

8 COMPARATIVE MERITS OF THE ALTERNATIVES

In accordance with Section 15126.6(a) of the State CEQA Guidelines, an EIR must discuss a range of reasonable alternatives to the project "... which would feasibly attain most of the basic objectives of the project ... and evaluate the comparative merits of the alternatives." The factors that can determine feasibility are site suitability, other plan or regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. The alternatives analysis must also include a comparative evaluation of the No Project Alternative (State CEQA Guidelines Section 15126.6[e]). Through comparison of the alternatives, the advantages and disadvantages of each alternative compared with the proposed project can be weighed. Chapter 4 provides a description of the alternatives that are analyzed in this EIR.

This chapter provides a comparative summary of potentially feasible alternatives considered in this EIR. Alternatives that were considered but rejected as infeasible and alternatives that were considered and resulted in changes to the project are discussed in Chapter 4, "Alternatives to the Proposed Project." Section 8.1 provides a comparative analysis of a Reduced Size Alternative, Section 8.2 provides a comparative analysis of a Dispersed Development Alternative, and Section 8.3 provides a comparative analysis of a No Project Alternative. Section 8.4 summarizes the environmental conclusions of the alternatives analysis and compares the project impacts for each resource area to impacts associated with the alternatives. Lastly, Section 8.5 identifies the environmentally superior alternative.

8.1 CONSIDERATION OF AN OFF-SITE ALTERNATIVE

The key question in consideration of an off-site alternative is whether a feasible 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 significant environmental effects of the project (State CEQA Guidelines Section 15126.6[a]). The basic objectives of the project include creating a residential development located near downtown Sacramento and Metro Air Park, as well as providing development and a light rail stop along the proposed Downtown-Natomas-Airport light rail line with densities that would support the feasibility of a light rail line. In addition, the project site is located immediately adjacent to (across SR 70/99 from) the North Natomas community and the project would be located within the NNCP through a boundary amendment. The project would be a special planning area and would implement its own planned unit development guidelines. Because the NNCP area provides the greatest area of available land for development within close proximity to downtown Sacramento, the Sacramento International Airport, and alternative transportation opportunities, the North Natomas community is considered the most reasonable and feasible location for a potential off-site alternative. Further, staff of the Sacramento Regional Transit District have expressed (during a LAFCo hearing) that the location of the project and its proposed land uses and densities "create an environment that transit supportive" and would be critical to ensuring the success of the Downtown–Natomas–Airport transit line (Scott 2005).

According to the City's General Plan, as of September 2005 there were approximately 14,000 acres of low and medium density parcels of vacant land available. However, this number is likely less than this total, because there continues to be urban development in the North Natomas area, where the majority of this land is concentrated. For example, projects considered in a cumulative context include the Westborough, Cambay West, Natomas Crossing, Natomas Town Center, Natomas Creek and Panhandle projects (Exhibit 6-1), each of which are in the North Natomas area. As this shows, the North Natomas area continues to be actively developed, and much of the land is tied up by other landowners interested in development. None of the undeveloped low or medium density residential or residential /mixed-use properties within the NNCP area are currently owned by the Greenbriar property owner. As described in Chapter 4, "Alternatives to the Proposed Project," this alternative has been rejected as infeasible because land suitable for development of the project is not available. Nonetheless, a comparative analysis is provided below to describe the comparative environmental effects if this alternative were feasible. For this reason, an off-site alternative that would be located within the North Natomas area is considered

below, but a specific off-site property has not been selected as the “off-site alternative project site.” However, to consider the relative environmental impacts of an alternative in one of the undeveloped areas of the NNCP currently designated for low or medium density residential development, this section provides a comparative analysis of a theoretical off-site alternative within the vacant low or medium density residential properties within the NNCP.

A key version of this alternative is that, if development of the project were to occur within the boundaries of the NNCP, it would displace development that would otherwise occur within the boundaries of the NNCP. It is assumed, therefore, at the overall development of the NNCP would be the same, that is, development of the project would replace a similar level of development already planned within the NNCP. The Greenbriar site would not be developed. Therefore, overall development (considering the NNCP and Greenbriar) would be less under this alternative than under the proposed project if this alternative were feasible.

8.1.1 TRANSPORTATION AND CIRCULATION

Development of an off-site alternative would result in the same trip generation rates as the project (i.e., 41,119 total trips; 3,153 a.m. peak hour and 4,467 p.m. peak hour). The transportation and circulation impacts of an alternative within the existing NNCP boundaries have been projected by the 1993 NNCP EIR (City of Sacramento 1993). The SACMET 2025 traffic analysis model, developed for the North Natomas area, includes the assumptions consistent with the 1993 NNCP EIR and the ultimate land uses projected for the North Natomas area. This model reflects the NNCP and approved land use changes in the North Natomas area, as well as the ultimate roadway configuration planned for the NNCP area, as specified in the NNCP Financing Plan. If the project were to occur within the boundaries of the NNCP, consistent with the NNCP, the additional vehicle trips projected by this EIR would not be additive to overall development assumptions of the NNCP, because they have already been included in these projections. Thus, it can be assumed that an off-site alternative within the boundaries of the NNCP would result in comparatively substantially less traffic impacts; however, specific quantification of the traffic reductions can not be determined without a specific location for the off-site alternative. The same transportation system deficiencies would be expected with the Greenbriar project, although the overall congestion and anticipated delays would be less. Thus, this alternative would result in less transportation and circulation impacts [*Less*].

8.1.2 AIR QUALITY

The air quality impacts identified for the proposed project are related to construction, the land uses proposed (e.g., residential, elementary school and commercial tenants), and the location of these land uses adjacent to I-5 and SR 70/99. Construction of an off-site alternative would result in the same construction and long-term operational emissions as the project (i.e., mitigated to 89.5 lbs/day of ROG and 511.2 lbs/day of NO_x) because the same land uses would be developed. Similarly, operational emissions associated with the off-site alternative would be the same as the proposed project because the same land uses are proposed. As a result, the off-site alternative would result in mitigated emissions of 350.7 lbs/day of ROG, 338.5 lbs/day of NO_x, and 206.6 lbs/day of PM₁₀. However, because overall there would be less development under this alternative than if the Greenbriar site were to develop (see assumptions under description of the alternative), regional emissions would be substantially less than with the project. Further, depending on the location (or multiple locations) of the off-site alternative, the off-site alternative may not be located in close proximity (i.e., within 500 feet) of a nearby freeway (e.g., I-5 or SR 70/99) and may reduce potential less-than-significant health risk-related air quality impacts associated with toxic air contaminants. However, because the specific location for the off-site alternative is not known, it can not be determined with any certainty whether this project would reduce this potential. Therefore, overall the project would result in similar air quality impact [*Similar or less*].

8.1.3 NOISE

Similar to the project, this alternative would result in temporary noise generated by construction activities; development of various noise-generating land uses; increases in traffic noise; and development of sensitive receptors that would be exposed to existing or project noise levels exceeding City standards. Because the off-site alternative would result in the construction of the same facilities and use of similar construction equipment, unmitigated construction-related noise levels would range from 79 to 91 dBA at 50 feet. However, similar to the project, construction activities would be limited to the hours of 7 a.m. to 6 p.m. Monday through Saturday and 9 a.m. to 6 p.m. on Sunday, which would reduce construction-related noise impacts to a less-than-significant level. Because of the developing nature of the NNCP area, it is likely that the off-site alternative would be in close proximity to sensitive receptors. It is unknown whether existing noise levels currently exceed the City's standards; however, construction of an off-site alternative would likely result in an increase in ambient noise levels in the local area and could result in an exceedence of the City's exterior noise standard (i.e., 60 dBA L_{dn} /CNEL). If an alternative were developed within an available site within the NNCP, noise levels associated with roadway traffic volumes would likely be comparatively less (i.e., less than 74 to 81.1 dBA unmitigated) because this site would be located at a greater distance from the combined impacts of traffic noise from I-5 and SR 70/99. Thus, significant noise impacts to residential and school uses may be eliminated depending on the location of the off-site alternative. However, final determination of traffic noise reductions can not be made with knowing the specific location of the off-site alternative. Similarly, although noise impacts at the site from aircraft operations at Sacramento International Airport are less than significant, the off-site alternative would likely be located a greater distance from regularly used flight paths and would therefore be subject to less frequent overflights by aircraft and would likely have reduced single event (SENL) levels. When compared to the project, because of its likely more distant location from I-5 and SR 70/99 and airport operations, the off-site alternative would result in less noise impacts when compared to the project [*Less*].

8.1.4 UTILITIES

An off-site alternative within the NNCP boundaries would generate a similar number of people and create similar utility and service system demands as the proposed project (i.e., water, wastewater, drainage, electricity, and natural gas). These NNCP demands have already been anticipated by the North Natomas Financing Plan (first approved in 1994, and last updated in 2002) and the public facilities fees (PFF) that are collected for projects within the current North Natomas boundaries. The project's demands would be addressed by the financing plan prepared specifically for the project. The significant environmental impacts that would occur with the provision of wastewater treatment services (i.e., expanded wastewater treatment facilities) to the project would not be expected to occur under this alternative because the NNCP area is within the City's corporate boundaries and was planned for in the SRCSD's facility master plan. Therefore, this alternative would eliminate the project's significant and unavoidable impact to wastewater treatment services. Although the proposed project and an off-site alternative within the boundaries of the NNCP would have similar utility system demands, the off-site alternative would eliminate the project's significant and unavoidable impact to wastewater treatment services and impacts would be less [*Less*].

8.1.5 PUBLIC SERVICES

An off-site alternative within the NNCP boundaries would generate a similar number of people and create similar public service demands (i.e., police, fire, schools, and libraries) as the proposed project. These NNCP demands have already been anticipated by the North Natomas Financing Plan (first approved in 1994, and last updated in 2002) and the public facilities fees (PFF) that are collected for projects within the current North Natomas boundaries. The project's demands would be addressed by the financing plan prepared specifically for the project. Further, a site within the NNCP would not result in demands that are additive to overall development demands of the NNCP because they have already been included in these projections. For these reasons, an off-site alternative, while resulting in the same demands as the project based on a per capita demand factor for each service, would have comparatively less public services effects because demands associated with build out of the NNCP area have

already been planned for by the City the NNCP. Overall, this alternative would result in less public services impacts [*Less*].

8.1.6 PARKS AND OPEN SPACE

An off-site alternative within the NNCP boundaries would generate a similar number of residents as the proposed project and would construct the same facilities (i.e., 48.4 net acres of parkland) as the project. The City’s standard for parkland dedication (5 acres per 1,000 new residents or a demand for 48.2 acres) would remain the same regardless of the location of the off-site alternative. However, a site within the NNCP would not result in demands that are additive to overall park demands of the NNCP because they have already been included in these projections. The project would result in the conversion of 577 acres of open space area (518 acres of which are farmlands). While an off-site alternative would likely also result in the conversion of open space areas, the loss of this open space areas were accounted for in the NNCP and its EIR; therefore, this alternative would not result in the additive loss of open space resources. The off-site alternative would have less effects related to parks and open space [*Less*].

8.1.7 AESTHETICS

Under this alternative, it is likely that development of property within the NNCP boundaries would result in the development of open space land or land historically used for farming activities. Therefore, the off-site alternative would result in the same type of land use alterations as the project because the site would be converted to urban land uses. This was identified as a significant and unavoidable impact for the project. However, the project would extend the area of the City that would be converted from agricultural to urban land uses. A development within the NNCP would maintain the City’s boundaries and would not extend the urban core of the City. Lighting would be similarly changed under this alternative, but lighting impacts were not identified as significant project impacts. Overall, this alternative would result in the same aesthetic resources impacts, but these impacts would be less than the project because the existing urban core of the City would be maintained [*Less*].

8.1.8 PUBLIC HEALTH AND HAZARDS

While it is unknown whether an off-site location would have contaminated soils, development within the boundaries of the NNCP would not be expected to result in public health and hazard impacts that could not be addressed by standard mitigation and remediation measures (City of Sacramento 1992). It should be noted that a project site within the boundaries of the NNCP would locate the proposed lake/detention basin at a greater distance from the Sacramento International Airport, which would reduce potential bird hazard impacts in comparison to the project. The Sacramento International Airport discourages the construction of water features which could attract hazardous wildlife within 5 miles of the airport. Although the off-site alternative would construct the same water feature at a greater distance from the airport, it nonetheless would likely be located within the airport’s 5-mile radius and would be considered a hazardous wildlife attractant. However, implementation of the project’s mitigation to reduce bird hazards from the lake would reduce this impact to a less-than-significant level.

An off-site alternative would eliminate the project’s potential inconsistency with the Sacramento International Airport Comprehensive Land Use Plan (CLUP) requirement to limit land uses (i.e., parks and light rail station) that would result in a substantial concentration of people (i.e., 25 persons per acre on average of 50 persons per acre at any one time) because the off-site alternative would be located outside the airport’s overflight safety zone. Therefore, the off-site alternative would eliminate the project’s significant and unavoidable CLUP consistency impact. Further, a site within the NNCP would locate sensitive receptors including the elementary school at greater distances from I-5 and SR 70/99, which would reduce their, exposure to mobile source emissions (see Section 8.1.2, “Air Quality,” above). Thus, an off-site alternative within the boundaries of the NNCP would have less public health and hazard effects [*Less*].

8.1.9 GEOLOGY AND SOILS

The City determined that the NNCP includes measures to reduce soils and geology impacts to a less-than-significant level (City of Sacramento 1992). No unique geologic structures or conditions have been identified in the NNCP area and the NNCP area is substantially similar to the project site in terms of site soils and geotechnical issues (i.e., liquefaction, expansive soils, fault hazards). Similar to the proposed project, standard engineering practices can address design and structural requirements for development of a site within the NNCP boundaries. For these reasons there would be no measurable difference in environmental impacts when comparing the proposed project with an off-site alternative within the boundaries of the NNCP [*Similar*].

8.1.10 HYDROLOGY, DRAINAGE, AND WATER QUALITY

Hydrology and drainage in the NNCP area has been addressed by the Comprehensive Drainage Plan. Similar to the requirements for the proposed project, any development within the NNCP would be required to comply with the City's Grading, Erosion, and Sediment Control Ordinance (Chapter 15.88 of the City Code). A SWPPP would be prepared and BMPs would be required to be implemented to address stormwater quality control during construction and post-construction. With the implementation of these existing requirements, less-than-significant impacts on water quality and hydrology would occur. Further, the alternative would be required to be designed consistent with the City's drainage system standards to ensure adequate drainage facilities are provided on-site and that adequate capacity is available in off-site drainage facilities to handle proposed flows. Drainage impacts were determined to be less than significant with the project. Similar to the project, this alternative would be located in an area that is located outside the Federal Emergency Management Agency's (FEMA) 100-year floodplain and less-than-significant flooding impacts would occur. Therefore, the proposed project and an off-site alternative within the current boundaries of the NNCP would have similar hydrology, drainage, and water quality effects [*Similar*].

8.1.11 AGRICULTURE

Approval of the NNCP required that the City adopt a Statement of Overriding Considerations for the significant impact of conversion of Prime Farmland. The City has determined that conversion of farmlands that were once within the boundaries of the NNCP was an acceptable impact and that there were overriding reasons for approval of development of the NNCP. The project would require a similar finding, because of the presence of Important Farmland at the project site. However, approval of the project would result in the conversion of an additional 518 acres of Important Farmlands beyond the conversions anticipated by the NNCP. Thus, development of an off-site alternative within the boundaries of the NNCP would result in fewer acres (i.e., 518 fewer acres) of Important Farmland being converted to urban uses. For these reasons, an off-site alternative within the boundaries of the existing NNCP would create less impact on Important Farmlands [*Less*].

8.1.12 BIOLOGICAL RESOURCES

Similar to the proposed project, development of the North Natomas community would result in impacts on Swainson's hawk, riparian/wetland habitat, and agricultural lands/rice fields. Without knowing the exact site within the NNCP boundaries that could be pursued for an off-site alternative, it is not possible to perform a detailed comparison of biological impacts. However, development of an off-site alternative within the NNCP would bring the project within the City's permit area identified in the Natomas Basin Habitat Conservation Plan (NBHCP). The NBHCP, the EIR on the NBHCP, and subsequent monitoring programs have evaluated the impacts to biological resources from development within the NNCP area including impacts to giant garter snake and Swainson's hawk. The project is not included in the City's permit area. The biological impacts of the project are subject to ongoing review, including review by resource agencies of the applicant's specific mitigation proposal. Based on these conditions, development of an off-site alternative within the NNCP area would have less biological resource impacts compared to the project. However, because the project will be required to comply

with its own HCP, it would require a finding from USFWS and CDFG that impacts to sensitive biological resources are fully mitigated, it is expected that impacts would not be significant. Nevertheless, because less land would be developed under this alternative, it would have less of an effect on sensitive biological resources. *[Less]*.

8.1.13 CULTURAL RESOURCES

Both the off-site location and the project site would have the potential for undocumented subsurface cultural resources. However, there are no documented resources on either the project site or on Low Density Residential sites within the NNCP. For this reason, the proposed project and an alternative within the current boundaries of the NNCP would have similar effects on cultural resources *[Similar]*.

8.1.14 PROJECT OBJECTIVES

Depending on the specific location, the off-site alternative could meet most if not all of the project's objectives including those related to creation of a pedestrian-friendly development; development of a project that is consistent with SACOG's Blueprint plan, development of a residential development near the major employment centers of downtown Sacramento and Metro Air Park; provision of vertically and horizontally mixed neighborhoods; incorporation of parks and open space in a manner that provides connectivity; creating a residential development with a variety of housing types; and providing housing and employment opportunities that meet the City's long-term housing and employment demand projections. In addition, an off-site alternative could possibly further support and implement the project objective related to developing a project that is consistent with the Sacramento International Airport CLUP because it would eliminate the project's inconsistency with the safety requirement of maintaining a density of 50 persons per acres for the proposed light rail station, and park areas. However, the off-site alternative may not meet the project's objective of providing readily accessible light rail transit opportunities on-site.

8.2 CONSIDERATION OF 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 City's objective in considering the Greenbriar project is to consider development projects that would provide housing and employment opportunities that would meet long-term employment and housing demand projections.

According to the City's General Plan, as of September 2005 there were approximately 14,000 acres of low and medium density parcels of vacant land available. However, this number is likely less than this total, because there continues to be urban development in the North Natomas area, where the majority of this land is concentrated. For example, projects considered in a cumulative context include the Westborough, Cambay West, Natomas Crossing, Natomas Town Center, Natomas Creek and Panhandle projects (Exhibit 6-1), each of which are in the North Natomas area. In the south Sacramento area, SunCal Companies has announced they intend to develop on one of the last remaining large blocks of land in the City, the 800-acre Delta Shores site (Suncal press announcement, November 8, 2005). Vacant industrial sites at the downtown Sacramento and Curtis Park railyards are being actively pursued for development, with applications submitted on both. As this shows, the North Natomas area continues to be actively developed, and other large, vacant, or undeveloped parcels are being actively pursued. Further, much of the land is tied up by other landowners interested in development. None of the undeveloped low or medium density residential or residential /mixed-use properties within the NNCP area or in other large, undeveloped areas of the City are currently owned by the Greenbriar property owner.

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 time eliminating some of the project's significant and significant and

unavoidable environmental impacts. As described above, sufficient holding capacity is available within the City's SOI to accommodate the project's proposed residential development. In spite of the fact that the City may currently have holding capacity for the project, this is not expected to be the case in the foreseeable future. According to Sacramento City staff (McDonald, pers. comm., June 19, 2006), the Technical Background report for the City of Sacramento General Plan Update shows the following:

Current (2005) population:	450,000
Proposed General Plan Holding Capacity (2030):	564,000
Anticipated City population (2030):	650,000

Over the next 25 years, the City is expected to grow by 200,000 people. However, the current General Plan, including the current sphere-of-influence, would accommodate an additional estimated 114,000 people. Additional land would be needed if the City intends to accommodate the 86,000 people above the General Plan's holding capacity that are anticipated to live in the City.

The proposed project would also provide for employment through commercial/retail uses, although these uses would primarily serve residential uses on and near the project site. Projections for employment uses in the City are as follows:

Current (2005) employment:	181,000
Proposed General Plan Holding Capacity (2030):	445,000
Anticipated City employment (2030):	321,000

Unlike housing, the City has ample holding capacity for employment uses. As mentioned above, commercial/retail uses on the project site are intended to be local serving, and they would reduce the need for driving trips outside the project site. So, while they could be provided elsewhere within the City, they would frustrate project objectives for a mixed use development.

8.2.1 TRANSPORTATION AND CIRCULATION

Implementation of a dispersed development alternative would result in similar trip generation rates as the project (i.e., 41,119 total trips; 3,153 a.m. peak hour and 4,467 p.m. peak hour); however, these trips would not be concentrated in one area of the City, but instead would be dispersed throughout multiple properties and areas of the City. Overall, this alternative could result in reduced transportation impacts because proposed trips would be dispersed over a large area; however, quantification of the traffic reductions can not be determined without specific locations for the dispersed development alternative. In some cases, the existing roadway network may currently operate unacceptably and, thus, this alternative would exacerbate these unacceptable conditions. Thus, this alternative would result in similar (but may be greater or lesser) transportation and circulation impacts *[Greater or Less]*.

8.2.2 AIR QUALITY

The air quality impacts identified for the proposed project are related to construction, the land uses proposed (e.g., residential, elementary school and commercial tenants), and the location of these land uses adjacent to I-5 and SR 70/99. Construction of an off-site alternative would result in the same construction and long-term operational emissions as the project (i.e., mitigated to 89.5 lbs/day of ROG and 511.2 lbs/day of NO_x) because the same land uses would be developed. Similarly, operational emissions associated with the dispersed development alternative would be the same as the proposed project because the same land uses are proposed. As a result, the dispersed development alternative would result in mitigated emissions of 350.7 lbs/day of ROG, 338.5 lbs/day of NO_x, and 206.6 lbs/day of PM₁₀. Depending on the multiple locations of the dispersed development alternative, this alternative may not be located in close proximity (i.e., within 500 feet) of a nearby freeway (e.g., I-5 or SR 70/99) and may reduce potential less-than-significant health risk-related air quality impacts associated with toxic air

contaminants. However, because the specific locations for this alternative are not known, it can not be determined with any certainty whether this project would reduce this potential TAC impact. Therefore, overall this alternative would result in similar air quality impacts as the project [*Similar or less*].

8.2.3 NOISE

Similar to the project, this alternative would result in temporary noise generated by construction activities; development of various noise-generating land uses; increases in traffic noise; and development of sensitive receptors that would be exposed to existing or project noise levels exceeding City standards. Because the dispersed development alternative would result in the construction of the same facilities and use of similar construction equipment, unmitigated construction-related noise levels would range from 79 to 91 dBA at 50 feet. However, similar to the project, construction activities would be limited to the hours of 7 a.m. to 6 p.m. Monday through Saturday and 9 a.m. to 6 p.m. on Sunday, which would reduce construction-related noise impacts to a less-than-significant level. Because of the developed nature of the City, it is likely that this alternative would be in close proximity to sensitive receptors. It is unknown whether existing noise levels currently exceed the City's standards; however, construction of a dispersed development alternative would likely result in an increase in ambient noise levels in the local area and could result in an exceedence of the City's exterior noise standard (i.e., 60 dBA L_{dn}/CNEL). If an alternative were dispersed throughout the City, noise levels associated with roadway traffic volumes would likely be comparatively less (i.e., less than 74 to 81.1 dBA unmitigated) because this site would be located at a greater distance from the combined impacts of traffic noise from I-5 and SR 70/99. Thus, significant noise impacts to residential may be eliminated depending on the location of this alternative. However, final determination of traffic noise reductions can not be made with knowing the specific locations for this alternative. Similarly, although noise impacts at the site from aircraft operations at Sacramento International Airport are less than significant, this alternative would likely be located a greater distance from regularly used flight paths and would therefore be subject to less frequent overflights by aircraft and would likely have reduced single event (SENL) levels. When compared to the project, because of its likely more distant location from I-5 and SR 70/99 and airport operations, the dispersed development alternative would result in less noise impacts when compared to the project [*Less*].

8.2.4 UTILITIES

An off-site alternative dispersed throughout the city limits and SOI would generate a similar number of people and create similar utility and service system demands as the proposed project (i.e., water, wastewater, drainage, electricity, and natural gas). These demands have already been anticipated by various public facilities financing programs established by the City. The significant environmental impacts that would occur with the provision of wastewater treatment services (i.e., expanded wastewater treatment facilities) to the project would not be expected to occur under this alternative because dispersed locations would be within the city limits or SOI and have been planned for in the SRCSD's facility master plan. Therefore, this alternative would eliminate the project's significant and unavoidable impact to wastewater treatment services. Although the proposed project and a dispersed development alternative would have similar utility system demands, the dispersed development alternative would eliminate the project's significant and unavoidable impact to wastewater treatment services and impacts would be less [*Less*].

8.2.5 PUBLIC SERVICES

A Dispersed Development alternative within the city limits or SOI would generate a similar number of people and create similar public service demands (i.e., police, fire, schools, and libraries) as the proposed project. These demands have already been anticipated by the City's General Plan and the public facilities fees that are collected for projects within specific service areas. These fees would provide sufficient facilities and capacity to serve this alternative. For these reasons, a dispersed development alternative, while resulting in the same demands as the project based on a per capita demand factor for each service, would have comparatively less public services

effects because demands associated with build out of the city limits or SOI have already been planned for by the City. Overall, this alternative would result in less public services impacts [Less].

8.2.6 PARKS AND OPEN SPACE

A Dispersed Development alternative within the city limits or SOI would generate a similar number of residents as the proposed project and would construct the same facilities (i.e., 48.4 net acres of parkland) as the project. The City's standard for parkland dedication (5 acres per 1,000 new residents or a demand for 48.2 acres) would remain the same regardless of the location of the alternative. While this alternative would also result in the conversion of open space resources, the loss of these were accounted for in the General Plan and its EIR; therefore, this alternative would not result in the additive loss of open space resources. This alternative would have less effects related to parks and open space [Less].

8.2.7 AESTHETICS

Under this alternative, it is likely that development of property within the city limits or SOI could result in the development of open space land or land historically used for farming activities. Therefore, this alternative would result in the same type of land use alterations as the project because the site would be converted to urban land uses. However, it is likely that impacts would be less because some parcels where development could occur would be in urban areas (i.e., infill development). Changes to visual character of the project site was identified as a significant and unavoidable impact for the project. However, the project would extend the area of the City that would be converted from agricultural to urban land uses. A development within the city limits or SOI would maintain the City's boundaries and would not extend the urban core of the City. Lighting would be similarly changed under this alternative, but lighting impacts were not identified as significant project impacts. Overall, this alternative would result in the same aesthetic resources impacts, but these impacts would be less than the project because the existing urban core of the City would be maintained [Less].

8.2.8 PUBLIC HEALTH AND HAZARDS

While it is unknown whether an off-site location would have contaminated soils, development within the City's SOI would not be expected to result in public health and hazard impacts that could not be addressed by standard mitigation and remediation measures (City of Sacramento 1992). It should be noted that because development would be dispersed over multiple properties, the project's proposed lake/detention basin would likely not be constructed. As a result, this alternative would eliminate the project's potential wildlife hazard impacts. However, implementation of the project's mitigation to reduce bird hazards from the lake would reduce this impact to a less-than-significant level.

A dispersed development alternative would eliminate the project's potential inconsistency with the Sacramento International Airport Comprehensive Land Use Plan (CLUP) requirement to limit land uses (i.e., parks and light rail station) that would result in a substantial concentration of people (i.e., 25 persons per acre on average of 50 persons per acre at any one time) because this alternative would be located outside the airport's overflight safety zone. Therefore, the dispersed development alternative would eliminate the project's significant and unavoidable CLUP consistency impact. Further, a site within the NNCP would locate sensitive receptors including the elementary school at greater distances from I-5 and SR 70/99, which would reduce their, exposure to mobile source emissions (see Section 8.1.2, "Air Quality," above). Thus, a dispersed development alternative within the city limits or SOI would have less public health and hazard effects [Less].

8.2.9 GEOLOGY AND SOILS

The City's General Plan and various community plans include measures to reduce soils and geology impacts to a less-than-significant level. No unique geologic structures or conditions have been identified in greater Sacramento

area and other areas within the City are substantially similar to the project site in terms of site soils and geotechnical issues (i.e., liquefaction, expansive soils, fault hazards). Similar to the proposed project, standard engineering practices can address design and structural requirements for development of a site within the NNCP boundaries. For these reasons there would be no measurable difference in environmental impacts when comparing the proposed project with a dispersed development alternative within the boundaries of the NNCP [Similar].

8.2.10 HYDROLOGY, DRAINAGE, AND WATER QUALITY

Similar to the requirements for the proposed project, any development within the City would be required to comply with the City's Grading, Erosion, and Sediment Control Ordinance (Chapter 15.88 of the City Code). A SWPPP would be prepared and BMPs would be required to be implemented to address stormwater quality control during construction and post-construction. With the implementation of these existing requirements, less-than-significant impacts on water quality and hydrology would occur. Further, the alternative would be required to be designed consistent with the City's drainage system standards to ensure adequate drainage facilities are provided on-site and that adequate capacity is available in off-site drainage facilities to handle proposed flows. Drainage impacts were determined to be less than significant with the project. This alternative could be accommodated in areas located outside the Federal Emergency Management Agency's (FEMA) 100-year floodplain; therefore, less-than-significant flooding impacts would occur. Therefore, a dispersed development alternative within the city limits or SOI would have similar hydrology, drainage, and water quality effects compared to the project [Similar].

8.2.11 AGRICULTURE

Approval of the project would result in the conversion of 518 acres of Important Farmlands and 465 acres of open space areas. While a dispersed development alternative would likely also result in the conversion of Important Farmlands, the loss of these were accounted for in the General Plan and its EIR; therefore, this alternative would not result in the additive loss of farmland. For these reasons, a dispersed development alternative within the city limits or SOI would create less impact on Important Farmlands [Less].

8.2.12 BIOLOGICAL RESOURCES

Similar to the proposed project, development within the city limits and SOI would result in impacts on Swainson's hawk, riparian/wetland habitat, and agricultural lands/rice fields. Without knowing the exact sites within the city limits or SOI that could be pursued for a dispersed development alternative, it is not possible to perform a detailed comparison of biological impacts. Implementation of a dispersed development alternative in the city limits or SOI would be anticipated to result in similar resource impacts as those affected by the project (e.g., foraging habitat, wetlands) and would result in similar take of species because habitat and species present at the project site is common throughout the City and surrounding areas. Developments north of the American River would be located within the City's permit area identified in the Natomas Basin Habitat Conservation Plan (NBHCP). The NBHCP, the EIR on the NBHCP, and subsequent monitoring programs have evaluated the impacts to biological resources from development within the NNCP area including impacts to giant garter snake and Swainson's hawk. Because this alternative would result in similar habitat and species impacts as the project, it would have similar effects on sensitive biological resources [Similar].

8.2.13 CULTURAL RESOURCES

Both the dispersed development site locations and the project site would have the potential for undocumented subsurface cultural resources. However, there are no documented resources on either the project site or on Low Density Residential sites within the NNCP. For this reason, the proposed project and an alternative within the city limits or SOI would have similar effects on cultural resources [Similar].

8.2.14 PROJECT OBJECTIVES

Because of the dispersed nature of this alternative, this alternative would likely not meet many of the project's objectives including development of a residential development near the major employment centers of downtown Sacramento and Metro Air Park; provision of vertically and horizontally mixed neighborhoods; incorporation of parks and open space in a manner that provides connectivity; creating a residential development with a variety of housing types; and creating a development that could support a light rail station. However, this alternative could possibly further support and implement the project objective related to developing a project that is consistent with the Sacramento International Airport CLUP because it would eliminate the project's inconsistency with the safety requirement of maintaining a density of 50 persons per acres for the proposed light rail station, and park areas. Further, this alternative would be consistent with the City's infill development strategy and would contribute to meeting long-term housing and employment demand projections.

8.3 CONSIDERATION OF A REDUCED SIZE ALTERNATIVE

The key objective of the reduced size alternative is to avoid or reduce several of the significant and unavoidable environmental impacts identified for the project including minimizing impacts to farmland, noise compatibility, air quality, traffic, sensitive habitat and species, and hazards. As described in section 4.2.2, "Reduce 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. Although this alternative would constrain development at the project site to a development level that may not be financially feasible to implement, it would achieve most if not all of the project's objectives including providing sufficient development densities to support a light rail station and would be consistent with SACOG's Blueprint.

Development of this alternative would be approximately 80% of proposed project levels (20% reduction in proposed development at the site) (Exhibit 4-1). 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, open space areas, 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 provide a buffer on the eastern and southern boundaries of the site in addition to the proposed buffer on the western boundary of the project site. In general, this alternative would result in a development project that provides a 200- to 400-foot open space buffer along the eastern, southern, and western edges of the project site.

8.3.1 TRANSPORTATION AND CIRCULATION

The reduced size alternative would reduce the number of housing units developed at the project site by approximately 20%, resulting in a corresponding 20% reduction in daily traffic volumes on local roadways. Therefore, the reduced size alternative would result in the generation of 32,896 total trips (2,523 a.m. peak hour and 3,574 p.m. peak hour trips). Based on evaluation of the surrounding roadway network, a reduction of approximately 75% of total trip generation (i.e., not to exceed 10,280 total trips) would be required to eliminate the project's significant and significant and unavoidable transportation system impacts including impacts to local roadway intersections, roadway segments, freeway ramps, and freeway segments. Therefore, while this alternative would result in less traffic on area roadways, it nonetheless would continue to result in significant and unavoidable transportation impacts because existing traffic volumes are either closely approaching unacceptable operating conditions or currently exceed acceptable operating thresholds for these facilities. However, it should be noted that mitigation recommended for the project would like result in more efficient and less congested operation of the local roadway network under the reduced size alternative compared to the project. Further, because of its reduced size and the reduced number of traffic trips generated by this alternative, this alternative would result in

less transportation and circulation impacts compared to the project, but these impacts would continue to be significant and unavoidable [*Less*].

8.3.2 AIR QUALITY

This alternative would result in development of the majority of the project site and the generation of construction- and operations-related air emission. Air emissions would be approximately 20% less under this alternative because of the reduced number of houses and commercial acreage (and associated vehicle trips). However, because a majority (i.e., 80%) of construction activities and proposed uses would occur, this alternative would also result in the generation of air emissions that exceed relevant standards of the Sacramento Metropolitan Air Quality Management District (SMAQMD) (i.e., construction-related emissions mitigated to 71.6 lbs/day of ROG and 408.96 lbs/day of NO_x) and operational emissions mitigated to 280.6 lbs/day of ROG, 270.8 lbs/day of NO_x, and 165.3 lbs/day of PM₁₀) This alternative would provide a greater setback between I-5 and SR 70/99 from sensitive receptors through the provision of a 200- to 400-foot buffer along the eastern and southern boundaries of the project site. This setback would further reduce less-than-significant (due to reduced exposure resulting from emissions controls over time; see Section 6.2, “Air Quality”) exposure to toxic air contaminants from freeway operations, and could depending on other design considerations (e.g., soundwalls, tree lines) eliminate any concerns surrounding this concern. Overall, this alternative would result in less construction- and operation-related air emissions compared to the project, but these impacts would continue to be significant and unavoidable, and this alternative would likely substantially reduce or avoid the project’s significant toxic air contaminant impacts [*Less*].

8.3.3 NOISE

Both this alternative and the proposed project would result in temporary noise generated by construction activities; development of various noise generating land uses; increases in traffic noise; and development of sensitive receptors that would be exposed to existing or project-generated noise levels exceeding City standards. Construction-related noise impacts would be the same as the proposed (i.e., unmitigated construction-related noise levels ranging from 79 to 91 dBA at 50 feet) because the same types and numbers of construction equipment would be used. However, noise levels at nearby sensitive receptors may be reduced because of the larger buffer areas provided around the development site. Similar to the project, construction activities would be limited to the hours of 7 a.m. to 6 p.m. Monday through Saturday and 9 a.m. to 6 p.m. on Sunday, which would reduce construction-related noise impacts to a less-than-significant level. Given the relative level of traffic (80% of project), compared with the project, traffic noise would be reduced. This alternative would also shift the project footprint of the site to the center and would provide a greater distance between the development and the major noise source of the Sacramento International Airport. More importantly, this alternative would provide a greater setback from major transportation noise sources, I-5 and SR 70/99, thereby reducing and perhaps eliminating exterior and interior noise level exceedances at sensitive receptors. However, because of the constrained nature of the site and the need to locate the elementary school outside the overflight safety zone of the Sacramento International Airport, it may not be feasible to re-locate the elementary school such that the benefit of increased noise reduction could be achieved. Overall, this alternative would reduce noise impacts to some noise sensitive land uses and impacts would be less than the project [*Less*].

8.3.4 UTILITIES

Under this alternative, public utility demands would be approximately 20% less; however, these impacts are less than significant or less than significant with mitigation for the project. No significant utilities impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any such impacts. Indirect impacts related to regional improvement projects (i.e., wastewater treatment expansion) would be similar. Overall, this alternative would result in similar environmental impacts (i.e., based on CEQA thresholds) as the project, although unit demands for utility services would be less because this alternative would reduce the total population living on-site [*Similar*].

8.3.5 PUBLIC SERVICES

Under this alternative, public service demands would be approximately 20% less; however, these impacts are less than significant or less than significant with mitigation for the project. No significant utilities impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any such impacts. Overall, this alternative would result in similar environmental impacts (i.e., based on CEQA thresholds) as the project, although unit demands for public services would be less because this alternative would reduce the total population living on-site [*Similar*].

8.3.6 PARKS AND OPEN SPACE

Although reduced in size, it is assumed this alternative would provide comparable park land as the project and would meet the City's standard for parkland dedication (5 acres per 1,000 new residents). Based on a population of 7,141 residents, approximately 35.71 acres of parkland would be provided under this alternative. However, because of the need to provide buffers around the perimeters of the project site to reduced noise and air quality impacts associated with traffic on I-5 and SR 70/99 and the constraints associated with the airport safety zone, it may be potentially infeasible for this alternative to provide a community park (i.e., a park of 23 acres or more). Nonetheless, it is expected that this alternative would meet its park demand requirements. This alternative would convert approximately 20% less open space areas because of its reduced size. Therefore, the proposed project and this alternative would have similar effects related to parks and open space [*Similar*].

8.3.7 AESTHETICS

Under this alternative there would be the same alteration of views, but at a reduced scale, of the project site from surrounding lands including I-5, SR 70/99, and local roadways. This impact was identified as significant and unavoidable with the project. With this alternative, this impact would also be considered significant and unavoidable because the view shed would substantially changed from existing conditions, similar to what would occur with the project. Lighting would be slightly less under this alternative, but lighting impacts were not identified as significant project impacts. Overall aesthetic resources impacts would be perceived as nearly the same as the project because the site would be substantially converted from any open space to a developed use [*Similar*].

8.3.8 PUBLIC HEALTH AND HAZARDS

In general, this alternative would result in the same land uses and same project amenities including the proposed light rail station. This alternative would reduce the number of houses within the overflight safety zone of the Sacramento International Airport, thereby reducing potential safety risks associated with airport operations. This alternative would, however, include a proposed light rail station, commercial uses, and parks which would be incompatible with safety standards of the Sacramento International Airport's CLUP. Further, this alternative would also locate a lake/detention basin within the airport safety zone, which could create potential bird strike hazards for commercial aircraft. However, implementation of mitigation recommended for the project would reduce this impact to a less-than-significant level. Overall, this alternative would reduce the development and land uses that would fall within the airport safety zone, thereby reducing the number of residents and tenants that are exposed to potential aircraft hazards. Therefore, this alternative would result in less public health and hazards impacts [*Less*].

8.3.9 GEOLOGY AND SOILS

Under this alternative there would be a reduction in project development; therefore impacts related to construction erosion and risks from seismic and soil hazards would be reduced. Nonetheless, because of its substantial size (i.e., greater than 15 acres), this alternative would include the same soil erosion (i.e., preparation of a SWPPP) and

soil hazards mitigation measures as the project; therefore, post mitigation impacts would not change (i.e., impacts would be less than significant). Therefore, this alternative would result in similar geology and soils impacts [Similar].

8.3.10 HYDROLOGY, DRAINAGE, AND WATER QUALITY

In general, this alternative would result in the same hydrology and water quality impacts as the project because a substantially similar, but somewhat reduced development would occur. This alternative would reduce the volumes of stormwater discharges from the site. Nevertheless, because both the project and this alternative would be designed in accordance with City drainage standards, would ensure that sufficient capacity exists in off-site drainage facilities, and would implement BMPs for water quality, this alternative would result in similar hydrology and water quality impacts. Similar to the project, this alternative would be located in an area that is located outside the Federal Emergency Management Agency's (FEMA) 100-year floodplain. Therefore, less-than-significant flooding impacts would occur. Therefore, the proposed project and reduced size alternative would have similar hydrology, drainage, and water quality effects [Similar].

8.3.11 AGRICULTURE

The viability of the buffer areas on the project site (i.e., long, narrow 200- to 400-foot wide strips of land) for agricultural operations would likely be infeasible. In general, large areas dedicated to agricultural operations are needed to have a viable farming operation. Further, potential land use incompatibilities (e.g., air, noise) associated with agricultural operations adjacent to urban development increases the likelihood that a viable agricultural operation surrounding the project site would not occur. Therefore, although the foot print of this alternative would result in less development and direct conversion of Important Farmland, the net effect because of land use compatibilities and lack of viable farming properties would be similar to the project (i.e., conversion of 518 acres of Important Farmland) and with mitigation would be significant and unavoidable. However, this alternative would reduce the acreage of open space converted to urban land uses; however, because of the substantial size of this alternative and the lack of full compensatory mitigation, this impact would remain significant and unavoidable. Nonetheless, this alternative would reduce impacts to Important Farmland and overall impacts would be less [Less].

8.3.12 BIOLOGICAL RESOURCES

This alternative would reduce the development footprint of the project site and would increase the buffer area along the western, eastern, and southern boundaries of the site (i.e., up to 400 feet). Therefore, this alternative would reduce overall impacts to giant garter snake. Further, similar mitigation to enhance giant garter snake habitat at off-site location would also be provided. There would be increased Swainson's hawk foraging habitat at the site under this alternative. Other habitat and species impacts would be comparable under this alternative, but would occur to a lesser degree (e.g., wetland impacts). Overall, this alternative would result in less biological resources impacts. However, because less of the site would be developed, less off-site mitigation would need to be purchased and enhanced for the benefit of species affected. The establishment of off-site preserves designed for the benefit of species is intended to fully offset the impacts of project development. Under this alternative, the need for off-site mitigation would be less. Because the mitigation is designed to offset the impacts, impacts under this alternative would be similar to the proposed project.[Similar].

8.3.13 CULTURAL RESOURCES

Because this alternative would result in development of the majority of the project site and ground-disturbing activities would occur across the site, impacts to unknown archaeological resources would be potentially significant with this alternative similar to those of the project. However, with implementation of mitigation recommended for the project, this impact would be reduced to a less-than-significant level. This alternative would

not reduce or avoid and significant cultural resource impact of the project, so overall cultural resource impacts would be similar to the project [*Similar*].

8.3.14 PROJECT OBJECTIVES

The reduced size alternative would meet most if not all of the project's objectives including those related to creation of a pedestrian-friendly development; development of a project that is generally consistent with SACOG's Blueprint development plan, development of a residential development near the major employment centers of downtown Sacramento and Metro Air Park; provision vertically and horizontally mixed neighborhoods; incorporation of parks and open space in a manner that provides connectivity; and creating a residential development with a variety of housing types. However, because of its reduced size and reduced population densities, the reduced size alternative may not provide a sufficient population base to support the construction of a light rail station on the project site and it would not provide as great a benefit toward meeting the City's long-term housing and employment demand projections.

8.4 CONSIDERATION OF NO PROJECT ALTERNATIVE – CONTINUATION OF EXISTING LAND USES

The key objective of the no project alternative is to continue existing land use activities on the project site consistent with the County's agricultural land use designations for the site. The project site has been or is currently in agricultural production and agricultural support uses. The majority of the site currently consists of rice fields/former rice fields and associated water canals. A racehorse training facility was previously located in the northwest corner of the project site but has been demolished and only remnant building foundations and the dirt racetrack remain. This alternative would not develop the project site with urban land uses and the project site would continue to operate in an agricultural/farming capacity including rice and row crop cultivation.

8.4.1 TRANSPORTATION AND CIRCULATION

The no project alternative would not develop any urban land uses on the project site. Therefore, traffic volumes on local roadways would not increase as a result of the project. Because no changes in land uses would occur from existing condition, this alternative would not generate any increased daily vehicle trips and would not cause any impacts to local roadways or intersections. Therefore, this alternative would eliminate the project's significant and unavoidable transportation impacts to local intersections, roadway segments, freeway ramps, and freeway segments. Overall, the no project alternative would result in substantially less transportation and circulation impacts compared to the project [*Less*].

8.4.2 AIR QUALITY

Because the no project alternative would not develop any urban land uses on the project site, and no construction activities would occur, this alternative would not generate any construction- or operational-related air emissions (e.g., ROG, NO_x, PM₁₀, or TAC's). The project would result in significant and unavoidable impacts related to construction emissions, increases in stationary source TAC's, and long-term regional emissions. Implementation of the no project alternative would eliminate these impacts. However, farming activities would likely occur at the site and these activities would result in the generation of fugitive dust emissions associated with disking and plowing activities. Quantified dust emissions associated with on-site farming operation are known, but depending the crops that are produced and how crops are rotated at the site, this alternative could result in the substantial generation of fugitive dust emissions, but because of their intermittent nature would not likely result in significant air quality impacts. Overall, this alternative would reduce or eliminate the project's significant and unavoidable air quality impacts; therefore, impacts would be less [*Less*].

8.4.3 NOISE

No construction activities would occur under this alternative because no development would occur. As a result, this alternative would eliminate the project's construction-related noise impacts; however, these impacts are reduced to a less-than-significant level with implementation of recommended mitigation. Noise impacts associated with aircraft overflights would not occur because no new residential land uses would be developed on-site. Further, mobile-source noise impacts associated with traffic on I-5 and SR 70/99 would not occur because no residences would be located in close proximity to these noise sources. Implementation of this alternative would eliminate all of the project's significant and unavoidable noise impacts [Less].

8.3.4 UTILITIES

No increased demands for utility services would occur under this alternative because no new development would occur. While the project's utility impacts were determined to be less than significant with mitigation, this alternative would not result in the need to construct or extend existing utilities to the site, the construction of which could result in significant environmental effects. As such, this alternative would result in less utility impacts compared to the project [Less].

8.4.5 PUBLIC SERVICES

Under this alternative, demand for public services would not occur. Although no significant public service impacts were identified for the project after mitigation, this alternative would not create the need to extend public services (e.g., fire protection, law enforcement, schools) to the project site. As such, this alternative would result in less utility impacts compared to the project [Less].

8.4.6 PARKS AND OPEN SPACE

Because the no project alternative would not develop any urban land uses, this alternative would not require development or dedication of park land as defined by City standards and would have no demands for park facilities. Further, no open space lands would be converted. For these reasons, this alternative would have less effects related to parks and open space [Less].

8.4.7 AESTHETICS

The no project alternative would not develop any urban land uses on the project site. Therefore, alteration of existing views from surrounding lands including I-5, SR 70/99, and local roadways would not occur. This impact was identified as significant and unavoidable with the project. With this alternative, this impact would not occur because the view shed would not change from existing conditions. Overall, aesthetic resource impacts would be perceived as less than the proposed project because the site would not convert from existing agricultural land uses to a developed use [Less].

8.4.8 PUBLIC HEALTH AND HAZARDS

Under this alternative no new development would occur; therefore, no residents or tenants of the site would be exposed to aircraft safety hazards (i.e., bird strikes) associated with the location of a lake/detention basin on-site. However, this impact would be reduced to a less-than-significant level with implementation of recommended mitigation under the project. Nonetheless, this alternative would eliminate this potential safety impact and it would also eliminate the project's potential inconsistency with the CLUP because no land uses are proposed that would be inconsistent with development standards in the CLUP (i.e., parks, commercial, light rail station). This alternative eliminates the project's interim significant and unavoidable flooding hazard impacts because no

housing would be located on the project site. Therefore, the no project alternative would result in less public health and hazards impacts compared to the project [*Less*].

8.4.9 GEOLOGY AND SOILS

Under this alternative there would be no development of urban land uses; therefore impacts related to construction erosion and risks from seismic and soil hazards would not occur. While farming activities at the site could result in exposed soils, which could lead to potential erosion impacts, these impacts are anticipated to be minor and would not increase from existing conditions. This alternative would not construct any buildings or structures on the project site and, as a result, would not result in any soil hazard impacts (e.g., liquefaction, soil expansion). Overall, the no project alternative would result in less geology and soils impacts compared to the proposed project [*Less*].

8.4.10 HYDROLOGY AND WATER QUALITY

This alternative would reduce the volumes of stormwater discharges from the site because development of urban land uses would not occur. Further, this alternative would not develop land uses (e.g., homes, structures) that would be subject to a flooding risk during storm events. While flooding impacts would be less-than-significant, this alternative would result in less hydrology and water quality impacts than the proposed because no structures would be constructed on-site [*Less*].

8.4.11 AGRICULTURE

Agricultural operations on the project site would continue under this alternative and the potential for conflicts between urban land uses and surrounding agricultural operations would not occur. Further, implementation of this alternative would not result in the conversion of any Important Farmlands to urban land uses. Therefore, impacts to agriculture would be less compared to the proposed project [*Less*].

8.4.12 BIOLOGICAL RESOURCES

This alternative would not develop any urban land uses on the project site and existing biological and wildlife habitats on the project site would remain unchanged. As a result, this alternative would avoid the project's significant biological resource impacts; however, these impacts would be reduced to a less-than-significant level with implementation of recommended mitigation. It is important to note that this alternative would not provide any mitigation lands that would serve to enhance giant garter snake habitat in the local area at an off-site location. Nonetheless, this alternative would result in less overall biological resource impacts [*Less*].

8.4.13 CULTURAL RESOURCES

Although this alternative would not result in development of the project site, ground-disturbing activities (i.e., disking and plowing) would still occur on the project site. However, these activities would likely not extend to the same depths as the project (i.e., 2-3 feet versus 10-15 feet). Nonetheless, because ground-disturbing activities would continue, this alternative would result in the same potentially significant impacts associated with the discovery of previously undiscovered cultural resources. Mitigation recommended for the project would reduce these impacts to a less-than-significant level. Therefore, this alternative would result in similar cultural resource impacts [*Similar*].

8.4.14 PROJECT OBJECTIVES

The no project alternative would not meet any of the project's objectives including those related to development of a light rail station, creation of a pedestrian-friendly development; development of a project that is generally

consistent with SACOG’s Blueprint development plan, development of a residential development near the major employment centers of downtown Sacramento and Metro Air Park; provision vertically and horizontally mixed neighborhoods; incorporation of parks and open space in a manner that provides connectivity; and creating a residential development with a variety of housing types along the DNA line. This alternative would not further the City’s goal to provide sufficient and additional housing opportunities to area residents and would not contribute to meeting long-term housing and employment demand projections.

8.5 SUMMARY OF COMPARATIVE EFFECTS OF THE PROJECT SITE ALTERNATIVES

Table 8-1 summarizes the environmental analysis provided above for the off-site alternative, dispersed development alternative, reduced size alternative, and the no project alternative.

Table 8-1 Comparison of Environmental Impacts of Alternatives in Relation to the Proposed Project				
Issue Area	No Project Alternative— Continuation of Existing Land Uses (NP)	Off-site Alternative	Dispersed Development Alternative	Reduced Size Alternative
Traffic and Circulation	Less	Less	Greater or Less	Less
Air Quality	Less	Similar or Less	Similar or Less	Less
Noise	Less	Less	Less	Less
Utilities	Less	Less	Less	Similar
Public Services	Less	Less	Less	Similar
Parks and Open Space	Less	Less	Less	Similar
Aesthetics	Less	Less	Less	Similar
Public Health and Hazards	Less	Less	Less	Less
Geology and Soils	Less	Similar	Similar	Similar
Hydrology and Water Quality	Less	Similar	Similar	Similar
Agriculture	Less	Less	Less	Less
Biological Resources	Less	Less	Similar	Similar
Cultural Resources	Similar	Similar	Similar	Similar

8.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the alternatives to the proposed project, CEQA requires that an “environmentally superior” alternative among the alternatives considered be selected and the reasons for such selection disclosed. In general, the environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts. In the case of the project, the no project alternative is the environmentally superior alternative because it would not create any new site-specific adverse environmental impacts. However, CEQA requires the identification of another environmentally superior alternative when the “no project” alternative is identified as environmentally superior (State CEQA Guidelines Section 15126[e][2]).

The reduced size alternative would be environmentally superior to the project because it would substantially reduce the project’s traffic, air, noise, farmland, and biological resources impacts. Further, it would meet most project objectives including supporting light rail and creating a development consistent with SACOG’s Blueprint.

An off-site alternative within the existing boundaries of the NNCP would be environmentally superior to the project and to the reduced size alternative. This alternative is the overall superior alternative because it would avoid the project's significant aircraft safety hazard impact associated with compatibility with CLUP standards and it would substantially reduce traffic, farmland, biological, air quality, and noise impacts. Further, it would meet most if not all project objectives. However, a site within the NNCP is not currently owned by the project applicant and all land in the NNCP area is currently proposed for development. Therefore, it is not known whether the off-site alternative considered in this analysis is feasible. Further, this alternative would not meet the key project objective of providing a development along the DNA line.

The dispersed development alternative would not be environmentally superior to the project. While this alternative would avoid the project's significant aircraft safety hazard impacts associated with compatibility with CLUP standard and it would substantially reduce traffic, farmland, biological, air quality, and noise impacts, depending on localized conditions could result in greater transportation impacts compared to the project. Further, multiple sites within the city limits or SOI are not owned by the project applicant and most land with the City is currently proposed for development. Therefore, it is not known whether this theoretical off-site alternative considered in this analysis is feasible. Further, development of an alternative in a dispersed nature would not achieve the key project objectives related to providing residential development that would support development of a light rail station along the DNA line.