4 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

The purpose of this chapter is to identify and describe the alternatives to the project. A summary of the comparative environmental effects of the project and the alternatives is provided in Chapter 8.

Project alternatives are intended to reduce or eliminate the potentially significant adverse environmental effects of the project while attempting to meet the project objectives. An EIR is required to contain a discussion of a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain the basic objectives of the project (State CEQA Guidelines Section 15126.6[a]). The comparative merits of the alternatives should also be presented. CEQA provides the following guidelines for considering alternatives to the project.

- The "no project" alternative shall be evaluated. If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (State CEQA Guidelines Section 15126.6[e]).

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of eliminating significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would partially impede the attainment of the proposed objectives, or would be more costly (State CEQA Guidelines Section 15126.6[b]).

- If an alternative would cause one or more significant environmental effects in addition to those that would be caused by the project, the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project (State CEQA Guideline Section 15126.6[d]).

- The range of alternatives required by an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. An EIR need not consider an alternative whose effect cannot be ascertained and whose implementation is remote and speculative (State CEQA Guidelines Section 15126.6[f]).

4.2 ALTERNATIVES EVALUATED IN THIS EIR

Several alternatives were considered at the outset of the EIR. As the environmental benefits of some of the alternatives became clear (e.g., reduced impacts to giant garter snake habitat, overflight easements), the applicant revised the project to reflect these benefits. This narrowed the number of alternatives available for consideration. Other alternatives were determined to be infeasible. Two alternatives were identified for evaluation in comparison to the project:

- **The No Project Alternative –** Continuation of Existing Land Uses (NP) assumes that existing conditions at the project site would remain.

- **The Reduced Size Alternative** – is designed to reduce the area of development on the project to reduce site specific environmental impacts including impact to biological resources, farmland, air quality, and transportation.

Each of these alternatives is described in more detail below.

4.2.1 NO PROJECT ALTERNATIVE (NP) – CONTINUATION OF EXISTING LAND USES

Under the No Project Alternative (NP), development would not occur and the project site would remain designated for agricultural use. Production of agricultural crops would continue at the project site and no new facilities would be constructed. The project site would not be annexed into the City of Sacramento; and it would remain in the unincorporated area of the County of Sacramento. The project site's current General Plan land use and zoning designations identified by the County of Sacramento would remain in effect. The Sacramento County General Plan designates the site for Agriculture, and it is zoned by the Sacramento County Zoning Code as Agricultural (Ag 80). The no project alternative would be consistent with the designated land uses for the project site but would not meet any of the project objectives.

4.2.2 DISPERSED DEVELOPMENT ALTERNATIVE

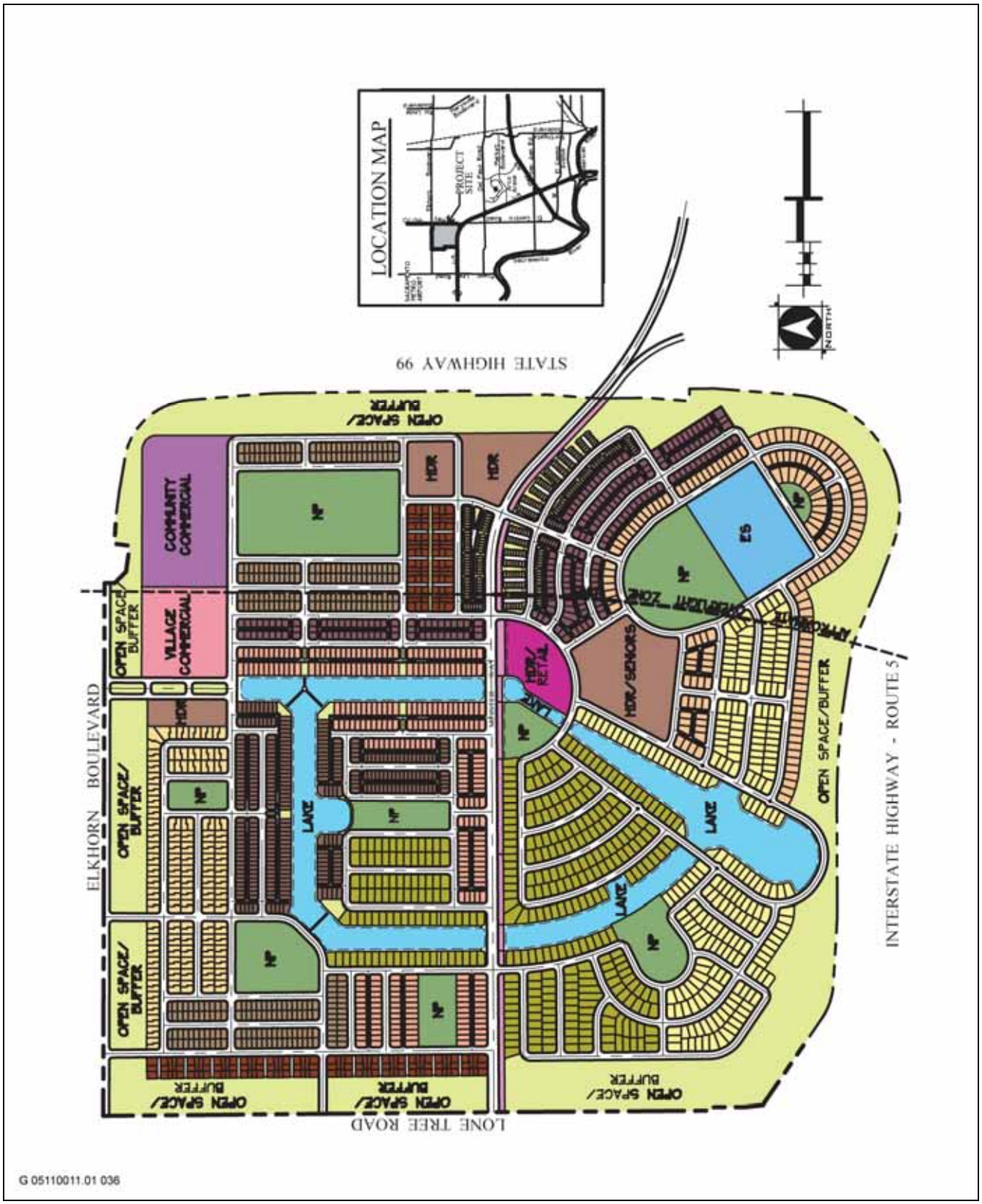
Among the findings to be considered in deliberations over the project, LAFCo will need to determine whether expansion of the City's SOI will be needed to provide adequate housing within its jurisdiction to meet projected housing demands. There are several properties designated for residential land uses within the City that are either undeveloped or under utilized such that they could be developed (or re-developed) with new residential land uses that could help the City meet its long-term housing demands. The purpose of this alternative is to consider whether existing properties within the City's SOI could support the project's proposed land uses, while at the same eliminating some of the project's significant and significant and unavoidable environmental impacts. Therefore, this alternative evaluates the comparative impacts of distributing the project's proposed housing units (i.e., 3,473) and commercial land uses (i.e., 155,000 square feet) in multiple locations on vacant or underdeveloped properties throughout the City's corporate limits and SOI boundary.

4.2.3 REDUCED SIZE ALTERNATIVE

The Reduced Size Alternative is designed to reduce the development footprint of the project to avoid one or more of the project's significant and unavoidable impacts. The project would result in significant impacts in the areas of conversion of prime farmland and open space, visual character of the project site, transportation impacts on local roadways and intersections, operational air emissions, and noise. This alternative would constrain development at the project site to a development level that may be financially infeasible to implement but would achieve most if not all of the project's objectives. Development of this alternative would be approximately 80% of proposed project levels (20% reduction in proposed development at the site). Therefore, this alternative would result in the development of 2,995 residential units and approximately 25 acres of commercial development. The remainder of the site would be undeveloped and would continue in its existing state. To reduce potential impacts to agricultural resources, sensitive biological species and habitats, and to minimize the development area that falls within the Sacramento International Airport's safety zone, development of this alternative would need to be concentrated in the eastern portion of the project site. However, mobile source air emissions and noise impacts from I-5 and SR 70/99 result in the need to locate sensitive receptors including the elementary school at a greater distance from these sources. Therefore, this alternative would need to be designed in such a way as to provided a buffer on the eastern and southern boundaries of the site. In general, this alternative would consist of a development project that would concentrate land uses in the north central portion of the site. An approximate 200–400 foot-wide buffer/open space/fallowed land area would be provided on the western, eastern, and southern boundaries of the project site (Exhibit 4-1).

4.3 ALTERNATIVES CONSIDERED AND INCORPORATED INTO THE PROJECT

During project initiation, some potentially significant environmental issues were raised during the initial scoping process for the DEIR. Other impacts were identified during preparation of the EIR, and they resulted in applicant-initiated changes to the proposed project. These potentially significant environmental issues involved potential



Source: Wood Rodgers 2005

Reduced Size Alternative **Exhibit 4-1**

impacts to giant garter snake habitat and wetland areas and noise compatibility impacts associated with aircraft operations at the Sacramento International Airport, which is located approximately 1 mile west of the project site. In initiating the preparation of the DEIR, two alternatives were considered and were to be evaluated in the DEIR at an equal level of detail as the project.

The first of these alternatives was labeled the "Reduced Impacts to Biological Resources Alternative." The intent of this alternative was to design the project in such a way as to protect and preserve important giant garter snake habitat located at the project site, primarily along Lone Tree Canal, by developing a 250-foot linear open space/buffer (from the center of Lone Tree Canal) along the western border of the site. In consideration of this design alternative, the project applicant subsequently decided to make this proposed buffer an element of the project, thereby eliminating the need to consider this alternative in the EIR. Therefore, the project, with the proposed 250-foot buffer, has been considered throughout Chapter 6, "Environmental Analysis," of this EIR and the resulting benefit associated with the proposed buffer was compared to baseline environmental conditions.

The second alternative that was to be considered in the EIR was labeled the "Noise Compatibility Alternative." The intent of this alternative was to develop land uses at the project site that would be less sensitive to aircraft overflight noise associated with private and military aircraft flights arriving and departing at the Sacramento International Airport. This alternative considered a development pattern at the project site that would concentrate non-residential land uses including employment center, manufacturing, research, and development, and light industrial land uses in the portion of the project site that falls within the airport safety zone and high-density residential, retail and medium density residential land uses in the eastern portion of the project site that falls outside the airport safety zone. Through the scoping process, the Sacramento County Airports System (SCAS) commented that the land uses proposed for the project site are generally compatible with land uses allowed under the Airport Land Use Plan. Further, nuisance-related complaints from single-event noise levels associated with aircraft overflights to proposed residents could be offset through the establishment of an overflight easement over the project site, which requires that new homeowners and tenants/renters be notified through their title documents/leases that aircraft operations occur approximately 1 mile west of the site and that occupants could be subjected to noise associated with aircraft overflights.

The project applicant has agreed to implement the avigation easement and title notification to residents as an element of the project. Because the project has been proposed as a predominantly residential development consistent with objectives for the project, and because of the large area that falls within the airport safety zone (i.e., ⅔ of the site), it would be infeasible for the project to re-design the plan in such a way that would continue to provide a predominantly residential community outside the airport safety zone. All feasible design and policy measures have been incorporated into the project, thereby eliminating the need to consider the alternative in the EIR.

4.4 OTHER ALTERNATIVES CONSIDERED AND REJECTED

CEQA requires that the lead agency identify any alternatives that were considered but rejected as infeasible during the scoping process, and briefly explain the reasons underlying the infeasibility determination (State CEQA Guidelines, Section 15126.6[c]). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts.

4.4.1 OFF-SITE ALTERNATIVE

In many EIRs, an off-site alternative is evaluated to provide a greater range of possible alternatives to consider in the decision-making process. The key question is whether an off-site alternative is available that would feasibly attain most of the basic objectives of the project, and would also avoid or substantially lessen any of the environmental effects of the project (CEQA Guidelines Section 15126.6[a]). The basic objectives of the Greenbriar project include creating a residential development located near downtown Sacramento and Metro Air

Park, as well as creating a single-family residential neighborhood that meets the growth principles established by the Sacramento Area Council of Government's (SACOG) Blueprint plan. The project is the most reasonable location to provide urban development that would support a light rail stop because it surrounds the proposed alignment for the Downtown-Natomas-Airport (DNA) light rail line. The North Natomas community is considered the most reasonable and feasible location for a potential off-site alternative because it is located within close proximity of the proposed DNA line and it is an area that supports new growth and development.

Development in the North Natomas area has occurred fairly rapidly since adoption of the NNCP in 1994 and of the properties that are currently designated for residential land uses, there is not a known site that could accommodate a development similar to the Greenbriar project (in size) that is not already being pursued for development by other property owners. Further, there are not sufficient properties available that when combined could provide sufficient area for the proposed land uses. Areas that are currently being actively pursued by other developers include the area to the south of the project site, the Panhandle area (in the eastern portion of North Natomas, north and south of Del Paso Road), the area just west of Natomas Crossing, and the area to the southeast of the junction of State Route 70/99 (SR 70/99) and Elkhorn Boulevard. These vacant properties are either currently under City review for development, or homebuilders (other than the Greenbriar property owner) are actively assembling land in anticipation of submitting a development application.

None of the undeveloped residential properties within the NNCP area are currently owned by the Greenbriar property owner. Although it may be possible for the applicant to acquire a property of a similar size or acquire an aggregate of properties that could accommodate the proposed land use within the North Natomas area, given the timing of the application and the status of development in the North Natomas area it is not reasonable to consider that the applicant would be successful in obtaining such a property and there is no site available that provides a key transit station. Further, while other property may be available outside the City limits, it would be more distant from the City and would "Leapfrog" undeveloped area, leading to undesirable land use patterns and substantial growth inducement potential. For these reasons, an off-site alternative would not be a feasible project for the applicant to implement and this alternative would create land use patterns that would be inconsistent with this vision of the City's general plan including extension of light rail service. This alternative has been rejected from further consideration.

4.4.2 BLUEPRINT ALTERNATIVE

The Sacramento Area Council of Governments (SACOG) adopted the Sacramento Region Blueprint Transportation and Land Use Study Preferred Blueprint Scenario (Blueprint) in December 2004. The Blueprint is a vision for long-term land uses within the Sacramento region, considering that substantial growth is projected within the region over the next 50 years. The Blueprint promotes compact, mixed use development, over the type of lower density, sprawling land uses that have been typical of the region in the past. The concern is that if development were to proceed along a similar pattern as in the past, it would result in the consumption of substantial open space, agricultural resources, and biological habitat, compared with more compact, land use and transportation-efficient land development. The Blueprint went so far as to suggest land uses (on a gross scale) for various lands within the region.

The Blueprint's preferred land use scenario identifies the Greenbriar site for high density mixed residential and single family small lot land uses. Existing development to the east across SR 70/99 is designated for single-family large lot and single-family small lot, and the area south of I-5 for single-family large lot, single-family small lot, public, and medium-density mixed-use center or corridor land uses. Undeveloped areas to the north are designated for medium-density and high-density mixed residential land uses with the area to the west designated for industrial land uses. The Blueprint's preferred land use scenario is to be used as a concept-level illustration of the Blueprint's growth principles, although it is not necessarily intended to be applied or implemented on a parcel level.

The Blueprint is guided by a series of smart growth principles. The following is a synopsis of these principles:

- Provide housing choice and diversity.

- Using existing assets by infilling or intensifying the use of underutilized parcels in urbanized areas.
- Create compact development.
- Incorporate public-use open space within development projects (over and above existing regulatory requirements).
- Design for quality to increase the attractiveness of living in a compact development.
- Provide mixed use developments, both vertical (mixed in one building) or horizontal (with a combination of uses in close proximity).
- Provide transportation choices to encourage people to walk, ride bicycles, ride the bus, ride light rail, take the train, or carpool.

The City of Sacramento has discretion to determine how it would implement the Blueprint's smart growth principles in its long-term planning. For areas considered the Urban Reserve (i.e., areas designated for future urban growth beyond a 20-year planning horizon), the City determined that future growth within the Natomas Area in accordance with SACOG's Blueprint smart growth principals could result in the development of up to approximately 44,400 housing units, approximately 4 million square feet of commercial space, and 14,600 jobs.

All of the Blueprint's principles have been applied in the design of the proposed project. The project incorporates diverse housing types (i.e., low density, medium density, high density residential), development would be compact (i.e., maximized use space by providing medium and high density residential land uses on more than half of the site), the area of public open space is greater than required by city regulations (project provides 48.4 acres versus City requirement of 48.2 acres), and mixed uses (i.e., residential and commercial land uses on one parcel) would be accommodated on the site. In addition, the project would provide a variety of transit opportunities including walking and bicycling, and by planning for a future light rail extension and station at the project site.

Because the proposed project incorporates all of the design principles of the Blueprint, a project alternative designed to meet development patterns envisioned in the Blueprint in an alternate pattern is not needed. Based upon the guidance provided by the CEQA Guidelines (Section 15126.6(f)), it was determined that an alternative in addition to the reduced size alternative need not be developed to demonstrate the potential environmental consequences of evaluating an alternative consistent with the Blueprint. For these reasons, it was determined that the analysis of the alternatives described in Section 4.2, "Alternatives Evaluated in this EIR," provides enough information to permit a reasoned choice between available alternatives and their comparative environmental impacts.

4.4.3 REDUCED TRAFFIC ALTERNATIVE

The reduced traffic alternative would constrain development at the project site to a level that would reduce the project's significant and unavoidable traffic impacts at study area intersections below the City's existing thresholds (e.g., level-of-service or delay) for these intersections. The project would result in significant and unavoidable impacts to the intersections of Elkhorn Boulevard/SR 70/99 northbound ramps, SR 70/99 southbound to I-5 southbound on-ramp, I-5 northbound to SR 70/99 northbound off-ramp, Meister Way and Metro Air Parkway, Meister Way and Lone Tree Road, and Elkhorn Boulevard and Project Streets 1, 2, and 3. These intersections will operate well over their design capacity with or without the project in most instances. No additional feasible mitigation is available to reduce impacts to these intersections because all feasible roadway improvements to these intersections were assumed or recommended as mitigation in the analysis. Even with these improvements, these intersections would continue to operate unacceptably under cumulative plus project conditions. Therefore, the only way to eliminate impacts to these intersections would be to reduce the level of development at the site such that the impact does not occur.

As described in Section 6.1, "Transportation and Circulation," these intersections would require that Elkhorn Boulevard and Meister Way be widened above and beyond what the City has planned for and intends to do or beyond the existing available right-of-way. Development at the project site would need to be constrained to a level under cumulative conditions that would not trigger the widening of these roadways. It has been determined that development at the project site would need to be constrained to 25% of its current development level (or a 75% reduction). A project constrained to this development size (i.e., 890 residential units and 7.5 acres of commercial development) would not achieve any of the project's objectives including creating a transit-oriented development (i.e., medium and high-density land uses) centered around a light rail station, developing a project consistent with the SACOG Blueprint, providing an elementary school (insufficient demand and funding), and would not meet the City's goals designed to meet SACOG's Blueprint growth principles. If development occurs but at a density substantially lower than the Blueprint considers, especially on larger project sites, such as Greenbriar, greater pressure would be exerted on other sites to accommodate future growth, thereby placing greater potential for conversion of more open space to urban uses. Further, because of infrastructure costs spread over too-few houses, a substantially lower density development would not be an economically feasible development. Because this alternative would not be feasible and would not meet the objectives of the project or the City, this alternative was rejected from further consideration.

4.4.4 REDUCED BIOLOGICAL RESOURCES ALTERNATIVE

The reduced biological resources alternative would re-organize/design on-site land uses to locate the lake/detention basin and other open space features (e.g., parks, linear open space/buffer) along the western edge of the project site adjacent to Lone Tree Canal. The purpose of the proposed changes would be to eliminate potential urban encroachment impacts on giant garter snake and its habitat. This alternative would provide a wider buffer between urban land uses and the habitat along Lone Tree Canal. As discussed in Section 6.12, "Biological Resources," the project's impacts to giant garter snake and its habitat would be reduced to a less-than-significant level through implementation of a recommended conservation strategy that would maintain a linear open space/buffer (i.e., 250-feet from the center of the canal) along Lone Tree Canal to allow snake passage and would preserve and enhance additional off-site lands in accordance with mitigation ratios established by the North Natomas Habitat Conservation Plan.

Development of this alternative would result in placement of the on-site lake/detention basin closer to the airport runways at the Sacramento International Airport, which could increase the potential hazards associated with aircraft bird strikes compared to the hazards associated with the project because the project could create a flyway for birds that is in closer proximity to the airport. Because no significant and unavoidable biological impacts would occur with the project (as this alternative was designed to reduce potential biological impacts) and this alternative could increase potential hazards associated with aircraft bird strikes, this alternative was rejected from further consideration.