

4 ALTERNATIVES

CEQA requires that an EIR describe the relative environmental effects of alternatives to the proposed project and evaluate their comparative impacts and merits. LAFCo has considered a range of alternatives that can feasibly attain most of the basic project objectives and avoid or substantially lessen one or more significant effects. Alternatives that would impede to some degree the attainment of the project objectives or would be more costly may also be considered.

The alternatives analysis must identify the potential alternatives, and include sufficient information about each to allow meaningful evaluation, analysis, and comparison with the proposed project. The discussion must focus on potentially feasible alternatives that can avoid or substantially reduce the significant effects of the proposed project. The environmentally superior alternative must be identified among the alternatives considered.

Qualitative and quantitative measures of alternative feasibility may include site suitability, economic viability, availability of infrastructure, general plan consistency, consistency or conflict with other plans or regulatory limitations, jurisdictional boundaries, and whether the project applicant can reasonably acquire, control, or otherwise have access to an alternative site. Similarly, if an alternative would cause one or more significant effects, in addition to those that would be caused by the proposed project, the significant effects of the alternative must be discussed, but in less detail than the project analysis.

As required by CEQA, the alternatives analysis must evaluate the “no project” alternative. “No project” is defined as what would occur within the project site if the project were not to be approved. The “no project” alternative may consider what could reasonably occur on the project site if existing development trends continue, to the degree that adopted or proposed general plans and zoning, and existing infrastructure, services, or other relevant conditions allow.

4.1 SELECTION OF ALTERNATIVES

Alternatives were selected for evaluation in this EIR based on criteria in the CEQA Guidelines (California Code of Regulations [CCR] Section 15126.6). These criteria include (1) ability of the alternative to attain most of the basic project objectives; (2) feasibility of the alternative; and (3) ability of the alternative to avoid or substantially reduce one or more significant environmental effects of the proposed project. These criteria are discussed in more detail below.

LAFCo also received input as a part of the Notice of Preparation (NOP) and scoping process regarding potential alternatives.

- ▶ A commenter suggested an alternative that provides a buffer between urban development and the potential future Urban Services Boundary. The buffer could be used for habitat restoration or agricultural activities.
- ▶ Several commenters suggested that the SOIA Area be expanded to include their property.
- ▶ A commenter suggested that the EIR consider development of the area for wildlife and farmland buffers dedicated to such uses in perpetuity. Such development could include commercial farming, eco-tourism, wildlife research, recreation, establishment of refuges, and agricultural education programs.

- ▶ A commenter suggested that development occur on vacant land within the City limits instead.

Commenters also provided remarks on environmental issues of interest, some of which are addressed by the alternatives provided in this section:

- ▶ The impact on public services and utilities
- ▶ Concerns about water availability
- ▶ Concerns about Suburban Propane
- ▶ Impacts to biological resources, including Swainson's Hawk
- ▶ Concerns about the ability of the as-yet-unpublished South Sacramento Habitat Conservation Plan (SSHCP) to meet required mitigation standards
- ▶ Transportation and traffic impacts
- ▶ Growth-inducing impacts
- ▶ Concerns about Farmland of Local Importance
- ▶ Effects of greenhouse gas emissions
- ▶ Consistency with the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy

Please see Appendix A for the NOP and comment letters and Section 1.0, "Introduction" for a summary of responses to the NOP.

4.1.1 ABILITY OF THE ALTERNATIVE TO ATTAIN MOST PROJECT OBJECTIVES

LAFCo has evaluated potential alternatives relative to the objectives of the proposed project. For the purpose of alternatives analysis under CEQA, project objectives may not be defined so narrowly that the range of alternatives is unduly constrained.

PROJECT PURPOSE AND OBJECTIVES

The purpose of a city SOI is to provide holding capacity for the city to be able to plan for employment opportunities and an expanding population. The nature of this project – a SOIA request – has important implications for the project objectives, as does LAFCo's role as the lead agency for this project. As detailed in Chapter 2 of this EIR, "Project Description," the project is a landowner initiated proposal to amend the spheres of influence of the City of Elk Grove, Sacramento Area Sewer District (SASD), and the Sacramento Regional County Sanitation District (SRCSD). The project does not propose land use change or development. Therefore, project objectives do not focus on outcomes that relate to land use, development type or scale, or spatially specific planning components within the proposed SOIA Area. Also, LAFCo has the authority to approve, modify and approve, or disapprove applications, and to impose mitigation measures and conditions of approval, but cannot impose any conditions that would directly regulate land use density or intensity, property development, or subdivision requirements. Consistent with LAFCo's role, the project objectives do not dictate outcomes related to

future land use, density, development intensity, or related topics that are the purview of local land use entitlement authorities in California.

The project objectives include the following:

- ▶ Amend the SOI boundary beyond the existing Elk Grove City limits to accommodate orderly and sustainable growth consistent with the City’s General Plan.
- ▶ Implement the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 consistent with public service conditions present or reasonably foreseeable in the proposed SOIA Area.
- ▶ Establish a logical boundary within which future annexation requests into the City of Elk Grove may be considered.
- ▶ Consider providing land to accommodate a jobs-housing ratio for the City of Elk Grove that provides for sufficient residential and employment-generating lands uses to minimize the need for commuting to or from other jurisdictions.
- ▶ Establish an SOI for the City of Elk Grove that will facilitate the protection of important environmental, cultural, and agricultural resources.

4.1.2 FEASIBILITY OF THE ALTERNATIVES

Alternatives were evaluated according to the “rule of reason” and general feasibility criteria suggested by the CEQA Guidelines CCR Section 15126.6 as follows:

The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

The inclusion of an alternative in an EIR does not necessarily mean the alternative is feasible. Rather, the inclusion of an alternative in an EIR indicates that lead agency staff has determined that the alternative is potentially feasible. Criteria include the suitability of the site or alternative site; the economic viability of the alternative; the availability of infrastructure; the consistency of the alternative with the General Plan, zoning, and other plans and regulatory limitations; and the effect of applicable jurisdictional boundaries.

4.1.3 AVOIDANCE OR SUBSTANTIAL REDUCTION OF SIGNIFICANT EFFECTS

The evaluation of alternatives must also take into account the potential of the alternative to avoid or substantially lessen any of the significant effects of the proposed project, as identified in this EIR. The potential environmental effects of the proposed project are summarized in the “Executive Summary” of this EIR.

4.2 ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS IN THE EIR

4.2.1 PROVIDE A BUFFER

A commenter suggested an alternative that provides a buffer between urban development and the potential future Urban Services Boundary. The buffer could be used for habitat restoration or agricultural activities.

The proposed project does not propose any development or identify any specific areas for development. In the future, if annexation and development is proposed, mitigation measures or design features such as a buffer could be considered as a part of future planning that would be under the jurisdiction of the City of Elk Grove. While LAFCo has elected not to examine this alternative in detail, LAFCo has elected to examine a reduced size alternative that would effectively create a buffer between urban development and existing agricultural activities and sensitive habitats, helping to preserve those areas.

4.2.2 EXPANDED SOIA AREA

Several commenters suggested that the SOIA Area be expanded to include their property. This alternative would not reduce any significant environmental effects. LAFCo has elected not to examine this alternative in detail.

4.2.3 CONSISTENCY OF THE SOIA AREA'S LAND USE DESIGNATIONS WITH THE CITY'S GENERAL PLAN UPDATE

The SOIA Area is part of the larger 3,675-acre area identified in the General Plan Update as the South Study Area (City of Elk Grove 2017). The General Plan updated EIR NOP presents two land plan program scenarios for the South Study Area. Table 3.11-1 in Section 3.11 shows the proposed General Plan Update land use designations for the South Study Area and a percent range of total acreage for each land use. In addition, Table 3.11-1 compares the applicant's proposed conceptual land use scenario for the SOIA Area and the percent of proposed acreage for each land use. As shown in Table 3.11-1, the conceptual land use plan's proposed multi-family residential land uses (8 percent), commercial land uses (4 percent), schools (3 percent), and parks (10 percent) are in the range of both scenarios, while the percent of single-family residential land uses (37 percent) and industrial land uses (11 percent) exceed Scenario 1 but are within the range of Scenario 2. However, the percent of the SOIA Area potentially designated for office land uses (29 percent) exceed the range of both scenarios.

It is not known how closely the future land use designations for the SOIA Area would reflect those of the conceptual land use plan. Furthermore, a final General Plan Update land plan program scenario has not been selected; therefore, the proposed SOIA Area conceptual land use plan cannot be accurately compared to the City General Plan Update land use program scenarios. LAFCo has elected not to examine any alternative uses of the project site in detail.

4.2.4 ALTERNATIVE USE OF PROJECT SITE

A commenter suggested that the EIR consider development of the area for wildlife and farmland buffers dedicated to such uses in perpetuity. Such development could include commercial farming, eco-tourism, wildlife research, recreation, establishment of refuges, and agricultural education programs.

The proposed project does not propose any development or identify any specific areas for development. In the future, if annexation and development is proposed, the type of development would be under the jurisdiction of Elk Grove. However, this alternative would not meet the project purpose to “provide holding capacity for the City to be able to plan for employment opportunities and expanding population.” LAFCo has elected not to examine any alternative uses of the project site in detail.

4.2.5 ALTERNATE LOCATION ALTERNATIVE FOR FUTURE DEVELOPMENT

One potential alternative location would entail the expansion of the City of Elk Grove’s SOI to the northeast of the existing City limits and would encompass an area that is larger than the currently proposed SOIA Area. While this alternate location could provide holding capacity for the City to be able to plan for employment opportunities and an expanding population and to meet the project objective of a SOI, this area is under the planning jurisdiction of Sacramento County, which is currently processing specific plans and development applications, including the 2,650-acre Sacramento County Vineyard Springs Comprehensive Plan (County of Sacramento 2000) and a 2,550-acre area to the west that is bounded by Eagle Nest Road to the east, Excelsior Road to the west, Calvine Road to the south, and Grant Line Road to the southeast. Given the County’s ongoing planning activities in this area, this alternate location would not meet the project objectives related to amending the City’s SOI policy boundary. The Southeast Policy Area also encompasses an area that is larger than the currently proposed SOIA Area is located north and adjacent to the project site. The 1,200-acre Southeast Policy Area could meet the proposed project’s purpose to provide holding capacity for the City and to meet the proposed project objective to provide land to accommodate a jobs-housing ratio for the City of Elk Grove that provides for sufficient residential and employment-generating lands uses to minimize the need for commuting to or from other jurisdictions. However, the Southeast Policy Area is within the city limits and under the jurisdiction of the City of Elk Grove. Therefore, this alternate location would not meet any of the project objectives related to amending the SOI policy boundary.

Additional areas of vacant land abut the southern and southeast portion of the City of Elk Grove’s existing jurisdictional boundary. LAFCo has received applications to expand the City’s SOI to include the Bilby SOIA, which consists of 480 acres of land north of Kammerer Road, east of Willard Parkway, south of Bilby Road, and east of Bruceville Road; and the Multi-Sport Complex SOIA, which consists of 579 acres located south of Grant Line Road (near its intersection with New Waterman Road) and east of the Union Pacific Railroad tracks (east of State Route 99). Similar to the proposed project, the Bilby SOIA is a landowner-initiated proposal to amend the City of Elk Grove SOI and does not include any development proposal or propose any changes to land use; however, future development will be considered based on a proposed land use scenario. The Multi-Sports Complex SOIA is a proposal by the City to amend the City’s SOI for development of a multi-sport complex and residential, commercial, and industrial development. Therefore, The Bilby SOIA and Multi-Sports Complex SOIA areas could not be used as an alternate location for the proposed project.

LAFCo has elected not to examine any alternative locations of the project site in detail.

4.3 ALTERNATIVES CONSIDERED IN DETAIL IN THE EIR

This section provides a comparative analysis of the alternatives that were selected by LAFCo for detailed analysis in the EIR: Alternative 1: No-Project Alternative and Alternative 2: Reduced Size Alternative.

4.3.1 ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

CEQA Guidelines CCR Section 15126.6(e)(2) states that a discussion of the “No Project” alternative must consider “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans.”

The project site is zoned and designated by Sacramento County to be used for agriculture and the majority of the site is currently used for agriculture. Therefore, the No-Project Alternative for purposes of this analysis consists of continued agricultural use.

ABILITY OF ALTERNATIVE TO MEET PROJECT OBJECTIVES

This alternative would not meet the project objectives since it would not amend the SOI boundary beyond existing Elk Grove city limits to accommodate orderly and sustainable growth within which future annexation requests into the City of Elk Grove could be considered.

4.3.2 ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Instead of the 1,156-acre proposed SOIA Area, Alternative 2 is a reduced size alternative that would avoid the ditches as shown on Exhibit 4-1. The ditches may be sensitive for biological resources, including giant garter snake, and Sanford’s arrowhead (and other special-status plants). The SSCHP does not show modeled giant garter snake or western pond turtle habitat as occurring in or near the SOIA Area. In addition, the waters may be subject to federal protection under Section 404 of the CWA due to ultimate connectivity to the Sacramento-San Joaquin River Delta via South Stone Lake thence Snodgrass Slough; however, a jurisdictional determination has not been completed. Avoidance of the ditches would reduce the acreage of the proposed SOIA Area from approximately 1,200 acres to 530 acres, which is less than half the land area of the proposed project. If there is development in this alternative area, the reduced land area means that less foraging habitat for special status raptors (Swainson’s hawk, white-tailed kite, northern harrier, and burrowing owl) and common raptors protected under California Fish and Game Code and the MBTA would be converted.

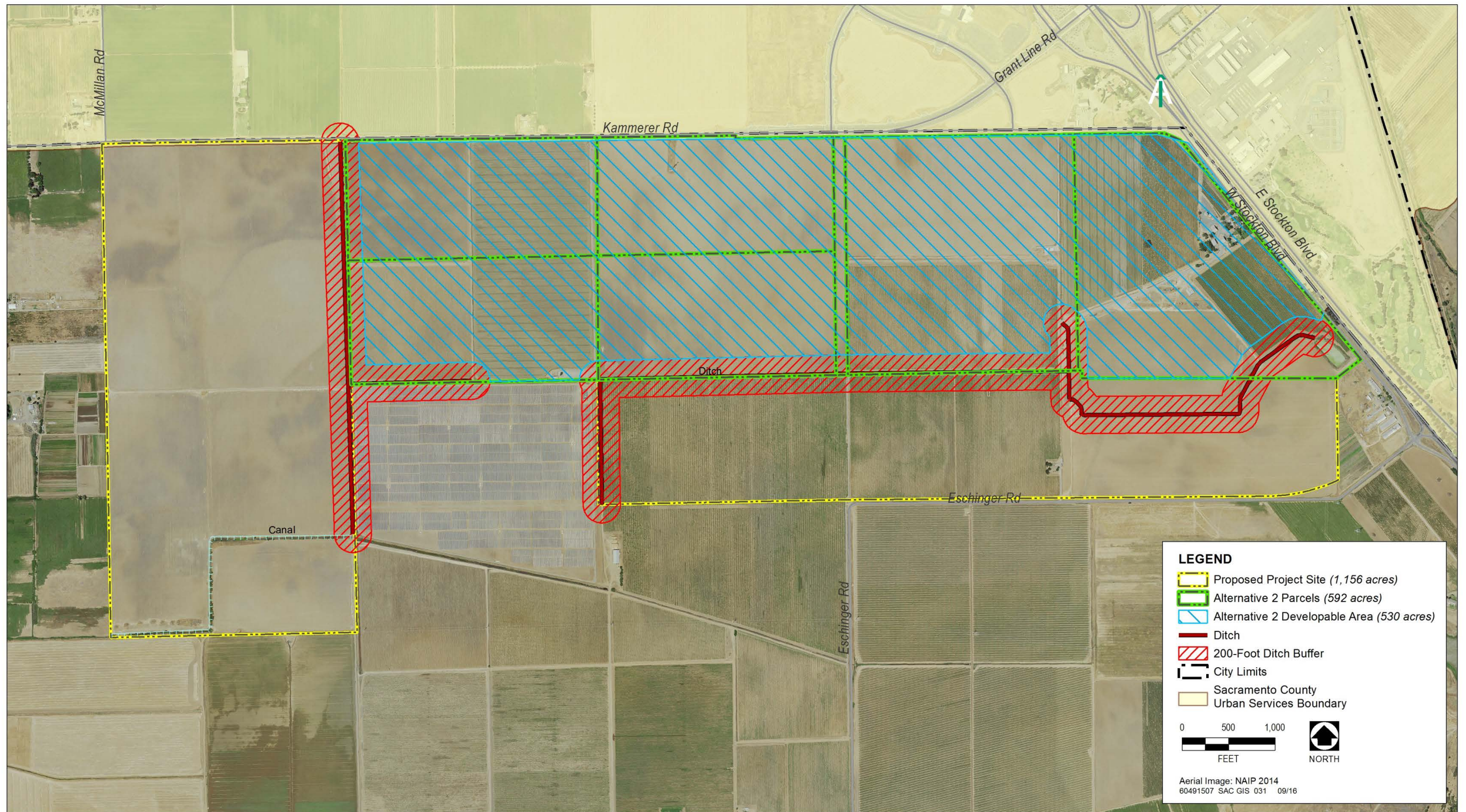
ABILITY OF ALTERNATIVE TO MEET PROJECT OBJECTIVES

This alternative could generally meet the project objectives, albeit potentially not to the same degree as the proposed project.

4.4 COMPARISON OF ALTERNATIVES

As described in Chapter 2 of this EIR, “Project Description,” the project does not propose any development or land use change, but this EIR uses a conceptual land use scenario in order to disclose possible future impacts if the SOIA Area were to develop. A similar approach is used for the comparison of alternatives to the proposed project. This EIR assumes that Alternative 2 could potentially develop with a similar mix of land uses as envisioned under the conceptual land use alternative for the proposed project.

Following is a comparison of the environmental effects of each alternative relative to the proposed project for each of the environmental topics examined in this EIR.



Source: AECOM 2016

Exhibit 4.1

Alternative 2 Reduced Size Alternative

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4.4.1 AESTHETICS

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.1-1:** Degrade the existing visual character of the project site or impact scenic vistas
- ▶ **Impact 3.1-2:** Create light or glare

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. It is likely that no visual change would occur, or that any future activities permitted under the zoning and designation such as the construction of minor outbuildings or farming facilities or changes in agricultural operations would not entail a significant change in the visual character of the project site. No damage to scenic vistas or scenic resources within a state scenic highway would occur. There would be no additional sources of light or glare. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Therefore, this alternative would have reduced impacts on aesthetics compared to the proposed project. No impact would occur.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Alternative 2 is less than half the size of the proposed project. As such, if there were urban development within this alternative area, the type of aesthetics impacts would be similar to those of the proposed project, but the level of impact would be reduced. However, if this alternative area was developed, this would still represent a substantial change in the existing visual character of the project site from agricultural uses to urban development. In addition, just as with the proposed project, Alternative 2 would bring sources of nighttime lighting and could allow for facilities with reflective surfaces that could cause glare. This would increase ambient nighttime lighting and daytime glare in the vicinity of the project. However, with the substantial reduction in the project size, aesthetics impacts would be reduced compared to the proposed project.

4.4.2 AGRICULTURAL RESOURCES

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.2-1:** Direct loss of agricultural land, including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance or Farmland under Williamson Act Contract
- ▶ **Impact 3.2-2:** Indirect loss of adjacent agricultural land, including Prime Farmland, Unique Farmland, or Farmland of Local Importance or Lands Under Williamson Act Contract

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agriculture. No direct or indirect loss of agricultural land would occur. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Therefore, this alternative would have reduced impacts compared to the proposed project. No impact would occur.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Alternative 2 would likely result in less urbanization and associated direct conversion of agricultural land, including Important Farmland as shown in Table 4-1. The reduction in land area would allow expansion of the SOI into areas with Prime Farmland, Farmland of Statewide Importance, and Unique Farmland in the western and southern portions of the proposed SOIA Area. This alternative would not avoid impacts to lands with Williamson Act contracts, since none occurs in the proposed SOIA Area. In addition, this alternative would increase the distance between development and adjacent agricultural lands, including Important Farmland and Williamson Act contracts, which could protect the agricultural lands from indirect conversion. Impacts would be reduced compared to the proposed project.

Alternative	Classification	Acres
Alternative 2	Farmland of Local Importance	215.9
	Farmland of Statewide Importance	240.1
	Other Land	8.5
	Prime Farmland	58.7
	Urban and Built-Up Land	6.3
Alternative 2 Total		529.5

4.4.3 AIR QUALITY

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.3-1:** Short-term construction emissions of criteria air pollutants and precursors
- ▶ **Impact 3.3-2:** Long-term operational emissions of criteria air pollutants and precursors
- ▶ **Impact 3.3-3:** Exposure of sensitive receptors to substantial pollutant concentrations
- ▶ **Impact 3.3-4:** Exposure of sensitive receptors to emissions of odors

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agriculture. Existing air pollutant emissions associated with agricultural activities would still occur. However, since no construction or development would occur, the amount of construction -related air pollutants that would be generated would be substantially reduced as compared to the proposed project. It is possible that there could be temporary emissions associated with maintenance activities or construction of new agriculture-related structures on-site. Operational generation of criteria air pollutants and precursors, as well as toxic air contaminants, would also be reduced compared to the proposed project. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, the air quality impacts would be reduced compared to the proposed project. Impacts would be less than significant under this alternative.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Alternative 2 would facilitate a reduced amount of development compared to the proposed project. Just as with the proposed project, construction of Alternative 2 would involve the temporary and short-term generation of criteria air pollutants and precursors, as well as toxic air contaminant emissions resulting construction activities.

Due to the reduced land area, if there is development in the future in the Alternative 2 area, the total amount of daily air pollutant emissions would be reduced relative to the proposed project. Although the timing and type of future development is unknown and could still exceed the applicable significance thresholds, air quality impacts would be reduced compared to the proposed project.

4.4.4 BIOLOGICAL RESOURCES

The proposed project was found to have the following significant and unavoidable impact:

- ▶ **Impact 3.4-2:** Special-status raptors and other nesting raptors

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. It would continue to be nesting and foraging habitat for special status raptors (Swainson’s hawk, white-tailed kite, northern harrier, and burrowing owl) and common raptors protected under California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Property owners would still be required to comply with Sections 1602, 3503, 3511, 4700, 5050, and 5515 of the California Fish and Game Code, which prohibit diversion or obstruction of streamflow and streambeds, prohibit “take”¹ of protected species (including raptors), and prohibit destruction of nests or eggs of any bird. Property owners would also still be required to comply with Section 404 of the Federal Clean Water Act, which requires that a permit be obtained from the U.S. Army Corps of Engineers before engaging in any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. Finally, the Federal Endangered Species Act (16 U.S.C. Section 1531 et seq.) prohibits private parties from engaging in any activity that may result in “take” of a species listed as threatened or endangered. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, impacts would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

As with the proposed project, if there is future development, Alternative 2 could adversely affect special-status plants and habitat for special-status species. Impacts related to the loss and degradation of habitat for special-status wildlife and plant species would be similar in type, although they would be reduced due to the smaller acreage. Alternative 2 would focus development away from sensitive canals and ditches that could accommodate giant garter snake, Sanford’s arrowhead (and other special-status plants), and western pond turtle. If there is development in this alternative area, the reduced land area means that less foraging habitat for special status raptors (Swainson’s hawk, white-tailed kite, northern harrier, and burrowing owl) and common raptors protected under California Fish and Game Code and the MBTA would be converted. Thus, impacts would be reduced compared to the proposed project but likely would still be significant for protected raptors.

¹ “Take” is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” The U.S. Fish and Wildlife Service has also interpreted the definition of “harm” to include substantial habitat modification that could result in take.

4.4.5 CULTURAL RESOURCES

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.5-2:** Substantial adverse change to undiscovered historical resources or unique archeological resources

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agriculture. If cultural materials are unearthed, they would be subject to regulations protecting cultural resources. Because Alternative 1 would entail continuing agricultural uses, a very small amount of earth-moving activities would occur as compared to the proposed project. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Therefore, the potential for adverse impacts to cultural resources would be reduced compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Since Alternative 2 is reduced in land area, the amount of ground moving activities and the associated potential to unearth cultural materials would be similarly reduced if future development were to occur. Cultural materials would be subject to regulations protecting cultural resources. Therefore, the *potential* for adverse impacts to cultural resources would be reduced compared to the proposed project, but since it is not possible to know whether or not there are subsurface resources that could be affected if there was development in the Alternative 2 area, it is not possible to determine at this time whether actual impacts would be reduced relative to the proposed project. Because this alternative would result in similar potential to unearth cultural resources if development were to occur and would be subject to similar regulations protecting cultural resources, it would have impacts on cultural resources similar to the proposed project.

4.4.6 ENERGY

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.6-1:** Energy efficiency
- ▶ **Impact 3.6-2:** New or expanded electrical and natural gas utilities

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Energy requirements would be similar to existing conditions and the impact would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Since Alternative 2 would be reduced in size compared to the proposed project, energy demands would likely be similarly reduced. The location of the Alternative 2 area relative to the proposed project site is the same as the

proposed SOIA Area and therefore would produce similar results if it were to be developed relative to the efficiency of transportation energy demand. Similarly, if there is development in the Alternative 2 area, this development would be subject to the same State building energy efficiency requirements as would occur under the proposed project. The impact would be similar to the proposed project.

4.4.7 GEOLOGY, SOILS, MINERALS, AND PALEONTOLOGICAL RESOURCES

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Impacts geology, soils, minerals, and paleontological resources would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Under Alternative 2, less development would occur. The same regulations related to site preparation and the construction of buildings, including the California Building Code, which provides minimum standards for building design throughout California, would apply under this alternative. Alternative 2 also has the potential to contain paleontological resources. Although the amount of ground moving activities and the associated potential to unearth paleontological resources would be reduced, it is not possible to know whether or where subsurface resources are within the Alternative 2 area. Thus, impacts would be similar to the proposed project.

4.4.8 GREENHOUSE GAS EMISSIONS

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.8-1:** Contribution to significant climate change cumulative impact

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. It is possible that there could be temporary greenhouse gas (GHG) emissions associated with maintenance activities or construction of new agriculture-related structures on-site. Livestock and fertilizer application are sources of GHG emissions. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Although agricultural operations produce some GHG emissions, the ongoing agriculture on-site would generate fewer GHG emissions compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Since Alternative 2 would be reduced in land area compared to the proposed project, if there is development in the Alternative 2 area in the future, both short-term and long-term GHG emissions would likely be similarly reduced. It is not known what land use, transportation, pricing, or design strategies would be incorporated under Alternative 2, and therefore not possible to know the rate of GHG emissions relative to the proposed project.

However, it is reasonable to assume that the total GHG emissions would be reduced compared to the proposed project.

4.4.9 HAZARDS AND HAZARDOUS MATERIALS

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. Any activity would be required to comply with applicable building, health, fire, and safety codes. No construction would occur that would require road closures that would interfere with an emergency response or evacuation plan. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, impacts would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Similar to the proposed project, hazardous materials, such as fuels, oils and lubricants, paints, glues, and cleaning fluids, could be required for future development under Alternative 2, although the amount of development would be reduced. Facilities that would use hazardous materials on site after any future development and any off-site improvements are constructed would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The storage, use, disposal, and transport of hazardous materials are extensively regulated by various federal, State, and local agencies, and therefore construction companies and businesses (during the operational phase) that would handle any hazardous substances would be required by law to implement and comply with these existing hazardous-materials regulations. Construction of subsequent projects under this alternative would be required to comply with applicable building, health, fire, and safety codes, as described for the proposed project. Although Alternative 2 would likely result in less development, the timing is not known. Thus, Alternative 2 could also require road closures which would interfere with emergency response or evacuation plans and impacts would be similar compared to the proposed project.

4.4.10 HYDROLOGY AND WATER QUALITY

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.10-2:** Depletion of groundwater supplies

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural production. The project area is currently used for dry farming and irrigated croplands, as well as vineyard operations. Agricultural production—which would allow the use of fertilizers and pesticides—could affect water quality. Based on California crop information and estimated amount of water applied to each crop type, the SOIA Area is estimated to use over 597 million gallons of water a year (See Section 3.10 of this EIR, “Hydrology and Water Quality”). Although, depending on crop types and agricultural practices, existing water demand could be considerable, if the SOIA Area were to develop as contemplated under the conceptual land use scenario, this would increase water demand on-site relative to the existing environment. While under the proposed project, the future water supply could involve a conjunctive-use water supply, under Alternative 1, it is assumed water supply

would continue to be exclusively groundwater. It is possible that, should agricultural uses continue, there would be the need to maintain or construct new irrigation or drainage facilities on-site or conduct other potentially earth-disturbing activities that could affect water quality. However, the level of construction anticipated under the conceptual land use scenario for the proposed project is assumed to exceed that which would occur under Alternative 1. Alternative would not substantially change impacts related to long-term water quality compared to baseline conditions since it would not result in increased impervious surfaces and urban stormwater runoff. The same is true with regard to potential groundwater recharge impacts – since Alternative 1 would not add any significant amount of impervious surface, and would, therefore, not impact groundwater recharge. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Since Alternative 1 would not add housing or other occupied uses, it would not result in any impact related to flood risk. Overall, the impact would be reduced compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

As with the proposed project, Alternative 2 would affect long-term water quality due to increased impervious surfaces and urban stormwater runoff. Construction and grading activities have the potential to cause temporary and short-term increased erosion and sedimentation and increase pollutant loads in stormwater runoff. Development could involve substantial earth-disturbing activities (e.g., cut and fill, vegetation removal, grading, trenching, movement of soil) that could expose disturbed areas and stockpiled soils to winter rainfall and stormwater runoff. With the substantial reduction in the land area under Alternative 2, the level of temporary, construction-related impacts could be reduced ~~under Alternative 2~~ compared to the proposed project. In addition, Alternative 2 would reduce the amount of impervious surfaces added on-site compared to the proposed project and therefore would decrease the peak discharge flow and rate of stormwater runoff generated on the project site. No portion of Alternative 2 is within the 100-year or 500-year floodplain. Impacts would be reduced compared to the proposed project.

4.4.11 LAND USE, POPULATION, HOUSING, EMPLOYMENT, ENVIRONMENTAL JUSTICE, AND UNINCORPORATED DISADVANTAGED COMMUNITIES

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.11-4:** Consistency with the SACOG 2036 Metropolitan Transportation Plan/Sustainable Communities Strategy
- ▶ **Impact 3.11-5:** Conversion of open space
- ▶ **Impact 3.11-6:** Induce population growth

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. The continued use of the project site for agricultural production would not impact land use and planning, population, housing, or employment. It would not conflict with any applicable land use or habitat conservation plan, displace people or housing, induce population growth, or divide an established community. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure

improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Impacts would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Similar to the proposed project, Alternative 2 could induce population growth, although to a lesser extent. Development of housing, infrastructure, and facilities and services to serve this growth could have significant environmental impacts through land conversions, commitment of resources, and other mechanisms. In addition, Alternative 2 would have similar consistency issues compared to the proposed project. Alternative 2 would convert less open space but if it were to develop with the same ratio of land uses as the proposed project, may create fewer opportunities to improve the jobs-housing balance. However, this alternative could also possibly reduce or eliminate the residential component and maintain the same level of employment opportunity – since neither the proposed project nor Alternative 2 propose any land use change, it is not possible to determine the relative impacts of this alternative and the proposed project. But, overall, impacts would be reduced compared to the proposed project.

4.4.12 NOISE AND VIBRATION

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.12-1:** Temporary, short-term exposure of sensitive receptors to construction noise
- ▶ **Impact 3.12-3:** Temporary, short-term exposure of sensitive receptors to potential groundborne noise and vibration from project construction
- ▶ **Impact 3.12-4:** Long-term traffic noise levels at existing noise-sensitive receivers
- ▶ **Impact 3.12-5:** Land use compatibility of on-site sensitive receptors with future traffic noise levels
- ▶ **Impact 3.12-6:** Land use compatibility of on-site sensitive receptors to or generation of non-transportation noise levels in excess of local standards

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. Noise associated with the use of agricultural equipment would continue on the project site and could potentially increase or change in type, depending on any changes in agricultural activities including a change in crops or farming techniques, or other activities that would be permitted under the current zoning and designations. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. There would be no increase in noise or vibration. Thus, impacts would be reduced compared to the proposed project. No impact would occur.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Under Alternative 2, the same types of construction equipment would be used, but for less time compared to the proposed project, given the substantially reduced project site. In addition, operational noise impacts would be reduced since, if there is development of the Alternative 2 area, it would likely be a reduced amount of

development compared with the proposed project. Thus, impacts would be reduced compared to the proposed project.

4.4.13 PUBLIC SERVICES AND RECREATION

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.13-1:** Increased demand on fire protection and emergency medical services
- ▶ **Impact 3.13-2:** Increased demand for law enforcement services

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. There would be no increased demand on fire protection, emergency medical, or law enforcement services. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, impacts would be reduced compared to the proposed project. The two significant effects of the proposed project would be less than significant under the No-Project Alternative.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Since Alternative 2 would reduce the development potential on-site, the law enforcement, fire protection, public school services, and parks and recreational services needs would be proportionally reduced compared with the proposed project. However, it cannot be determined if or when the increased demand for services would require the expansion of construction of new facilities, the construction of which could cause environmental impacts. Thus, impacts would be similar compared to the proposed project.

4.4.14 TRANSPORTATION AND TRAFFIC

The proposed project was found to have the following significant and unavoidable impact:

- ▶ **Impact 3.14-1:** Conflict with an applicable transportation plan, ordinance, policy, or congestion management program

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agricultural uses. If agricultural operations continue consistent with existing operations, no increase in traffic would occur and no conflicts with transportation-related policies would occur. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, impacts would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Relative to conflicts with transportation-related policies, since neither Alternative 2 nor the proposed project have any specificity at this time on transportation planning or design, it is not possible to determine whether or not there would be conflicts that would arise that would represent significant adverse physical environmental effects.

Under Alternative 2, less development would occur. Since travel demand is typically determined based on the size and type of development proposed, the traffic and transportation effects would be reduced under this alternative relative to the proposed project. Impacts would be reduced compared to the proposed project.

4.4.15 UTILITIES AND SERVICE SYSTEMS

The proposed project was found to have the following significant and unavoidable impacts:

- ▶ **Impact 3.15-1:** Increased demand for water supplies and water system facilities
- ▶ **Impact 3.15-2:** Increased demand for wastewater collection, conveyance, and treatment facilities

ALTERNATIVE 1: NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the project site would likely continue to be used for agriculture. There would be no increased demand for utilities and services. Although, depending on crop types and agricultural practices, existing water demand could be considerable, if the SOIA Area were to develop as contemplated under the conceptual land use scenario for the proposed project, this would increase water demand on-site relative to the existing environment. Alternative 1 would not involve any off-site changes and therefore would not have any effects related to possible off-site infrastructure improvements that could be required if the conceptual land use scenario for the proposed project is implemented. Thus, impacts would be reduced to less than significant compared to the proposed project.

ALTERNATIVE 2: REDUCED SIZE ALTERNATIVE

Under Alternative 2, annexation would be required to the Sacramento ~~Area Sewer District~~ County Water Agency and Sacramento County Regional Sanitation District service area. Also Sacramento County Water Agency service area boundary would require change to encompass the project site. Although Alternative 2 would result in less future development and associated demand for utilities, it cannot be determined if or when the increased demand for services would require the expansion of construction of new facilities, the construction of which could cause environmental impacts. Thus, impacts would be similar compared to the proposed project.

4.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Alternative 1: No Project Alternative would be the Environmentally Superior Alternative, as shown in Table 4-6. This alternative provides the greatest opportunity for reduction in environmental effects of the proposed project. Alternative 2 would provide the most reduction in environmental effects compared to the proposed project.

Table 4-2. Comparison of Significant Environmental Effects of the Alternatives to the Proposed Project

Environmental Issue Area	Alternative 1: No-Project Alternative (No Development)	Alternative 2: Reduced Size Alternative
Aesthetics	Reduced	Reduced
Agricultural Resources	Reduced	Reduced
Air Quality	Reduced	Reduced
Biological Resources	Reduced	Reduced
Cultural Resources	Reduced	<u>Reduced</u> Similar
Energy	Reduced	<u>Reduced</u> Similar
Geology, Soils, Minerals, and Paleontological Resources	Reduced	<u>Reduced</u> Similar
Greenhouse Gas Emissions	Reduced	Reduced
Hazards and Hazardous Materials	Reduced	<u>Reduced</u> Similar
Hydrology and Water Quality	Reduced	Reduced
Land Use, Population, Housing, Employment, Environmental Justice, and Unincorporated Disadvantaged Communities	Reduced	Reduced
Noise and Vibration	Reduced	Reduced
Public Services and Recreation	Reduced	<u>Reduced</u> Similar
Transportation and Traffic	Reduced	Reduced
Utilities and Service Systems	Reduced	<u>Reduced</u> Similar
Total Reduced Impact Topics	15	9

Note: Some environmental issue areas are split into subsections. In this case, if any of the subsections had reduced or increased impacts, the entire environmental issue is shown as reduced or increased (even if another subsection had similar impacts).

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