
7.0 PROJECT ALTERNATIVES

7.1 INTRODUCTION

This chapter evaluates potential alternatives to the proposed Project as required by the California Environmental Quality Act (CEQA). The alternatives selected for detailed analysis represent a reasonable range of alternatives that could feasibly attain most of the Project's basic objectives and that could avoid or substantially lessen significant impacts. This chapter presents the CEQA requirements for alternatives analysis, a summary of the selected alternatives, an overview of the proposed Project's potentially significant impacts, an evaluation of the alternatives, a comparison of the merits of the alternatives, selection of the environmentally superior alternative, and a summary of Project options that were considered but not included for evaluation in the environmental impact report (EIR).

CEQA REQUIREMENTS FOR ALTERNATIVES ANALYSIS

CEQA Guidelines Section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any significant adverse environmental effects of that project.

An EIR is not required to consider every conceivable alternative to a proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines Section 15126.6(e) states that "[t]he specific alternative of 'no project' shall also be evaluated along with its impact." The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Specifically, the CEQA Guidelines set forth the following criteria for selecting and evaluating alternatives:

[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (CEQA Guidelines Section 15126.6[c]).

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).

The specific alternative of "no project" shall be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The CEQA Guidelines also require that the "no project" analysis "shall discuss the existing conditions at the time the [EIR] notice of preparation is published ... as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans..." (CEQA Guidelines Section 15126.6[e][1] and [2]).

7.0 PROJECT ALTERNATIVES

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 (Section 15126.6[f]).

When addressing feasibility, CEQA Guidelines Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative.

The primary intent of the alternatives analysis is to disclose other ways that the objectives of the Project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed Project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the Public Resources Code and the CEQA Guidelines direct that the EIR need “set forth only those alternatives necessary to permit a reasoned choice.”

PROJECT OBJECTIVES

CEQA Guidelines Section 15124 requires that a project description be accompanied by a “statement of objectives sought by the proposed project.” The guidelines go on to state that the “objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

The City has identified the following objectives for the proposed Project:

1. Provide for growth of the City to meet long-term needs, including housing, employment, and recreational opportunities.
2. Facilitate orderly and logical development, including economic development, while maintaining the character of existing communities.
3. Provide an improved transportation system that includes an array of travel modes and routes, including roadways, mass transit, walking, and cycling.
4. Protect open space, providing trails, parkland, and a range of recreational opportunities.
5. Provide mechanisms to minimize noise and safety risks associated with natural and human-caused noise and safety hazards.
6. Promote sustainability and community resiliency through reductions in vehicle miles traveled, improved air quality, reductions in energy usage, and a diversified economy.
7. Provide and support public facilities and infrastructure with sufficient capacity to adequately serve the needs of the growing community.

7.2 OVERVIEW OF THE PROPOSED PROJECT'S SIGNIFICANT IMPACTS

As described above, the selected alternatives are those that would reduce or avoid significant environmental impacts associated with the Project as proposed. The following is a list of the Project's potentially significant, significant, and cumulatively considerable impacts, including impacts that would be unavoidable because mitigation would not reduce the impacts to less than significant or no feasible mitigation measures are available.

AESTHETICS, LIGHT, AND GLARE

Project-Specific

- 5.1.2 Implementation of the General Plan will encourage new development and redevelopment activities that could degrade the existing visual character or quality of the Planning Area.
- 5.1.3 Implementation of the General Plan would create new sources of daytime glare, and would change nighttime lighting and illumination levels associated with new and redevelopment activities in the Planning Area, which would contribute to skyglow.

Cumulative

- 5.1.4 Implementation of the proposed Project, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas that would have a cumulatively considerable contribution to impacts on visual character.
- 5.1.5 Implementation of the proposed Project, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas, increasing nighttime lighting and daytime glare and contributing to regional skyglow.

AGRICULTURAL RESOURCES

Project-Specific

- 5.2.1 Implementation of the proposed Project would allow for new development in areas of the Planning Area that are designated Important Farmland and/or under Williamson Act contract.

Cumulative

- 5.2.3 Implementation of the proposed Project would ultimately result in the conversion of Important Farmland and the cancellation of Williamson Act contracts. This loss would contribute to the cumulative loss of farmland in the region.

7.0 PROJECT ALTERNATIVES

AIR QUALITY

Project-Specific

- 5.3.1 Buildout of the proposed Project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards for ozone, PM₁₀, and PM_{2.5}.
- 5.3.2 The Project could result in long-term operational emissions that could violate or substantially contribute to a violation of federal and State standards for ozone and coarse and fine particulate matter.
- 5.3.4 The proposed Project could result in increased exposure of existing or planned sensitive land uses to stationary or mobile-source TACs that would exceed applicable standards.
- 5.3.5 Implementation of the Project would not result in increased exposure of sensitive receptors to odorous emissions as compared to baseline conditions.
- 5.3.6 The Project would be substantially consistent with all applicable control measures in the Sacramento Regional NAAQS 8-Hour Ozone Attainment and Further Progress Plan (Attainment Plan), but because the Project would exceed the SMAQMD's air quality thresholds of significance, the Project would not be considered to be fully consistent with the Plan's goals.

Cumulative

- 5.3.7 The proposed Project in combination with growth throughout the air basin will exacerbate existing regional problems with criteria air pollutants and ozone precursors.

BIOLOGICAL RESOURCES

Project-Specific

- 5.4.1 Implementation of the proposed Project could result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plants and wildlife.
- 5.4.2 Implementation of the proposed Project could result in adverse effects, either directly or indirectly, on non-listed special status species (Species of Special Concern, fully protected, and locally important).

Cumulative

- 5.4.7 Future development in the Planning Area, when considered together with other past, existing, and planned future projects, could result in a significant cumulative impact on biological resources in the region.

CULTURAL RESOURCES

None identified.

GEOLOGY, SOILS, MINERAL RESOURCES, AND PALEONTOLOGY

None identified.

GREENHOUSE GAS EMISSIONS AND ENERGY

Cumulative

5.7.2 Adoption of the proposed General Plan and CAP Update would result in emission reductions that are consistent with statewide reduction targets for 2020 and 2030. However, based on current emission estimates for the City projected for 2050, and considering the proposed policies and programs included in the General Plan and CAP Update, the proposed General Plan and CAP Update would likely not result in sufficient GHG reductions for the City to meet the longer-term goal for 2050 as stated in EO S-3-05.

HAZARDS AND HAZARDOUS MATERIALS

None identified.

HYDROLOGY AND WATER QUALITY

Project-Specific

5.9.4 The proposed Project would increase the demand on water supplies, some of which would be groundwater.

Cumulative

5.9.7 Development of the Planning Area, in combination with other development in the Central Basin, would increase demand for groundwater and could potentially interfere with recharge of the aquifer.

NOISE

Project-Specific

5.10.2 Implementation of the proposed Project would result in a significant increase in transportation noise, including traffic noise levels along many existing roadways in the City. Even with implementation of proposed policies to limit traffic noise impacts, predicted traffic noise levels would still result in potential increases above applicable standards.

7.0 PROJECT ALTERNATIVES

Cumulative

- 5.10.5 Implementation of the proposed Project would contribute to cumulative noise levels along many roadway segments in the Planning Area due to increased cumulative traffic volumes.

PUBLIC SERVICES AND RECREATION

Project-Specific

- 5.11.3.1 Implementation of the proposed Project would allow for future development in the Planning Area, which would result in an increase of school-aged children and require the construction of new public school facilities, the construction of which could have impacts on the physical environment.

Cumulative

- 5.11.3.2 Implementation of the proposed Project, in combination with other development in the EGUSD service area, would result in the increase of school-aged children, which would require the construction of new public school facilities, which could have impacts on the environment.

PUBLIC UTILITIES

Project-Specific

- 5.12.1.1 Implementation of the proposed Project would increase demand for domestic water supply, which may result in the need for additional water supplies.
- 5.12.1.2 Implementation of the proposed Project would require the construction of new and expanded water supply infrastructure, which could result in impacts to the physical environment.

Cumulative

- 5.12.1.3 Implementation of the proposed Project, in combination with other development, would contribute to cumulative demand for domestic water supply.
- 5.12.2.3 Implementation of the proposed Project, in addition to other development in the Regional San service area, would generate new wastewater flows requiring conveyance and treatment.

TRANSPORTATION

Project-Specific

The traffic analysis was based on a scenario in which development under the proposed Project was added to the existing condition with background levels of traffic included. See cumulative impacts.

Cumulative

- 5.13.1 Implementation of the proposed Project could cause unacceptable level of service conditions at some intersections and on some roadway segments.
- 5.13.2 Implementation of the proposed Project would exacerbate unacceptable (LOS F) conditions on SR 99 and I-5.
- 5.13.3 Implementation of the proposed Project would result in increased VMT.

7.3 ALTERNATIVES

ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

Alternatives may be removed from further consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any environmental effects (CEQA Guidelines Section 15126.6[c]). Additionally, alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, also do not need to be considered (CEQA Guidelines Section 15126[f][2]). The City considered several alternatives that ultimately were determined infeasible and these alternatives were removed from further consideration. These alternatives included the following:

Alternative Location/Off-Site Alternative

The General Plan Update addresses areas within the City and potential expansion areas directly adjacent to City boundaries that are in Sacramento County. It addresses planning changes within the City and Study Areas, some of which are in ongoing planning processes by the City and private parties and may be added to the City’s Sphere of Influence. Consideration of lands beyond the identified Study Areas is infeasible because of existing municipal boundaries, natural features, or Local Agency Formation Commission (LAFCo) regulations, which discourage planning of areas that are discontinuous with existing boundaries. Thus, the areas available for planning are inherently limited. Any alternatives involving alternative or off-site areas are infeasible and not addressed in the EIR.

Reduced Density/Intensity Alternative

The City considered a reduced density alternative that would result in fewer residences and less office space, which would reduce community impacts such as air quality, greenhouse gas (GHG) emissions, traffic, noise, and demand for utilities and public services. However, such an alternative would not achieve or would only partially achieve General Plan objectives of providing for growth of the City, providing an improved transportation system, and reducing vehicle miles traveled (VMT). Further, such an alternative would not be consistent with regional planning and could increase development pressure in other areas. Therefore, this option was not evaluated in the EIR.

ALTERNATIVES SELECTED FOR ANALYSIS

The selection of alternatives considered the alternatives’ ability to meet most of the project objectives as well as avoid or substantially lessen the project’s significant effects. Five alternatives, including the no project alternative, were identified for evaluation and comparison to the proposed project, as listed below.

7.0 PROJECT ALTERNATIVES

- Alternative 1 – No Project Alternative
- Alternative 2 – Additional Climate Action Plan Measures
- Alternative 3 – Reduced Study Areas
- Alternative 4 – Increased Development Intensity Alternative
- Alternative 5 – Increased Employment Alternative

The environmental effects of each of these alternatives are identified and compared with those resulting from the proposed Project. A table at the end of this section summarizes the comparisons and, per CEQA Guidelines Section 15126.6(e)(2), an “environmentally superior” alternative is identified. The selected alternatives are described below.

Alternative 1 – No Project Alternative

The No Project Alternative assumes implementation of the existing General Plan (2003) instead of the proposed General Plan Update. Under this alternative, the existing General Plan land uses would remain in place and development in the City would occur as anticipated in the 2003 General Plan, with an emphasis on carefully managed growth and buildout of the Southeast Policy Area (SEPA).

Alternative 2 – Additional Climate Action Plan Measures

Under this alternative, the City would adopt additional measures in the Climate Action Plan (CAP) that would further exceed established GHG reduction targets for 2020 and 2030 and allow the City to meet the State’s targets for 2050. The Draft EIR concludes that GHG emissions are a less than significant impact for 2020 and 2030, but a significant and unavoidable impact for 2050 due to uncertainty regarding the availability of measures to reach 2050 emissions reduction targets. Additional measures may include, but are not limited to, CALGreen Tier 1/NetZero by 2020, additional transportation sector measures, a direct offset program, and other emissions reduction options discussed as part of the Project but not included in the proposed CAP.

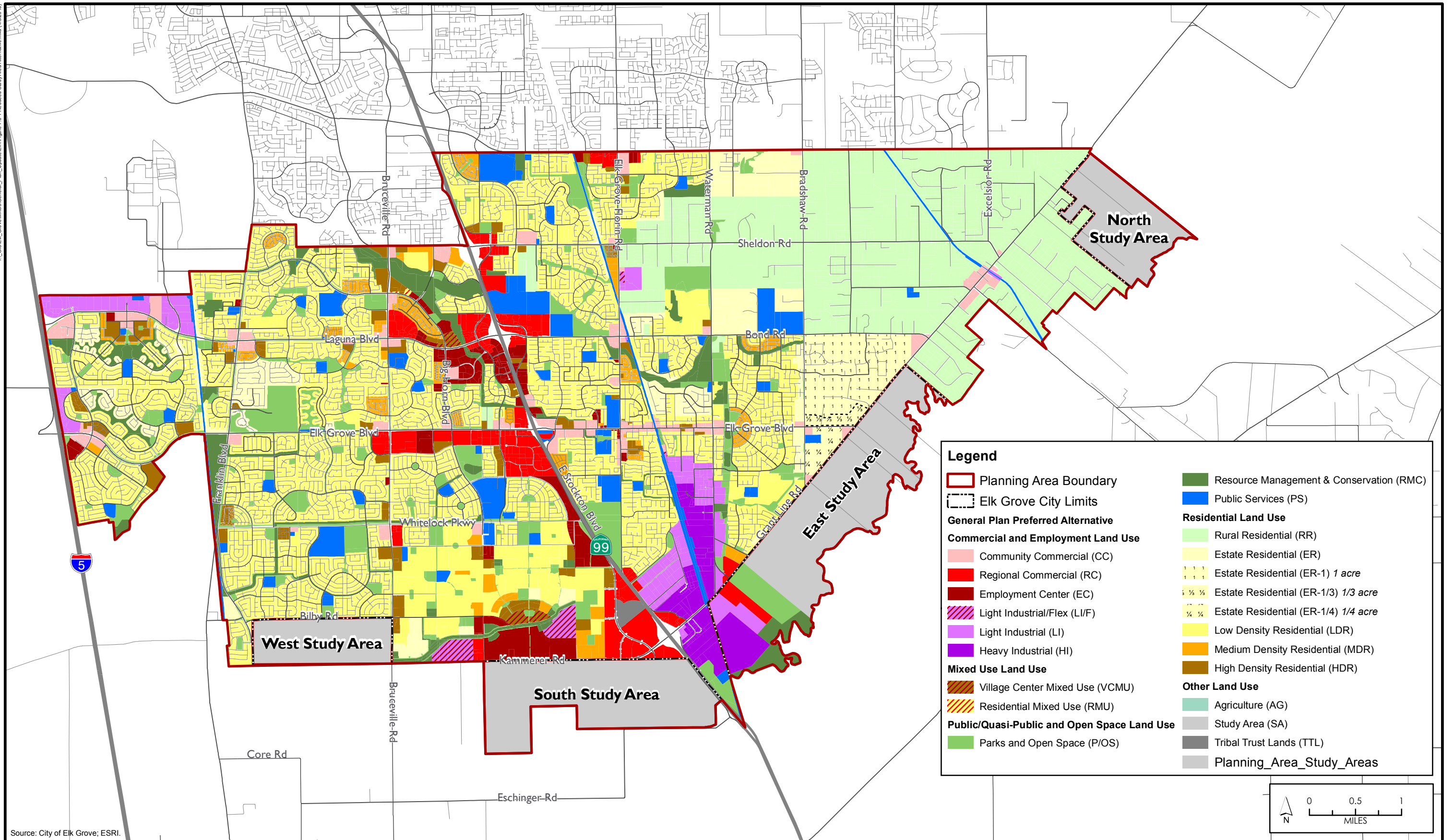
Alternative 3 – Reduced Study Areas

This alternative reduces the extent of the Study Areas to those areas within the existing Sacramento County Urban Services Boundary (USB) as well as the area included in the Kammerer/99 Sphere of Influence Amendment that was filed by a private developer for the area south of Kammerer Road and west of State Route (SR) 99 (**Figure 7.0-1**). This would result in a reduction in the size of the West and South Study Areas by 2,502 acres and 1,436 acres, respectively, for a total reduction in the Planning Area of 3,938 acres. The East and North Study Areas would remain the same with this alternative as with the proposed Project.

Alternative 4 – Increased Development Intensity Alternative

This alternative increases the allowable residential density and nonresidential development intensity for selected key sites around the City, as shown on **Figure 7.0-2**. In addition, the land use designations for several additional sites would be changed from Low Density Residential (LDR) to High Density Residential (HDR) or other land use designations for this alternative. HDR sites 1 through 6 on **Figure 7.0-2**, which total approximately 67 acres, would be changed to the HDR land use designation under the Increased Development Intensity Alternative. The land use designations for the remaining sites shown on **Figure 7.0-2** would be changed as shown in **Table 7.0-1**.

T:\GIS\Elk_Grove\MXD\General_Plan_Update\ER\Figure 7.0-1 Reduced Study Area Alternative.mxd (4/6/2018)



Source: City of Elk Grove; ESRI.



City of Elk Grove
Development Services

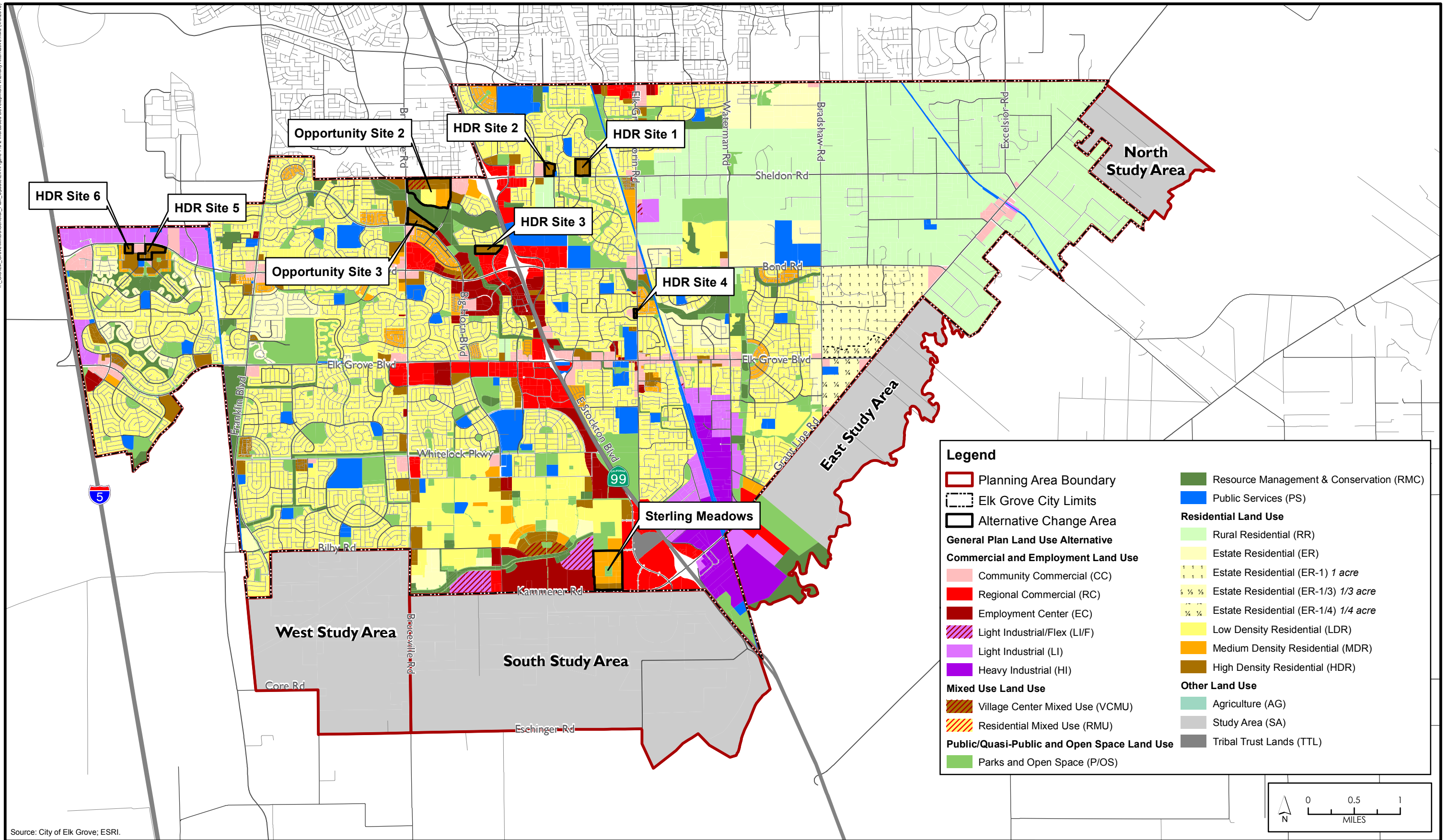
Figure 7.0-1

Reduced Study Area Alternative

7.0 PROJECT ALTERNATIVES

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T:\GIS\ELK_Grove\GIS\General_Plan_Update\EIR\Figure 7.0-2 Increased Development Intensity Alternative.mxd (4/9/2018)



Source: City of Elk Grove; ESRI.

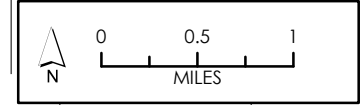
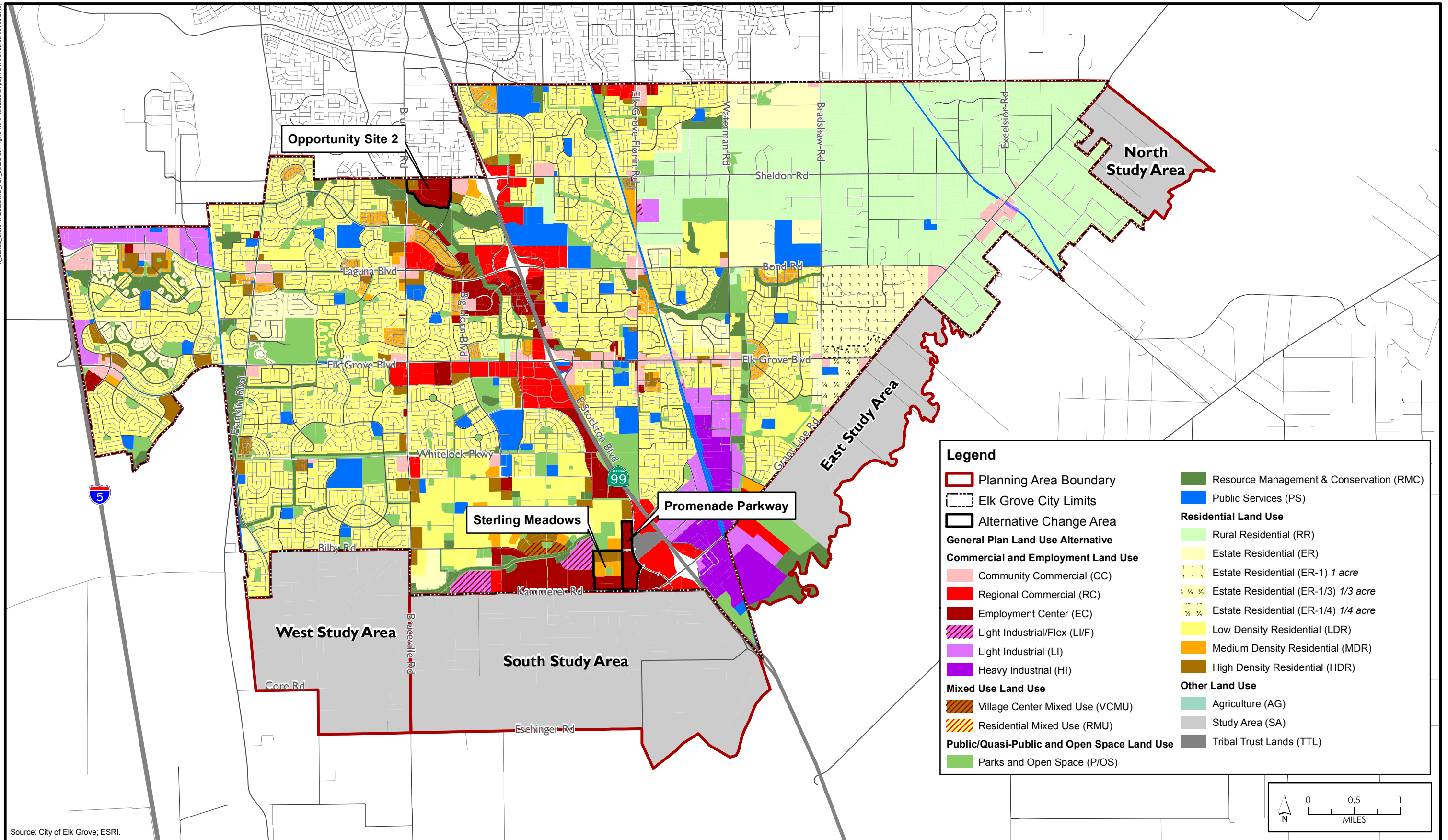


Figure 7.0-2
Increased Development Intensity Alternative

7.0 PROJECT ALTERNATIVES

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T:\GIS\Elk_Grove\MXD\General_Plan_Update\ER\Figure 7.0-3 Increased Employment Alternative.mxd (4/9/2018)



Source: City of Elk Grove; ESRI.

Figure 7.0-3
Increased Employment Alternative

7.0 PROJECT ALTERNATIVES

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Based on these land use changes, this alternative could accommodate up to 515 more High Density Residential units, 89 Medium Density Residential units, and 597 Mixed Use Village Center units. Low-density units and mixed-use residential units would be reduced by 148 and 65 units, respectively. Overall, this alternative could result in up to 988 additional dwelling units compared to the proposed Project. This alternative would also generate approximately 300 more jobs due to the increase in Mixed Use Village Center acreage.

**TABLE 7.0-1
LAND USE ACREAGE CHANGE FOR THE INCREASED DEVELOPMENT INTENSITY ALTERNATIVE**

Land Use Designation	Proposed Project	Increased Development Intensity Alternative	Change
Opportunity Site 2			
Community Commercial	5.22	0	-5.2
High Density Residential	5.28	21.25	16.0
Low Density Residential	30.65	17.73	-12.9
Medium Density Residential	21.10	19.74	-1.4
Parks and Open Space	0.57	0	-0.6
Mixed Use Village Center	0.00	14.93	14.9
Resource Management and Conservation	17.85	7.02	-10.8
Opportunity Site 3			
Employment Center	3.21	0	-3.2
High Density Residential	12.75	19.72	7.0
Mixed Use Residential	3.75	0	-3.8
Sterling Meadows			
High Density Residential	12.17	0.00	-12.2
Low Density Residential	12.98	0	-13.0
Medium Density Residential	53.43	0.00	-53.4

Given recent trends and changes in market demand, availability of land for redevelopment, and development capacity in the traffic model prepared for the City, these areas would be logical locations for an increase in development intensity.

Alternative 5 – Increased Employment Alternative

This alternative would change the land use designations for certain areas of the City to allow for more office development, thereby generating a greater number of jobs in Elk Grove (see **Figure 7.0-3**).

In addition to less population growth, this scenario would result in a greater number of jobs in the City, which could allow Elk Grove residents to work locally and therefore have shorter commutes (or be able to walk, cycle, or use local transit for their commutes). This alternative would yield approximately 330 fewer housing units and as many as 5,700 more jobs as compared to the proposed Project.

7.0 PROJECT ALTERNATIVES

ALTERNATIVES EVALUATION

This subsection evaluates the potential environmental impacts of the selected alternatives, including the No Project Alternative. The “build” alternatives (2 through 5) represent a range of feasible alternatives that would meet or partially meet the project objectives and would lessen one or more of the environmental impacts identified as potentially significant compared with the proposed Project.

Alternative 1 – No Project Alternative

Alternative 1 is the No Project Alternative. CEQA Guidelines Section 15126.6(e)(1) states that a No Project Alternative must be analyzed to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project, as well as to evaluate what would be reasonably expected to occur in the foreseeable future if the project were not built (CEQA Guidelines Section 15126.6[e][1] and [2]). Under the No Project Alternative, the General Plan Update would not be approved and no zoning changes or longer-term planning for development of the Study Areas would take place.

Characteristics

The No Project Alternative assumes implementation of the existing General Plan instead of the proposed General Plan Update. Under this alternative, the existing General Plan land uses would remain in place and development in the City would occur as anticipated in the 2003 General Plan, with emphasis on carefully managed growth and buildout of the SEPA and the Laguna Ridge area.

The No Project Alternative assumes that development would occur consistent with the existing General Plan land use designations. Because the proposed General Plan Update does not include substantial changes in land use designations within the existing City limits, the overall buildout under the current General Plan would be similar to the buildout of the proposed General Plan Update. It would not, however, address potential future development of the Study Areas and would not include an amended CAP.

The No Project Alternative would not preclude development of the Study Areas consistent with the existing Sacramento County General Plan and potential future amendments as development is proposed. For example, this could include development within the south of Grant Line area, for which Sacramento County has completed a visioning process.

Comparative Impacts

Natural Resources

Because development would continue to occur as currently planned and would not expand the City boundaries, the development impacts of the No Project Alternative on natural resources would be less than under the proposed Project. Development within the SEPA and other areas in the USB would continue to affect agricultural lands, topsoil, water quality, and habitat, including habitat for Swainson’s hawk and other migratory birds. It could also have the potential to affect undiscovered cultural and paleontological resources. However, these impacts would be addressed by existing regulations, construction and operational best management practices (BMPs; e.g., erosion control), programmatic mitigation measures, and measures adopted for future projects covered by the existing General Plan.

Because the No Project Alternative would not convert agricultural areas in the Study Areas to urban uses, there would be no new direct impacts from the conversion of agricultural lands in these areas, including Important Farmland and parcels covered by Williamson Act contracts. Parcels under Williamson Act contracts in nonrenewal status would expire unless the property owner(s) file for renewal. Because agricultural land south of the City would not be converted, the No Project Alternative would have no new impacts on farmland.

Under the No Project Alternative, the City would continue to permit new construction in existing planned areas, including grading, excavation, and the addition of impervious surfaces, all of which would continue to affect downstream water quality. However, the impacts of these projects and activities would be addressed by existing regulations and City policies, including stormwater BMPs. The No Project Alternative would not include addition of impervious surfaces or new water demand in the Study Areas; therefore, any impacts on groundwater supplies would be less than with the proposed Project.

Because the No Project Alternative would not include development of the Study Areas, it would have less impact on natural resources (agricultural, biological, cultural, water quality, groundwater supplies, and soils) than the proposed Project.

Air Quality and Greenhouse Gas Emissions

Air emissions would continue to increase given the planned development in the existing City limits. Agricultural emissions would continue but could decrease as agricultural lands in Elk Grove are converted to urban use. However, this is consistent with existing conditions, and agricultural uses are permitted by right in the AG-20 and AG-80 zoning districts. Overall under this alternative, air pollutant emissions would be less than generated under the proposed Project because there would be less construction and no development of new emissions sources or traffic increases in the Study Areas, and no development of the internal roadways beyond those reflected in the existing General Plan.

Overall, GHG emissions would be less than under the proposed Project because there would be less development under this alternative. However, GHG emissions per person would be more than under the proposed Project, as the City would not adopt additional GHG emissions reduction measures, such as requirements for more energy- and water-efficient buildings and transportation sector measures, and the City would likely not achieve the GHG emissions reductions required by Assembly Bill (AB) 32 and Senate Bill (SB) 32.

Community Impacts

Under the No Project Alternative, the City would continue development within the existing City limits. Planned development in Elk Grove would result in community impacts, including additional lighting, noise from stationary sources and transportation, traffic, and demands on public services and utilities. These impacts would continue to be addressed by existing policies, City code and zoning ordinances, and programmatic mitigation measures from the existing General Plan.

Any changes in the City's visual character and new sources of light or glare would be consistent with those analyzed in the existing General Plan EIR. Because there would be no new development in the Study Areas, there would be a reduced potential for exposure to residual soil contamination during construction compared to the proposed Project. The No Project Alternative would add less impervious surfaces (e.g., streets, buildings, parking lots), but the City would also continue to implement its Storm Drainage Master Plan to ensure adequate drainage and flood control.

7.0 PROJECT ALTERNATIVES

The City would continue to improve its roadways, but with less population than would be generated by the proposed Project, the No Project Alternative would have lower noise levels along the transportation corridors. In addition, there would be no community impacts related to providing public services (e.g., fire stations), recreational facilities, or utilities (e.g., water, wastewater conveyance) in the Study Areas.

The No Project Alternative would include only planned development in the existing City limits and would include continued development and improvement of transportation facilities in those areas. Therefore, this alternative would not result in the need for additional transportation improvements to provide infrastructure for future development in the Study Areas, including homes, schools, and commercial and industrial uses, and would have less impact than the proposed Project. However, the No Project Alternative would provide fewer employment opportunities and therefore would not reduce VMT to the extent that the proposed Project would.

Overall, the community impacts (e.g., light and glare, seismic hazards, noise, traffic) of the No Project Alternative would be lower because this alternative would not include development of the Study Areas and would have lower impacts on visual character and quality, including views of agricultural areas and the Sierra Nevada foothills, and direct impacts of development (e.g., noise and traffic) compared with the proposed Project.

Conclusion

Overall, the No Project Alternative would reduce most of the impacts identified for the proposed Project, but it would not be consistent with SB 32 or the City's CAP, which require implementation of measures to reduce GHG emissions. This alternative would not achieve (or would only partially achieve) the Project objectives. Because the No Project Alternative would not promote further sustainability policies, the impacts associated with greenhouse gases and air quality would be greater than for the proposed Project.

The No Project Alternative may not be as consistent with the provisions of SB 375 and SB 743 and the VMT-reducing policies from the 2017 Scoping Plan. These plans and regulations are designed, in part, to reduce potential climate change impacts associated with GHG emissions and to meet goals for 2020, 2030, and 2050. Therefore, the No Project Alternative would result in greater impacts than the proposed General Plan Update with respect to consistency with a plan or regulation designed to reduce impacts to the environment.

Because the No Project Alternative would not include development beyond the existing City limits, it would not require mitigation measure MM 5.12.1.1, which requires the City to prepare and submit to LAFCo for approval a Plan of Services for areas proposed for annexation.

The No Project Alternative would either avoid or reduce the intensity of several impacts identified as significant and unavoidable impacts in the General Plan Update. These include impacts on aesthetics, agricultural land, air quality, biological resources, cultural and paleontological resources, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and policies.

Alternative 2 – Additional Climate Action Plan Measures

Characteristics

Under this alternative, the City would adopt additional measures in the Climate Action Plan (CAP) that would further exceed established GHG reduction targets for 2020 and 2030 and allow

the City to meet the State's targets for 2050. The Draft EIR concludes that GHG emissions are a less than significant impact for 2020 and 2030 but a significant and unavoidable impact for 2050 due to uncertainty regarding availability of measures to reach 2050 emissions reduction targets. Additional measures may include, but are not limited to, CALGreen Tier 1/NetZero by 2020, additional transportation sector measures, a direct offset program, and other emissions reduction options considered as part of the Project but not included in the proposed CAP.

Comparative Impacts

Greenhouse Gas Emissions

Under the Additional Climate Action Plan Measures Alternative, the changes to the CAP could include additional building and development requirements for conservation of electricity, natural gas, and water; additional transportation sector measures (e.g., transit-oriented development, pedestrian and bicycle measures, improved public transit, efficient and alternative vehicles); and purchasing and surrendering offset credits. These measures and emissions reductions would put the City closer to achieving the State's 2050 targets. However, the feasibility of achieving the target depends on implementation of the proposed CAP, achieving short-term targets, amending the CAP with additional measures, and monitoring emissions inventories over the next 30 years. Additional technologies and reduction measures could be developed in the coming decades that would increase the probability of reaching the 2050 emissions reduction targets; however, the efficacy of this alternative would be uncertain. Based on this uncertainty, like the proposed Project, GHG emissions under this alternative would also be significant and may be unavoidable.

Transportation

Under this alternative, the City would explore and implement additional transportation section measures that would reduce fuel use and VMT. These measures could include further efforts to adopt and promote transit-oriented development, pedestrian and bicycle measures, public transit, use of efficient and alternative vehicles, and other measures and technologies as they are developed and become available. These measures could involve physical impacts such as zoning changes and changes in development patterns, upgrading pedestrian and bicycle facilities, constructing upgraded and additional public transit facilities, installing additional public vehicle charging stations, and other measures. These projects would be subject to subsequent CEQA (and potentially National Environmental Policy Act [NEPA]) review and would reduce traffic impacts overall by reducing traffic and VMT.

Natural Resources and Community Impacts

Under the Additional Climate Action Plan Measures Alternative, buildout of the proposed General Plan Update would be the same as with the proposed Project. Thus, impacts on natural resources such as biological and cultural resources, soils, and water resources would be very similar to the proposed Project. In addition, the construction and operation of future development would have impacts similar to the proposed Project on the community from changes in visual character, loss of farmland, dust, potential exposure to hazards, increased potential for flooding, noise, and construction of public facilities.

Conclusion

Overall, this alternative would have the same impacts as the proposed Project but would be consistent with AB 32, SB 32, and the City's CAP, which require implementation of measures to

7.0 PROJECT ALTERNATIVES

reduce GHG emissions. This alternative would achieve all Project objectives and would increase the probability of achieving 2050 GHG reduction targets.

Regarding consistency with regional plans, Alternative 2 would be consistent with the Sacramento Area Council of Governments' (SACOG) current Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and would be consistent with the 2017 AB 32 Scoping Plan. Therefore, this alternative would result in lower GHG emissions impacts than the proposed General Plan Update.

Alternative 2 would involve the same Planning Area as the proposed Project and would require the same mitigation measures, but it would reduce the intensity of the significant and unavoidable impact identified in the General Plan Update for GHG emissions approaching 2050. Other significant and unavoidable impacts, including on aesthetics, agricultural land, air quality, biological resources and conservation planning, cultural and paleontological resources, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and policies, would be the same.

Alternative 3 – Reduced Study Areas

Characteristics

This alternative reduces the extent of the Study Areas to those areas within the existing Sacramento County Urban Services Boundary as well as the area included in the Kammerer/99 Sphere of Influence Amendment that was filed by a private developer for the area south of Kammerer Road and west of SR 99 and approved in February 2018. This would result in a reduction in the size of the West and South Study Areas. The East and North Study Areas would remain the same as with the proposed Project.

Reducing the study areas would not preclude the development of areas outside the USB consistent with the existing Sacramento County General Plan and potential future amendments as development is proposed. For example, this could include development within the south of Grant Line area, for which Sacramento County is undertaking a visioning process.

Comparative Impacts

Aesthetics

The Reduced Study Areas Alternative would have similar aesthetic impacts as the proposed Project for infill development. However, it would partially avoid impacts on visual character because it would avoid some impacts on agricultural landscapes to the south of the City that are characteristic of Elk Grove.

Agricultural Resources

This alternative would result in the loss of farmland in the Study Areas, but would reduce impacts on agricultural lands in the South and West Study Areas. Therefore, it would have reduced farmland impacts compared to those of the proposed Project.

Air Quality and Greenhouse Gas Emissions

The Reduced Study Areas Alternative would have reduced construction impacts on air quality when compared to the proposed Project because a smaller area would be affected by grading

and excavation compared to the proposed Project. In addition, by reducing future development of residential and other land uses, this alternative would generate less traffic and less emissions. Overall, air quality impacts would be lower. The City and regulatory agencies would implement standard air quality mitigation measures required by the Sacramento Metropolitan Air Quality Management District (SMAQMD), and the City would adopt the same air quality policies as with the proposed Project.

Similarly, under this alternative, less greenhouse gases would be emitted during construction. The alternative would result in proportionately lower vehicle use. However, Alternative 3 would include the amended CAP and its GHG reduction measures. This alternative would likely achieve 2020 and 2030 targets, but like the proposed Project, it may not achieve 2050 emissions reduction targets.

Natural and Cultural Resources

The Reduced Study Areas Alternative would have reduced impacts on natural resources compared with the proposed Project. It would have reduced impacts on biological and cultural resources, topsoil, and water quality because it would affect less farmland to the south of the City that provides Swainson's hawk foraging habitat, may be prone to erosion resulting in downstream water quality issues, and may contain undiscovered cultural and paleontological resources. This alternative would be subject to the same City policies and regulatory measures as the proposed Project, but it would have less development impact on natural resources compared with the proposed Project.

Community Effects

The community effects of Alternative 3 would be lower than the proposed Project. This alternative would involve less development and fewer buildings and thus less construction in areas subject to geological risks, such as poor soil conditions and seismic hazards. It would add less impervious surface and thus would bring less flooding risk. It would involve less construction noise impacts on nearby sensitive receptors and lower long-term transportation noise impacts because there would be fewer transportation improvements and trips generated in the South and West Study Areas. Furthermore, this alternative would involve less construction for public services facilities and utilities. The Reduced Study Areas Alternative would have many of the same impacts as the proposed Project. These impacts would be addressed by complying with existing regulations (e.g., building codes) and the same City policies as the proposed Project.

Conclusion

Under Alternative 3, the Reduced Study Areas Alternative, impacts would be similar to the proposed Project. Because it would encompass a smaller area that would not include portions of the South and West Study Areas, Alternative 3 would reduce, but not avoid, some of the impacts of the proposed Project, including impacts that would be significant and unavoidable, such as aesthetic impacts due to the conversion of agricultural and natural resources landscapes.

This alternative would achieve most of the Project objectives and would be consistent with regional plans, including SACOG's current MTP/SCS, and would be consistent with the 2017 AB 32 Scoping Plan because it could reduce GHG emissions compared with the proposed Project.

The Reduced Study Areas Alternative would require the same mitigation measures that are required for the General Plan Update, which include mitigation of impacts on cultural resources and from hazardous materials discovered during construction. However, because it would not

7.0 PROJECT ALTERNATIVES

involve development beyond the existing USB, it would not require mitigation measure MM 5.12.1.1, which requires the City to prepare and submit to LAFCo for approval a Plan of Services for areas proposed for annexation.

Alternative 3 would reduce the intensity of several impacts identified as significant and unavoidable for the proposed Project. These include impacts on aesthetics, agricultural land, air quality, biological resources and conservation planning, cultural and paleontological resources, GHG emissions in 2050, groundwater supplies, traffic noise, construction of schools and utilities, and transportation plans and policies.

Alternative 4 – Increased Development Intensity Alternative

Characteristics

This alternative increases the allowable residential density and non-residential development intensity for selected key sites around the City. Land use designations for several sites would be changed from Low Density Residential (LDR) to High Density Residential (HDR). This alternative could accommodate up to 515 more High Density Residential units, 89 Medium Density Residential units, and 597 Mixed Use Village Center units. Low-density units and mixed-use residential units would be reduced by 148 and 65 units, respectively. Overall, this alternative could result in up to 988 additional dwelling units compared to the proposed Project. This alternative would also generate approximately 300 more jobs due to the increase in Mixed Use Village Center acreage.

Comparative Impacts

Aesthetics

The Increased Development Intensity Alternative would have similar aesthetic impacts as the proposed Project. However, some infill development sites would likely include higher-density residential buildings that could have multiple floors and more lighting for parking lots and common areas. Therefore, impacts on visual character and quality, and light and glare, would be similar to other residential development, but this alternative could have greater impacts on visual character due to larger buildings and require more lighting than the lower-density residential that is included in the proposed Project.

Air Quality and Greenhouse Gas Emissions

Alternative 4 would have similar construction impacts on air quality when compared to the proposed Project. However, by increasing the density of future development in some areas, this alternative could generate additional vehicle trips and traffic and thus additional emissions. The City would implement standard air quality mitigation measures required by the SMAQMD, and the City would adopt the same air quality policies. The increased density of development under this alternative could allow for alternative modes of travel in these areas (e.g., walking, cycling, or transit), which could result in fewer auto trips per unit. However, because this alternative would add more buildings and vehicles than the proposed Project, it is conservatively assumed that air quality impacts would be greater under Alternative 4 than with the proposed Project.

Under the Increased Development Intensity Alternative, more GHGs would be emitted during construction because building density would be higher. As noted above, increased density of development under this alternative could allow for alternative modes of travel in these areas, which could result in fewer GHG emissions per unit. However, because Alternative 4 would include

more units, it is assumed that this development could result in greater vehicle use and more overall GHG emissions. GHG emissions would also be reduced by the proposed CAP Update and construction of higher-efficiency buildings. This alternative would likely achieve 2020 and 2030 targets, but like the proposed Project, it may not achieve 2050 emissions reduction targets.

Natural and Cultural Resources

This alternative would have similar impacts on natural resources as the proposed Project. Alternative 4 would include ongoing infill and development of the SEPA and the Study Areas, including farmland, areas that provide Swainson's hawk foraging habitat, areas that could contain undiscovered cultural and paleontological resources, and areas prone to erosion, the development of which could result in erosion and downgradient water quality effects. This alternative would have the same footprint as the proposed Project. The resulting impacts would be addressed by the same City policies and regulatory requirements as the proposed Project.

Community Effects

The community effects of the Increased Development Intensity Alternative would be similar to those of the proposed Project. This alternative would have the same footprint as the proposed Project. It could involve more impacts related to construction noise on nearby sensitive receptors than construction of single-family residences and higher long-term transportation noise impacts because higher-density developments could require more local transportation improvements to handle higher peak traffic volumes. Furthermore, this alternative could involve more construction of public services facilities and utilities (i.e., larger and higher-capacity water, wastewater, and stormwater facilities). The Increased Development Intensity Alternative would have many of the same impacts as the proposed Project. These impacts would be addressed by complying with existing regulations (e.g., building codes) and the same City policies as the proposed Project.

Conclusion

Impacts under the Increased Development Intensity Alternative would be similar to the proposed Project. The alternative would occur on the same footprint as the proposed Project; thus, impacts on natural resources would be the same. However, due to increased density in some areas, this alternative could result in more intense localized impacts on aesthetics and other community impacts, such as noise and traffic.

Alternative 4 would achieve most of the Project objectives and could be consistent with regional plans, including SACOG's current MTP/SCS, through infill development. However, this alternative could increase GHG emissions and may not be consistent with the updated CAP and the 2017 AB 32 Scoping Plan compared with the proposed Project. The addition of high-density residential development under this alternative would help the City meet its future housing allocation. However, this alternative could add housing that could be considered out of proportion with the number of jobs created over the same period, resulting in a lower jobs-housing balance, additional traffic, and higher VMT. This alternative facilitates development on vacant or underutilized lots in the City while also providing opportunities for purposeful expansion.

The Increased Development Intensity Alternative would require the same mitigation measures that are required for the General Plan Update, which include mitigation of impacts on cultural resources and from hazardous materials discovered during construction.

7.0 PROJECT ALTERNATIVES

Alternative 5 – Increased Employment Alternative

Characteristics

The Increased Employment Alternative would increase the amount of office development compared to the proposed Project, resulting a greater number of jobs in the City. Specifically, south of Bilby Road in Sterling Meadows, the High Density Residential area would be increased by approximately 11.5 acres, and approximately 28 acres of the area designated as residential land use along Kammerer Road would be changed to Employment Center. The remaining 29 acres would be Medium Density Residential. The Commercial sites to the west of Promenade Parkway, as well as the majority of Opportunity Site 2 (except the portions designated as High Density Residential and Commercial), would also be changed to Employment Center. This alternative would yield approximately 330 fewer housing units and as many as 5,700 more jobs than the proposed Project.

Comparative Impacts

Aesthetics

The Increased Employment Alternative would have the same footprint as the proposed Project, but selected areas would be changed from residential to nonresidential uses. The aesthetics impacts of this alternative would be similar to the proposed Project in that undeveloped areas would be developed, though the type of development would differ. Existing agricultural areas in Sterling Meadows would be converted from farmland to urban development. This area would have a larger proportion of office development and would include changes in the Sterling Meadows area. The change from residential to office uses in this area would not affect views of agricultural landscapes to the south. Because the employment-generating uses under this alternative would include more lighting for parking areas, the impacts from light and glare would be greater than those of the proposed Project.

Air Quality and Greenhouse Gas Emissions

Alternative 5 would have similar construction impacts as the proposed Project. The project footprint and construction equipment and duration would be approximately the same for residential and office development. The air quality effects would not substantially differ between this alternative and the proposed Project.

The Increased Employment Alternative would generate fewer vehicle trips and lower VMT because there would be fewer residents and more existing residents would be able to find employment locally in this alternative's Employment Center. This reduction may be offset somewhat by additional miles driven by people commuting from outside of the City to Elk Grove for their employment. Overall, the Increased Employment Alternative would increase Elk Grove's jobs-housing balance and could reduce the number of miles driven, potentially reducing vehicular air emissions, by Elk Grove residents who would otherwise have to travel to employment centers in Sacramento and Rancho Cordova.

Under this alternative, similar quantities of GHGs would be emitted during construction and after development compared with the proposed Project. This alternative would include the amended CAP and its additional GHG reduction measures. Thus, Alternative 5 would likely achieve 2020 and 2030 emissions reduction targets but may not achieve 2050 targets.

Natural Resources and Community Impacts

The Increased Employment Alternative would have the same footprint as the proposed Project and would therefore have similar construction impacts on farmland, biological and cultural resources, topsoil erosion, potential exposure to contaminated soils, and downstream water quality effects. In addition, occupation and operation of future development would have impacts similar to the proposed Project on the community from dust, seismic effects, potential exposure to hazardous chemicals, introduction of impervious surfaces and decreased groundwater supplies, increased potential for flooding, and increased noise. Residential land uses produce greater demand for public services; therefore, the Increased Employment Alternative may require fewer community services, such as police protection, schools, and parks.

This alternative may also require less water and wastewater service. Residential uses require approximately 3.7 acre-feet (AF) of water per acre per year for medium density and 4.12 AF per acre per year for high density. In comparison, office uses typically require 2.75 AF per acre per year. Therefore, Alternative 6 would likely have less water demand than the proposed Project. Similarly, this alternative would likely generate less wastewater treatment demand because residential density would be lower overall.

In contrast, because employee-generating land uses tend to have higher solid waste disposal rates than residential land uses, this alternative would generate a higher demand for solid waste disposal capacity. However, given the available disposal capacity, Alternative 6 would not warrant new or expanded solid waste facilities.

Transportation

The Increased Employment Alternative would have the same footprint and similar construction traffic impacts as the proposed Project. However, this alternative would have less of a negative effect on traffic. It would generate fewer vehicle trips and lower VMT because there would be fewer new residents, and more existing residents could find employment locally in this alternative's Employment Center. This reduction could be partially offset by additional miles driven by people commuting to Elk Grove for their employment. Overall, the Increased Employment Alternative would have similar impacts compared with the proposed Project but could reduce the number of miles driven by Elk Grove residents to reach employment centers outside of the City.

Conclusion

Under Alternative 5, the Increased Employment Alternative, footprint-related impacts would be similar to the proposed Project. This alternative would have the same footprint as the proposed Project and would have very similar impacts on agricultural lands and habitats to the south. However, increased employment would allow for reductions in VMT compared to the proposed Project, which would result in the generation of fewer criteria air pollutant emissions and greenhouse gases.

This alternative would achieve most of the Project objectives and would be consistent with regional plans, including SACOG's current MTP/SCS, through employment development that would be consistent with the 2017 AB 32 Scoping Plan.

The Increased Employment Alternative would require the same mitigation measures as required for the General Plan Update, which include mitigation of impacts on cultural resources and from

7.0 PROJECT ALTERNATIVES

hazardous materials discovered during construction as well as the potential impacts of extending the USB.

COMPARISON OF ALTERNATIVES

Table 7.0-2 provides a summary by issue area of the potential impacts of the six alternatives compared with those of the proposed Project. As discussed above, the proposed Project would result in potentially significant and significant and unavoidable impacts, and for most resource areas, mitigation measures to mitigate project impacts to a less than significant level are not available or are infeasible. Alternative 1, the No Project Alternative, would have no new environmental impacts because the General Plan Update would not be adopted, zoning would be unchanged, and the City would not conduct long-range planning for the Study Areas.

**TABLE 7.0-2
SUMMARY COMPARISON OF ALTERNATIVES**

Resource Category	Proposed Project	Alternative 1 No Project	Alternative 2 Additional Climate Measures	Alternative 3 Reduced Study Areas	Alternative 4 Increased Development Intensity	Alternative 5 Increased Employment
Aesthetics	SU	NI	SU	SU (-)	SU (+)	SU (+)
Agriculture	SU	NI	SU	SU (-)	SU	SU
Air Quality	SU	NI	SU (-)	SU (-)	SU (+)	SU (-)
Biological Resources	SU	NI	SU	SU (-)	SU	SU
Cultural Resources	SU	NI	SU	SU (-)	SU	SU
Geology	LS	NI	LS	LS (-)	LS	LS
Greenhouse Gas Emissions	SU	NI	SU (-)	SU (-)	SU (+)	SU (-)
Hazards and Hazardous Materials	LS	NI	LS	LS (-)	LS	LS
Hydrology and Water Quality	SU	NI	SU	SU (-)	SU	SU
Noise	SU	NI	SU	SU (-)	SU (+)	SU (-)
Public Services	SU	NI	SU	SU (-)	SU (+)	SU
Transportation and Traffic	SU	NI	SU (-)	SU (-)	SU (+)	SU (-)
Utilities	SU	NI	SU	SU (-)	SU (+)	SU (-)

Notes:

LS: Less than Significant

NI: No Impact

SU: Significant and Unavoidable

(+) Level of impact is more severe than the proposed project

(-) Level of impact is less severe than the proposed project

The four “build” alternatives either include additional GHG emissions reduction measures, reduce the development footprint, or vary the City’s zoning to allow increased development density or increased employment. All the build alternatives would achieve most of the Project objectives and would be generally consistent with SACOG’s MTP/SCS. Due to the scale of the Project, none of the alternatives would reduce potentially significant or significant and unavoidable impacts identified for the General Plan to less than significant, with or without mitigation.

Alternative 2, the Additional Climate Action Plan Measures Alternative, would have the same footprint and similar impacts to those of the proposed Project. However, it would have reduced air and GHG emissions over the coming decades and would increase the probability of achieving 2050 GHG emissions reduction targets.

Alternative 3, the Reduced Study Areas Alternative, would reduce the General Plan’s footprint and would reduce the areal extent of the proposed Project’s Study Areas and reduce overall development in the Planning Area. The overall impacts of this alternative would be less than the proposed Project, reduced in intensity and extent by reducing the amount of farmland that would be affected by development.

Alternative 4, the Increased Development Intensity Alternative, would have the same footprint as the proposed Project and similar impacts. However, it would result in more intense local community impacts; thus, impacts on natural resources would be very similar. However, Alternative 4 could result in more intense localized impacts on aesthetics and other community impacts, such as noise and traffic.

Alternative 5, the Increased Employment Alternative, would have the same footprint as the proposed Project. Its impact on agricultural lands and habitats to the south would be the same as the proposed Project. However, increased employment would allow for reductions in VMT compared to the proposed Project, which would result in the generation of fewer criteria air pollutant emissions and greenhouse gases.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines Section 15126.6(e)(2), an environmentally superior alternative must be identified from among the other alternatives if the “no project” alternative would otherwise be the environmentally superior alternative. The environmentally superior alternative is the alternative that would result in the fewest or least significant environmental impacts. The No Project Alternative could be viewed as the environmentally superior alternative because it would avoid all of the potentially significant impacts of the proposed project in the short term. However, the No Project Alternative would not update the City’s Climate Action Plan and would not have the beneficial effect of reducing GHG emissions consistent with the 2017 AB 32 Scoping Plan. Alternative 2, the Additional Climate Action Plan Measures Alternative, would have most impacts identical to the proposed Project, but it would reduce impacts on air quality and climate change by adopting the updated CAP.

The Reduced Study Areas Alternative would reduce the General Plan footprint by 3,938 acres without increasing development density. This alternative would reduce the footprint-related impacts on farmland, habitat, cultural resources, topsoil, and water quality. Due to the reduction in development compared to the proposed Project in these Study Areas, it would also reduce operational impacts, such as traffic, GHG emissions in 2050, groundwater supplies, traffic noise and air emissions, and construction of schools and utilities. Thus, Alternative 3 would reduce the areal extent and scope of all the environmental impacts of the updated General Plan. Therefore, while the proposed Project’s significant impacts would be avoided in the short term

7.0 PROJECT ALTERNATIVES

under the No Project Alternative, Alternative 3, the Reduced Study Areas Alternative, is the environmentally superior alternative because it would reduce the footprint-related impacts compared to the proposed Project, as well as operational impacts associated with the reduction in development compared to the proposed Project.

The other build alternatives, including Alternative 2 and Alternatives 4 through 5, are not substantially different from the proposed Project or each other. Because of the fundamental nature of the General Plan, each of the alternatives involves continued development and population increases, and none of the alternatives would avoid potentially significant impacts or avoid impacts characterized as unavoidable.

REFERENCES

City of Elk Grove. 2003. *City of Elk Grove General Plan*.

7.0 PROJECT ALTERNATIVES

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