November 2004. This older version of the Master Plan outlined a different preferred project than the one currently under consideration, and began the process of considering a variety of alternatives to meet the City’s goals and objectives.

The City of Lone has worked during the past four years to examine a wide array of wastewater treatment and disposal options. The City has also been in active communication with other local and regional agencies – such as the Amador Water Agency (AWA), Amador County, Amador Regional Sanitation Authority (ARSA), the Mule Creek State Prison, and the cities of Sutter Creek and Jackson – to discuss regional solutions to wastewater treatment and disposal, and to ensure that the City of Lone’s proposed project does not conflict with the wastewater treatment and disposal systems of other agencies.

As a result of the City of Lone’s planning and interagency discussions, a number of alternative project scenarios were explored and ultimately rejected based on criteria including feasibility, environmental impacts, and ability to meet the City’s multiple goals. The proposed project analyzed in this EIR is the alternative that fulfilled the City’s goals and objectives while also being both feasible and having a minimum of environmental concerns. The alternatives that were considered but rejected from further analysis are discussed below.

### **5.1.2 RELOCATE WWTP FACILITIES TO ANOTHER LOCATION**

One alternative considered was the relocation of the City of Lone’s WWTP facilities to another location. This alternative has the potential to achieve the project objective of complying with the RWQCB Cease and Desist Order by relocating any percolation pond facilities farther away from

Sutter Creek. This alternative also has the potential to achieve the project objective of meeting the City's current and future wastewater treatment and disposal needs.

This alternative, however, has a number of flaws that make it unsuitable for further analysis. The alternative's first shortcoming is that there are no alternative locations that are both owned by the City and are suitable for WWTP facilities. The locations of the existing secondary and tertiary WWTPs, as well as the locations of the proposed Ponds 8 and 9, are all on lands that are owned by the City of Lone. The only other locations of significant size that are owned by the City of Lone are the Castle Oaks Golf Course and Charles Howard Park. Both of these locations are currently used as recreational facilities, and therefore would not be suitable for use as an alternate location for the WWTP facilities. No other locations are available in or around the City of Lone that are both readily available to the City and suitable for the relocated WWTP facilities.

The second problem with this alternative is that the construction of WWTP facilities on another site would likely result in greater construction impacts than construction of the proposed project. The proposed project would be largely located on previously disturbed lands that are already being used for the treatment and disposal of wastewater. The only exceptions are the locations for Ponds 8 and 9, which are on lands that have been previously disturbed but are otherwise undeveloped. The proposed project minimizes many construction impacts by utilizing existing facilities as much as possible, including most of Ponds 5 and 6, all of Pond 7, and the existing tertiary WWTP facilities. Any alternative location for the WWTP facilities would likely be undeveloped land, which would result in the need for larger scale construction activities to both replace the existing WWTP facilities and expand these facilities to meet the City's future needs. The larger scope of construction for relocated WWTP facilities could result in greater impacts to air quality and noise, land use compatibility issues, and more earth moving and excavation activities. An undeveloped site would also be more likely to result in impacts to sensitive species and wetlands.

The third problem with this alternative is that it would be significantly more expensive than the proposed project. The proposed project would reduce project costs by maintaining some of the existing facilities. The City's existing wastewater collection system is also designed to collect wastewater and send it to the existing secondary WWTP facility for treatment. A new location would require the reconfiguring of the City's wastewater collection system, and would result in a greater outlay in costs to construct an entirely new WWTP system.

Due to these three issues – lack of a suitable location, increased environmental impacts of construction, and increased costs of construction – this alternative was rejected from further consideration in this EIR.

### **5.1.3 EXPAND EXISTING FACILITIES ALTERNATIVE**

Another alternative considered but rejected from further review was the expansion of the City's existing treatment and percolation pond network, and the elimination of the use of new technologies such as the proposed activated sludge treatment system. This alternative would involve the replacement and repair of the City's existing secondary WWTP system (much of which is either aging or already in disrepair), and the construction of new treatment ponds and new percolation ponds to augment the existing pond system.

This alternative is unlikely to meet any of the project objectives. Even with full utilization of the lands owned by the City, the new treatment and percolation ponds would not be large enough to accommodate the City's future wastewater treatment and disposal needs. The continued use of Ponds 1, 4, 5, and 6 in their current form would also not comply with the RWQCB's Cease and Desist Order unless those ponds were at least partially filled or lined, in which case the resulting

reduction in treatment and disposal capacity would move this alternative farther away from meeting the City's capacity goals.

The continued use of older wastewater treatment technologies would also not meet the project objective of developing a modern wastewater treatment and disposal system to more efficiently and effectively deal with the City's wastewater needs.

This alternative was rejected from further consideration in this EIR due to its inability to adequately meet the project objectives.

## **5.2 Considered Alternatives**

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Three alternatives to the proposed project, including the No Project Alternative, are considered in this EIR and described below. No other viable alternatives have been identified for this project. The reasons for the limited alternative considerations include:

- The City of Lone is legally required to come into compliance with the RWQCB's Cease and Desist Order, and there are limited options available for compliance.
- The Master Plan was designed and developed concurrently with the environmental analysis in order to reduce and minimize environmental effects.

The Master Plan was designed as a comprehensive tool to guide the modification and expansion of the WWTP facilities and considers all viable methods of meeting the City's goals and objectives.

### **5.2.1 NO PROJECT ALTERNATIVE**

Section 15126.6(e) of the CEQA Guidelines requires consideration of the environmental consequences if the project is not constructed. The No Project Alternative would result in the continued operation and maintenance of the existing WWTP facilities only, and would not result in any construction or any increase in the City's wastewater treatment and disposal capacity. The No Project Alternative also would not bring the WWTP facilities into compliance with the RWQCB's Cease and Desist Order, as it would not result in any changes to the existing ponds bordering Sutter Creek.

The No Project Alternative would avoid any direct impacts associated with the proposed project, and therefore would avoid the potentially significant and mitigable environmental impacts identified in Section 3: Environmental Impact Analyses. However, the No Project Alternative would also not meet any of the project objectives of meeting the City's current and future wastewater treatment needs with an efficient and modern wastewater treatment system, or complying with the RWQCB's Cease and Desist Order or future waste discharge requirements. The No Project Alternative would result in the City's wastewater treatment needs exceeding existing treatment capacity by the year 2011.

### **5.2.2 STREAM DISCHARGE ALTERNATIVE**

The City of Lone has explored the option of implementing a seasonal creek discharge into Sutter Creek in conjunction with the existing and expanded land disposal system. This option would involve the use of either the City's existing tertiary WWTP or new tertiary treatment facilities to treat the City's municipal wastewater to a tertiary level, and thereby allow for the seasonal discharge of tertiary treated wastewater directly into Sutter Creek. The existing tertiary WWTP is currently unused and dormant during the wet months of the year, and this option would allow for the year-round use of the existing tertiary facilities. The stream discharge option would also require a number of improvements to the existing treatment facilities or the construction of a new tertiary treatment facility, including an expansion and upgrade of the existing secondary treatment system

(most likely involving the conversion to an activated sludge system) and the construction of an outfall system to discharge the treated wastewater into Sutter Creek. The stream discharge alternative would avoid the need for percolation ponds, and in fact could result in the elimination of the entire existing pond network.

The greatest drawback to this alternative is the feasibility of obtaining the necessary National Pollutant Discharge Elimination System (NPDES) permit from the Central Valley RWQCB. These permits are extremely difficult to obtain and may require that the wastewater be treated to a level above and beyond normal tertiary treatment. Further, Sutter Creek is often dry or nearly dry during certain times of the year, and discharge during the dry season could result in receiving waters that are unduly dominated by reclaimed wastewater.

### **5.2.3 REDUCED CAPACITY ALTERNATIVE**

Another possible alternative is the reduction in the ultimate capacity of the project for wastewater treatment and disposal. The specifics of this alternative could vary depending on the capacity goal, and would result in a treatment and disposal capacity somewhere between the current capacity of 0.55 MGD and the proposed project's capacity of 1.60 MGD of treatment and 0.90 MGD of disposal.

This alternative would require at a minimum the partial lining or filling of Ponds 1, 4, 5, and 6 in order to comply with the RWQCB's Cease and Desist Order. The loss of treatment and disposal capacity in any of these ponds would result in the need to replace that capacity, likely with the construction of an activated sludge system somewhere on the secondary WWTP site to provide increased treatment capacity, and the construction of Pond 8 to provide increased disposal capacity.

The reduced capacity alternative would likely meet the City's near term needs for wastewater treatment and disposal. This alternative, however, would fail to fully meet the project objective of providing wastewater treatment and disposal capacity to meet the City's long term needs. The City of Lone would be forced to cap development once the new WWTP capacity is reached, which would halt the growth and expansion of the City.

## **5.3 Environmentally Superior Alternative**

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Section 15126.6(e)(2) of the CEQA Guidelines stipulates that "If the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the alternatives."

The No Project alternative would maintain the existing WWTP facilities in the City of Lone, and would avoid the construction-related environmental impacts of the proposed project as defined in Section 3: Environmental Impact Analyses. The No Project Alternative would also result in the continued violation of the RWQCB's Cease and Desist Order, as well as exceeding the City's wastewater treatment capacity by the year 2011. The continued lack of compliance with the Cease and Desist Order and other future waste discharge requirements would likely result in fines from the RWQCB. The exceedance of the City's wastewater treatment capacity would result in either a cap on all development in the City of Lone, or an overburdening of the City's WWTP facilities that could result in disposal of incompletely treated wastewater and/or an overflow of the system's capacity. Any improper disposal of wastewater, either through a spill or incomplete treatment, would pose a health risk to the environment.

The reduced project alternative would meet the City's project objectives to a lesser degree than the proposed project, as it would not fully meet the City's long term needs for wastewater treatment and disposal. The reduced project alternative, however, would also have a reduced

impact on the environment, as this alternative would result in less construction and fewer changes to the existing WWTP system. Though all of the proposed project's impacts could be mitigated to less-than-significant levels with implementation of the mitigation measures outlined in this EIR, the level of the potential impacts of the reduced project alternative would remain less than those of the proposed project. The reduced project alternative would therefore be the environmentally superior alternative. The reduced project alternative, however, would not fully meet the City's long term wastewater disposal needs.