

SECTION 4: ALTERNATIVES ANALYSIS

4.1 - Factors Used in Selection of Alternatives

4.1.1 - Development of Alternatives and Screening Process

One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the impacts of a proposed project. In addition to mandating consideration of the No Project Alternative, the CEQA Guidelines (Section 15126.6[d]) emphasize the selection of a range of reasonable alternatives and an adequate assessment of these alternatives to allow for a comparative analysis for consideration by decision-makers.

CEQA requires consideration of a range of reasonable alternatives to the project or project location that: (1) could feasibly attain most of the basic project objectives; and (2) would avoid or substantially lessen any of the significant impacts of the proposed project. An alternative cannot be eliminated simply because it is more costly or if it could impede the attainment of all project objectives to some degree. However, the CEQA Guidelines declare that an EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote or speculative. CEQA requires that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

This screening analysis does not focus on relative economic factors of the alternatives (as long as they are feasible) since the CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may “impede to some degree the attainment of project objectives or would be more costly.” Likewise, the question of market demand or project need is not considered.

4.1.2 - Alternatives Screening Methodology

Alternatives to the proposed project were selected based on the input from the project applicant, the Lead Agency, and the public and local jurisdictions during the EIR scoping hearings. The alternatives screening process consisted of three steps:

Step 1: Define the alternatives to allow comparative evaluation.

Step 2: Evaluate each alternative in consideration of one or more of the following criteria:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the project.
- The extent to which the alternative would avoid or lessen one or more of the identified significant environmental effects of the project.

- The potential feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, General Plan consistency, and consistency with other applicable plans and regulatory limitations.
- The requirement of the CEQA Guidelines to consider a “no project” alternative and to identify, under specific criteria, an “environmentally superior” alternative in addition to the “no project” alternative (CEQA Guidelines, section 15126.6[e]).

Step 3: Determine suitability of the proposed alternative for full analysis in the EIR. If the alternative is unsuitable, eliminate it, with appropriate justification, from further consideration.

Feasible alternatives that did not clearly offer the potential to reduce significant environmental impacts and infeasible alternatives were removed from further analysis. In the final phase of the screening process, the environmental advantages and disadvantages of the remaining alternatives were carefully weighed regarding potential for overall environmental advantage, technical feasibility, and consistency with project and public objectives.

If an alternative clearly does not provide any environmental advantages as compared to the proposed project, it is eliminated from further consideration. At the screening stage, it is not possible to evaluate potential impacts of the alternatives or the proposed project with absolute certainty. However, it is possible to identify elements of the proposed project that are likely to be the sources of impact. A preliminary assessment of potential significant effects of the proposed project resulted in identification of the following impacts:

- Division of an established community;
- Disruption of current levels of services; and
- Creation of logical boundaries.

4.1.3 - Summary of Screening Results

Potential alternatives were developed and reviewed in the context of the above-mentioned impacts. Given that LAFCo does not have direct authority to influence land use decisions, but rather, maintains authority over governmental boundaries and the provision of public services, alternatives evaluated in this EIR are generally limited to modified incorporation boundaries or changes in the provision of existing public services. Based on these factors, the range of alternatives evaluated in this EIR are generally within LAFCo’s authority and, therefore, are considered feasible. Those alternatives that were found to be technically feasible and consistent with the objectives of the proposed incorporation are identified and description in the following section.

Description of Alternatives Evaluated in EIR

No Project Alternative

Description

Under the No Project Alternative, the proposed incorporation of Arden Arcade would not occur. The proposed incorporation area would remain under County jurisdiction.

Alternate Boundary Alternative

Description

Alternative Boundary would entail a larger incorporation area than is currently proposed. This boundary modification would include portions of the Arden Arcade Community Plan area to the south of Fair Oaks Boulevard and north of the American River. The area included is illustrated in Exhibit 4-1. As shown, in addition to the inclusion of the remainder of the Arden Arcade Community Plan area, this alternative includes a small area immediately north of Winding Way and south of Arcade Creek. This Alternative Boundary alternative could also be used to establish a sphere of influence made up of all or a portion of the remainder of the Arden Arcade Community Plan area and the small area immediately north of Winding Way and south of Arcade Creek. This would allow the area to remain unincorporated and permit the area to be annexed at a later date pursuant to the provisions of Cortese-Knox-Hertzberg Reorganization Act of 2000.

Alternate Provision of Services Alternative

Description

The possibility of the proposed incorporation area utilizing Alternative Services Providers is a plausible alternative to the proposed project. Under this alternative, the City of Sacramento would provide fire, police, parks, water, wastewater, solid waste removal, planning, public works, animal control, street lighting, and street maintenance services to the new city. In the event of annexation to the City of Sacramento, the City would extend all of its services to the proposed incorporation area.

4.2 - Analysis of Impacts and Cumulative Effects of Project Alternatives

4.2.1 - No Project Alternative

Under the No Project Alternative, incorporation would not occur and a change in current service providers or level of service would not result. The proposed incorporation area is anticipated to continue to develop under the existing Sacramento County General plan and the Arden Arcade Community Plan. Land use designations are based on the 1988 City of Sacramento General Plan for the incorporated part of the area and the 1993 Sacramento County General Plan for the unincorporated area. The Sacramento County General plan establishes a broad policy framework that guides land use decisions in the unincorporated areas. The Arden Arcade Community Plan supplements the countywide general plan for the areas that it covers, and addresses land use, circulation, housing, public services, and other issues in much the same way as the general plan, although not to the same level of detail.

Urbanization of land in the proposed incorporation is anticipated to continue primarily through the development of vacant lands. The Sacramento County General Plan concludes that it is reasonable to expect that the complete urban development of the incorporation area would occur if adequate resources and services continue to be available. Pressure to develop vacant lands within the proposed incorporation area is anticipated under the Sacramento County General Plan. Impacts resulting from the No Project Alternative are as follows:

Air Quality

The No Project Alternative would have similar operational air quality impacts as the proposed project because both would have to develop consistent to the Sacramento County General Plan. In addition, because the proposed project would not create substantial air quality impacts from the construction of vacant land uses, construction-related air quality impacts associated with the project would also not be created under the No Project Alternative; therefore, the No Project Alternative would have similar, less than significant, impacts to Air Quality to the proposed project.

Biological Resources

The No Project Alternative impacts to Biological Resources would be similar to those of the proposed project.

Hazards and Hazardous Materials

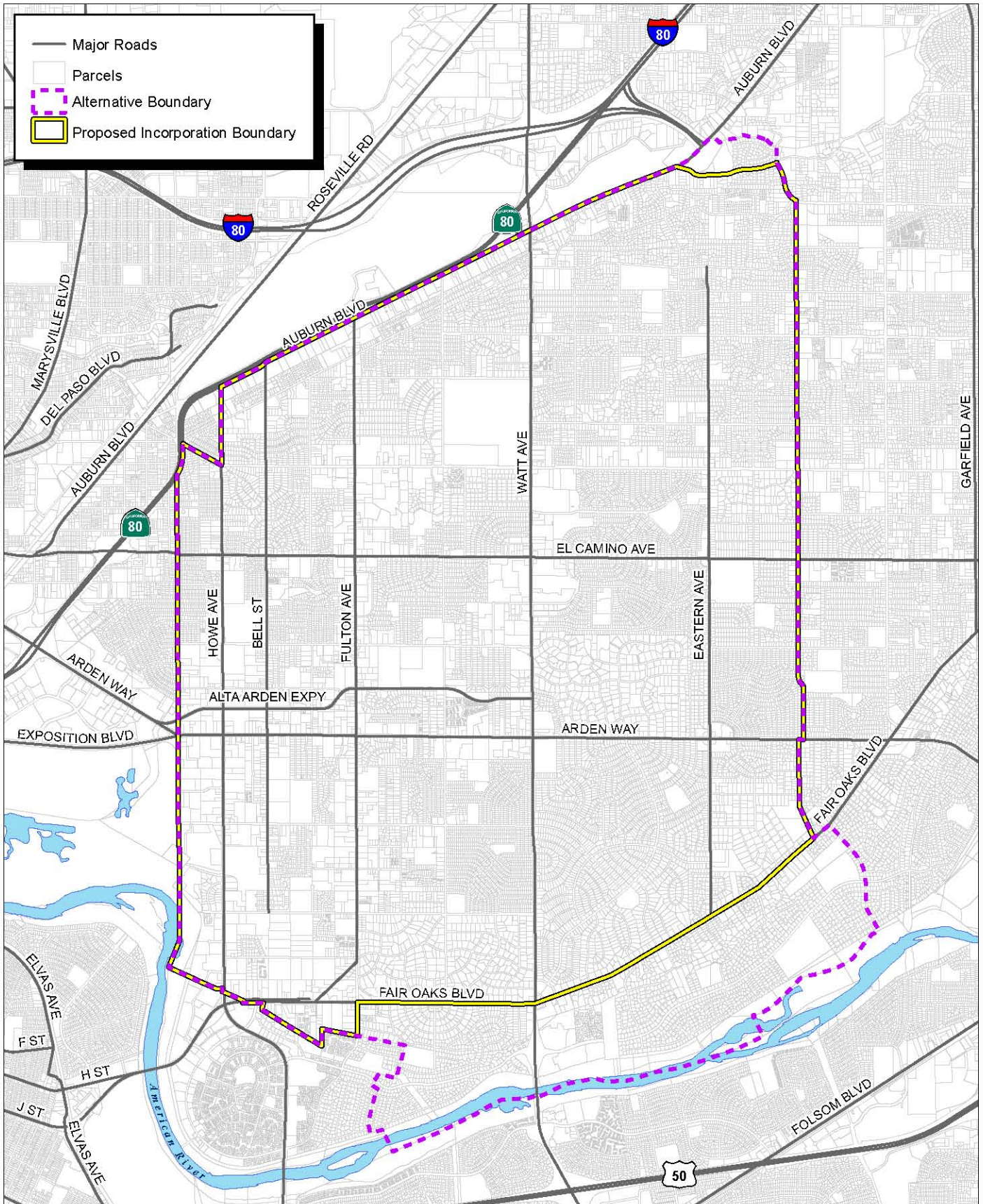
The No Project Alternative impacts to Hazards and Hazardous Materials would be similar to those of the proposed project.

Hydrology and Water Quality

Hydrology and water quality impacts under the No Project Alternative would be similar to those under the proposed project. The proposed incorporation area is currently covered with largely impervious surfaces and a small number of vacant lands. Therefore, the amount of surface runoff associated with No Project Alternative would be similar to the level of runoff associated with the proposed project. Similar to the proposed project, implementation of the No Project Alternative would require meeting any and all applicable regulations for storm water runoff, water quality, and flooding.

Land Use and Planning

The No Project Alternative would result in buildout of the proposed incorporation area under the existing General Plan and zoning designations. The proposed incorporation area is currently an urban area with developed commercial, retail, school, park, and residential uses as well as some vacant land. Under the No Project Alternative, the uses would presumably continue on the project site and the vacant land would be built out under the General Plan and Zoning Code.



Source: Sacramento County GIS (2009), SACOG (2009), MBA (2009).



Exhibit 4-1 Alternative Boundary

Implementation of the No Project Alternative would therefore result in no impacts to consistency with the General Plan and zoning designations; additionally, because the perimeters of the proposed incorporation area are primarily developed and surrounding uses are predominantly residential, impacts to surrounding uses would be minimal. Therefore, the No Project Alternative would have similar, less than significant, impacts to Land Use and Planning to the proposed project.

Noise

The No Project Alternative impacts to Noise would be similar to those of the proposed project.

Population and Housing

The No Project Alternative impacts to Population and Housing would be similar to those of the proposed project.

Public Services

The No Project Alternative would include development potential similar in nature to the proposed project. Similarly, this alternative would not generate an increased demand for public services beyond that anticipated in the Sacramento County General Plan.

Traffic and Transportation

The No Project Alternative would not cause a traffic increase in the proposed incorporation area and surrounding areas because homes, public facilities, retail businesses, and office uses would be constructed under the Sacramento County General Plan. The No Project Alternative would not have the substantial traffic or transportation related impacts resulting from build out of the vacant parcels in the proposed incorporation area; therefore, the No Project Alternative would have similar, less than significant, impacts to traffic and transportation to the proposed project.

Conclusion

Although much of the proposed incorporation area would be urbanized with or without the proposed project, several environmental effects identified for the proposed project would be avoided under the No Project Alternative. Neither the proposed project nor the No Project alternative would result in significant and unavoidable impacts. The No Project Alternative would substantially reduce and in most cases, eliminate all potential environmental effects associated with the proposed project.

4.2.2 - Alternate Boundary

An Alternate Boundary to the proposed project would entail a larger incorporation area than is currently proposed. This boundary modification would include portions of the area to the south of Fair Oaks Boulevard and north of the American River, and small area immediately north Winding Way and south of Arcade Creek. The area included is illustrated in Exhibit 4-1. The Alternative Boundary Alternative also includes the possibility of incorporating the proposed incorporation area, and establishing a sphere of influence made up of the remainder of the Arden Arcade Community Plan area and the small area immediately north of Winding Way and south of Arcade Creek.

The analysis of the Alternative Boundary Alternative necessarily includes an analysis of this alternative organization proposal, as it evaluates impacts in the same area, and would result in a lesser environmental impact. Because the sphere of influence area would continue to develop in accordance with the Sacramento County General Plan until such time as the sphere of influence could be annexed by the new city, any environmental impacts in that area would be less than if the same area were incorporated at this time. Furthermore, any future annexation of the sphere of influence area would require additional environmental documentation and analysis at that time.

The Alternate Boundary area includes approximately 2,095 lots, two vacant parcels of land, four additional parks, and three additional schools. Regardless of inclusion into the proposed incorporation of Arden Arcade, the Alternate Boundary Alternative would continue to develop in accordance with the Sacramento County General Plan. Impacts resulting from the Alternate Boundary Alternative are as follows:

Air Quality

The Alternate Boundary Alternative impacts to Air Quality would be similar to those of the proposed project.

Biological Resources

The Alternate Boundary Alternative would have similar impacts to Biological Resources to the proposed project. The species and biological resources analyzed under the project would have the same occurrence rates in the alterative boundary. There are no additional potentially impacted species or biological resources above that analyzed for the project.

Hazards and Hazardous Materials

The Alternate Boundary Alternative impacts to Hazards and Hazardous Materials would be similar to those under the proposed project.

Hydrology and Water Quality

Hydrology and water quality impacts under the Alternate Boundary Alternative would be similar to those under the proposed project. The proposed incorporation area is currently covered with largely impervious surfaces and a small number of vacant lands. Therefore, the amount of surface runoff associated with Alternate Boundary Alternative would be similar to the level of runoff associated with the proposed project and No Project Alternative. However, the predominate difference in the proposed project and the Alternate Boundary Alternative is the proximity of homes and development to the American River and potential flooding impact. Similar to the proposed project, implementation of the Alternate Boundary Alternative would require meeting any and all applicable regulations for storm water runoff, water quality, and flooding.

Land Use and Planning

The Alternate Boundary Alternative would result in buildout of the proposed incorporation area under the existing General Plan and zoning designations. The proposed incorporation area is currently an urban area with developed commercial, retail, school, park, and residential uses as well as some vacant land. Under the Alternate Boundary Alternative, the uses would presumably continue in the incorporation area and the vacant land would be built out under the General Plan and Zoning Code. Implementation of the Alternate Boundary Alternative would not result in impacts to consistency with the General Plan and zoning designations; additionally, the Alternate Boundary Alternative perimeters are developed and impacts to surrounding uses would be minimal. Therefore, the Alternate Boundary Alternative would have similar, less than significant, impacts to Land Use and Planning to the proposed project.

Noise

The Alternate Boundary Alternative impacts to Noise would be similar to those of the proposed project.

Population and Housing

The Alternate Boundary Alternative impacts to Population and Housing would be similar to those of the proposed project.

Public Services

The Alternate Boundary Alternative would include development potential similar in nature to the proposed project. Similarly, this alternative would not generate an increased demand for public services beyond that anticipated in the Sacramento County General Plan. However, the Alternate Boundary Alternative includes one additional elementary school, two additional high schools, and four additional parks. The inclusion of these additional facilities would not result in significant impacts to public services.

Traffic and Transportation

The Alternate Boundary Alternative would not cause a traffic increase in the proposed incorporation area and surrounding areas because homes, public facilities, retail businesses, and office uses would be constructed under the Sacramento County General Plan. Furthermore, the Alternate Boundary Alternative area is completely developed with the exception of two vacant parcels. The Alternate Boundary Alternative would not have the substantial traffic or transportation related impacts resulting from build out of the vacant parcels in the additional incorporation area; therefore, the Alternate Boundary Alternative would have similar, less than significant, impacts to traffic and transportation to the proposed project.

Conclusion

Although much of the additional area in the Alternate Boundary Alternative area would be urbanized with or without the proposed project, several environmental effects identified for the proposed project

would also be impacted with the Alternate Boundary Alternative. Neither the proposed project nor the Alternative Boundary would result in significant and unavoidable impacts.

4.2.3 - Alternate Provision of Services Alternative

The possibility of the proposed incorporation area utilizing Alternative Services Providers is a plausible alternative to the proposed project. Under this alternative, the City of Sacramento would provide fire, police, parks, water, wastewater, solid waste removal, planning, public works, animal control, street lighting, and street maintenance services to the new city. In the event of annexation to the City of Sacramento, the City would extend all of its services to the proposed incorporation area.

Air Quality

The Alternate Provision of Services Alternative impacts to Air Quality would be similar to those of the proposed project.

Biological Resources

The Alternate Provision of Services Alternative impacts to Biological Resources would be similar to those of the proposed project.

Hazards and Hazardous Materials

The Alternate Provision of Services Alternative impacts to Hazards and Hazardous Materials would be similar to those of the proposed project.

Hydrology and Water Quality

The Alternate Provision of Services Alternative impacts to Hydrology and Water Quality would be similar to those of the proposed project.

Land Use and Planning

In the event of annexation to the City of Sacramento, the City would extend all of its services to the proposed incorporation area. Such services as Planning and Public Works would be provided by the City of Sacramento and the previously established City of Sacramento General Plan and Zoning Code. This potential transfer of land use authority to the City of Sacramento would not fulfill the project's objectives as outlined in the project description. In addition, this alternative would result in inconsistency with the Sacramento County General Plan, resulting in a significant and unavoidable impact.

Noise

The Alternate Provision of Services Alternative would have similar impacts to Noise to the proposed project; however, the threshold that would be used for future project development would be the City of Sacramento's Exterior and Interior Noise Standards.

Population and Housing

The Alternate Provision of Services Alternative would have similar impacts to Population and Housing to the proposed project.

Public Services

The Alternate Provision of Services Alternative would require the City of Sacramento to provide all services to the proposed incorporation area. The City of Sacramento lies adjacent to the western boundary of the proposed incorporation area. Sacramento is a full service city that provides fire, police, parks, water, wastewater, solid waste removal, planning, public works, animal control, street lighting, and street maintenance services. Services provided by the County could be assumed by the City of Sacramento; however, services provided by the special district could be problematic.

In the event of annexation to the City of Sacramento, the City would extend all of its services to the annexation area/incorporation area. There exist the potential for duplicate parks and water services in the Arden Arcade area. The City of Sacramento already provides water services and parks and recreation services, and the City would most likely extend those services to any area that it annexes. Therefore, LAFCo would have to determine the service provider for those services, should that occur within the project area. That situation would be contrary to LAFCo's mandate, which in *City of Ceres vs. City of Modesto* (Fifth District: 274 Cal App. 2d545.1 July 1969) states that LAFCo is the "watchdog of the legislature to guard against the wasteful duplication of services that result from indiscriminate formation of new local agencies or haphazard annexation of territory to existing local agencies."

In addition, it would split the Fulton El Camino Recreation and Park District, which would leave the district without much of its tax base and make it very difficult to maintain its facility to the west of Ethan Way. Similarly, the Mission Oaks Recreation and Park District would lose significant territory and control over its facilities west of Mission Avenue. Sacramento Suburban Water District was formed by consolidation of Northridge Water District and Arcade Water District. The annexation of the territory to the City of Sacramento would essentially reverse the consolidation, which would have a significant impact on the operations of the Sacramento Suburban Water District. Sacramento Metro Fire District would lose five stations and the property tax revenues from the Arden Arcade area that could adversely impact their ability to provide services. As far as law enforcement, the annexation would force a reorganization of the County Sheriff's Department since it would lose four of the six patrol areas of its North Central Division.

This alternative has the potential for significant impacts on the agencies that provide services to the Arden Arcade area. While residents of Arden Arcade would continue to receive services, residents of the affected special districts could see a reduced level of service.

Traffic and Transportation

The Alternate Provision of Services Alternative could potentially cause a traffic increase in the proposed incorporation area and surrounding areas because homes, public facilities, retail businesses, and office uses would be constructed under the City of Sacramento County General Plan, which has higher densities than the Sacramento County General Plan. Therefore, the Alternate Provision of Services Alternative would have more significant impacts to traffic and transportation than the proposed project.

Conclusion

This Alternate Provision of Services Alternative has the potential for significant impacts on the public services, land use and planning, and transportation and circulation in the Arden Arcade area

4.3 - Environmentally Superior Alternative

In order to assist the Lead Agency, an EIR typically identifies the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. In addition, section 15126(d)(2) of the CEQA Guidelines states that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Designating a superior alternative depends in large part on what environmental effects one considers most important. This EIR does not presume to make this determination; rather the determinations of which impacts are more important, is left to the reader and to the decision-makers. Finally, it should be noted that the environmental considerations are one portion of the factors that must be considered by the public and the decision makers in deliberations on the proposed project and the alternatives. Other factors of importance include possible boundaries, economics, social factors, and fiscal considerations.

For this project, the environmentally superior alternative would not result in development of the proposed incorporation area under the proposed project. Air Quality, Biological Resources, Hazards and Hazardous Material, Hydrology and Water Quality, Land Use, Noise, Population, Traffic and Transportation impacts would remain roughly equivalent under both the No Project Alternative and the proposed project because the proposed incorporation area would be built out under the current zoning designations for the vacant lands in the incorporation area. However, the proposed project could potentially result in additional environmental impacts to Public Services that would not be encountered under the No Project Alternative. Based on this analysis, the environmentally superior alternative is the No Project Alternative because none of the significant environmental impacts from the proposed project would occur; however, the No Project Alternative also would not achieve the project’s objectives.

If the No Project Alternative is the environmentally superior alternative, CEQA also requires an EIR to identify the environmental superior alternative in addition to the No Project Alternative. The proposed Project would be environmentally superior. The No Project Alternative would not meet all of the objectives of the project.

