

# 5 ALTERNATIVES

## 5.1 INTRODUCTION

CCR Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe:

a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the 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.

The State CEQA Guidelines require that the EIR 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 must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the “no project” alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR “shall also identify an environmentally superior alternative among the other alternatives” (CCR Section 15126.6[e][2]).

In defining “feasibility” (e.g., “feasibly attain most of the basic objectives of the project”), CCR Section 15126.6(f)(1) states, in part:

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, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body—here, the City of Elk Grove. (See PRC Sections 21081.5, 21081[a] [3].)

## 5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

### 5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the Project (CCR Section 15126.6[a]). The purpose of the Housing Element Update is to address the housing needs of the City and to meet the requirements of State law. The Housing Element Update includes the following goals:

**GOAL H-1:** Adequate sites to accommodate the City's housing needs.

**GOAL H-2:** Adequate housing stock to meet the needs of extremely low-, very low-, low-, and moderate-income households and special-needs groups.

**GOAL H-3:** Development regulations that remove constraints to the maintenance, improvement, and development of housing.

**GOAL H-4:** Maintenance and improvement of affordable housing conditions

**GOAL H-5:** Housing opportunities for all persons, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

**GOAL H-6:** Preservation of assisted (subsidized) housing developments for lower-income households.

The purpose of the Safety Element Update is to meet the requirements of AB 747 (Levine) and SB 99 (Nielsen). The Safety Element Update includes revisions to Goal SAF-1: A Safe Community.

### 5.2.2 Environmental Impacts of the Housing Element and Safety Element Update Project

Sections 3.1 through 3.15 and Chapter 4 of this Draft SEIR address the environmental impacts of implementation of the proposed Project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the Project, as identified in Chapters 3 and 4 of this Draft EIR and summarized below. If an environmental issue area analyzed in this Draft EIR is not addressed below, it is because no significant impacts were identified for that issue area.

- ▶ Impact 3.12-3: Increased Demand for New Public School Facilities
- ▶ Impact 3.13-1: Result in an Exceedance of City of Elk Grove General Plan VMT Thresholds
- ▶ Impact 4-20: Cumulative Public School Impacts
- ▶ Impact 4-22: Cumulative Impacts on Vehicle Miles Traveled

### PUBLIC SERVICES AND RECREATION

- ▶ Impact 3.12-3: Impact 5.11.3.1 of the General Plan EIR identifies that future development in the City would result in an increase of school-aged children and would require the construction of new public school facilities. As determined by the General Plan EIR, because school facilities would be constructed by the EGUSD the environmental impacts of school construction would be significant and unavoidable. Implementation of the Project would result in a substantial increase in student generation that could require additional school facility needs beyond current General Plan buildout. This would be a substantial increase in impact severity than what was previously identified in General Plan EIR Impact 5.11.3.1. No mitigation measures are available to reduce potentially significant impacts; thus this impact would be significant and unavoidable.

## TRANSPORTATION

- ▶ General Plan Impact 5.13.2 identified that implementation of the General Plan would result in increased VMT that would be significant and unavoidable. Project-generated VMT per service population associated with some of the housing sites rezoned under the Housing Element Update would result in an exceedance of the City's VMT per service population threshold for the High Density Residential land use designation (i.e., 20.6 VMT). The addition of Project-generated total daily VMT within the City could also result in an exceedance of the established Citywide limit of 6,367,833 VMT. Therefore, implementation of the Project could result in substantially more severe VMT impacts than identified in the General Plan EIR. Implementation of mitigation could potentially reduce the extent of this impact but would not reduce the VMT below the City VMT standards. Implementation of the Safety Element would not result in changes in planned land uses or roadway facilities that would alter VMT. Therefore, the Project would result in a significant and unavoidable impact to VMT.

## CUMULATIVE IMPACTS

- ▶ Impact 4-20: Cumulative Public School Impacts. General Plan EIR Impact 5.11.3.2 evaluated whether implementation of the General Plan, 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. While the EGUSD could and should implement measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. Project impacts would be cumulatively considerable.
- ▶ Impact 4-22: Cumulative Impacts on Vehicle Miles Traveled. The discussion of vehicle miles traveled (VMT) impacts associated with the Project for Impact 3.13-1 is inherently a cumulative impact analysis as it compares the Project to City General Plan VMT standards associated with buildout of the City. As detailed under Impact 3.13-1, the addition of Project-generated total daily VMT within the City would result in an exceedance of the established Citywide limit of 6,367,833 VMT. Therefore, the Project's contribution to substantial effects related to VMT would be cumulatively considerable.

## 5.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165–1167).

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision maker(s). (See PRC Section 21081[a][3].) At the time of action on the Project, the decision maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint and may reject an alternative on that basis provided that the decision maker(s) adopt a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 998).

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternative was considered by the City of Elk Grove but is not evaluated further in this Draft SEIR.

### 5.3.1 Housing Element Update Alternative - Housing Sites Below Regional Housing Needs Allocation

This alternative would reduce or eliminate the proposed candidate housing sites identified in Table 2-2. The reduction of total housing sites would reduce impacts identified for the proposed Housing Element Update. This alternative was rejected as it would not accommodate the City's share of the regional housing allocation established in the SACOG Regional Housing Needs Plan for the 2021–2029 planning period and would not meet Housing Element Update Goal H-1 and H-2.

## 5.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in this Draft SEIR:

- ▶ **Alternative 1: No Project Alternative** assumes continued implementation of the City's 2013 Housing Element and the Safety Element as adopted with the 2018 General Plan. No changes would be made to address the requirements of State law. The housing sites would retain their current General Plan land use and zoning designations.
- ▶ **Alternative 2: Reduced Sites Alternative** includes sufficient sites to meet the City's RHNA allocation but would reduce the extent of total housing sites to provide a buffer for the RHNA allocation.

Further details on these alternatives, and an evaluation of their environmental effects relative to those of the proposed Project, are provided below. For purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as "impacts" that are greater, similar, or less to describe conditions that are worse than, similar to, or better than those of the proposed Project.

### 5.4.1 Alternative 1: No Project Alternative

Under the No Project Alternative, the City would continue to implement the adopted 2013 Housing Element and the Safety Element as adopted in the 2018 General Plan. No changes to either element would be made to address the requirements of State law. Since adoption of the 2013 Housing Element, the City has been issued a Regional Housing Needs Allocation (RHNA) by the Sacramento Area Council of Governments (SACOG) and is required by State law to address its housing needs in an updated Housing Element. The Housing Element goals, policies, and programs as well as the Land Use Map and Zoning Code would not be updated to address the City's housing needs under this alternative. The 25 candidate housing sites would retain their adopted General Plan and zoning designations. The Safety Element would not be updated to incorporate emergency access route information as required by AB 747 (Levine) and SB 99 (Nielsen).

The No Project Alternative 1 would result in the continuation of existing conditions and planned development of the City. No new significant environmental impacts or an increased severity of environmental impacts identified in the General Plan EIR would occur under this alternative because it would retain the currently General Plan land use designations and policy provisions.

### 5.4.2 Alternative 2: Reduced Sites Alternative

Under the Reduced Sites Alternative, existing zoning remains on the existing sites and rezones would occur on the candidate housing sites with the exception of housing sites C-2, C-3, C-5, C-6, C-13, C-14, C-15, C-16, C-18, and C-24. This alternative would reduce the acreage available for high-density housing from 261.5 acres proposed by the Project to 201.82 acres, a reduction of 59.68 acres. The Reduced Sites Alternative would provide for 5,184 residential units, a decrease of 1,565 housing units from the proposed Housing Element Update. This alternative would still meet

the City's RHNA allocation of 4,265 housing units for very low and low income groups with a buffer of approximately 919 dwelling units. This alternative would be consistent with scenario 3 evaluated in the VMT analysis provided in Appendix D.

Under this alternative, the Safety Element would be updated as anticipated by the Project. As discussed in Chapter 2, "Project Description," of this Draft SEIR, these changes are required by AB 747 (Levine) and SB 99 (Nielsen).

## AESTHETICS

As discussed in Section 3.1, "Aesthetics," of this Draft SEIR, the Project would result in less-than-significant impacts related to changes in visual character and new sources of substantial light or glare from new high density residential development. Under this alternative, ten sites would be removed from the Project and would retain their existing zoning and General Plan designations which include residential and commercial uses. Thus, development of these sites in accordance with their existing zoning and land use designations would result in less of an impact related to changes to the existing visual character of the area, as well as potentially result in new sources of nighttime lighting in the area. (*Less*)

## AIR QUALITY

As discussed in Section 3.2, "Air Quality," of this Draft SEIR, the Project would result in less-than-significant impacts related to air emissions during construction and operation. Under the Reduced Sites Alternative, up to 1,565 fewer housing units would be constructed as compared with the proposed Project. Because the sites removed from the Project would be built out according to their existing zoning and land use designations, they would still generate construction emissions as all sites are already anticipated for development under the General Plan. However, this alternative would result in reduced operational air pollutant emissions because it would consist of up to 1,565 fewer housing units, which could also reduce potential impacts related to public health. (*Less*)

## ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

As discussed in Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources," implementation of adopted mitigation measures from the General Plan EIR would ensure that Project impacts would be less than significant. The Reduced Sites Alternative would involve earthmoving activities similar to those of the Project, which could result in the disturbance, destruction, or alteration of known or as-yet-undiscovered/unrecorded archaeological resources, tribal cultural resources, or human remains. This alternative would remove from the Project ten sites included in Table 3.3-4 of this Draft SEIR, which would reduce the number of potential housing sites containing historic-age buildings. Although the Reduced Sites Alternative would reduce the intensity of operations on the sites, site disturbance would be similar as the Project because these housing sites would still allow for residential development under their current General Plan land use designations. Therefore, the impacts under the Reduced Sites Alternative would be similar to those under the Project. (*Similar*)

## BIOLOGICAL RESOURCES

As discussed in Section 3.4, "Biological Resources," of this Draft SEIR, the Project would result in less-than-significant impacts on biological resources because it would not expand the overall planned development footprint of the City. The Reduced Sites Alternative would be similar as the Project because these housing sites would still allow for residential development under their current General Plan land use designations. Therefore, the impacts under the Reduced Sites Alternative would be similar to those under the Project. (*Similar*)

## ENERGY

As discussed in Section 3.5, "Energy," of this Draft SEIR, the Project would result in less than significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. Likewise, the Reduced Sites Alternative would also not result in significant energy impacts. However, the Reduced Sites Alternative would have lower energy demands than that of the Project because of the reduced intensity of use on the housing sites that would not be developed with high-density residential units. Therefore, energy impacts under the Reduced Sites Alternative would be less than those under the Project. *(Less)*

## GEOLOGY AND SOILS

As discussed in Section 3.6, "Geology and Soils," of this Draft SEIR, implementation of adopted mitigation measures from the General Plan EIR would ensure that Project paleontological impacts would be less than significant. Construction activities for the Reduced Sites Alternative would be similar as the Project because these housing sites would still allow for residential or commercial development under their current General Plan land use designations. With implementation of adopted mitigation measures, geology and soils impacts under the Reduced Sites Alternative would be similar to those that would occur under the Project. *(Similar)*

## GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As discussed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," the Project would result in less-than-significant impacts related to GHGs and climate change. Under the Reduced Sites Alternative, the intensity of site development would be reduced; therefore, less operation-related GHG emissions would be generated than under the Project. Construction emissions for this alternative and the Project are anticipated to be similar because the sites would have the same development footprint. Thus, GHG operation-related emission impacts under the Reduced Sites Alternative would be less than under the Project. *(Less)*

## HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 3.8, "Hazards and Hazardous Materials," of this Draft SEIR, implementation of mitigation measures adopted in the General Plan EIR would ensure that Project impacts would be reduced to a less-than-significant level. As with the Project, development under the Reduced Sites Alternative would be required to evaluate the site for potential contamination prior to approval of site disturbance, as well as adhere to all applicable federal, State, and local regulations regarding hazardous materials. Thus, impacts on public health and safety related to hazardous materials or hazards under the Reduced Sites Alternative would be similar to those under the Project. *(Similar)*

## HYDROLOGY AND WATER QUALITY

As discussed in Section 3.9, "Hydrology and Water Quality," of this Draft SEIR, the Project would result in less than significant impacts related to hydrology and water quality. Compared to the Project, the Reduced Sites Alternative would allow development of the same acreage, so impacts related to new impervious surfaces would be similar. Under the Reduced Sites Alternative, there would not be as many new residential units (1,565 fewer housing units) in the area, so it is expected that demand for groundwater would be less than under the Project. On balance, the Reduced Sites Alternative would have similar impacts as the Project. *(Similar)*

## LAND USE, PLANNING, POPULATION, AND HOUSING

As discussed in Section 3.10, “Land Use, Planning, Population, and Housing,” of this Draft SEIR, the Project would not result in significant impacts related to population growth or land use conflicts. As with the Project, future projects under the Reduced Sites Alternative would be required to comply with City Municipal Code requirements that address environmental effects from development, such as Municipal Code Chapter 16.44 (Land Grading and Erosion Control) and Municipal Code Section 6.32.080 (exterior noise standards for sensitive receptors). Further, the Project and the Reduced Sites Alternative would be consistent with the SACOG 2020 MTP/SCS. Land use and planning impacts associated with this alternative would be similar to those under the Project. *(Similar)*

## NOISE AND VIBRATION

As discussed in Section 3.11, “Noise and Vibration,” of this Draft SEIR, the Project would result in less-than-significant impacts related to noise and vibration during construction and operation, including traffic noise. Future development under the Reduced Sites Alternative, like all development in the City, would be required to adhere to the Elk Grove Construction Specifications Manual requirements regarding allowable times and hours of work and noise control measures. As development under the Reduced Sites Alternative would be less intense than under the Project, it is expected that the reduction in new dwelling units would result in lower traffic noise impacts as compared to the Project. Development under this alternative would not increase operational vibration impacts because residential land uses generally are not substantial sources of vibration. *(Less)*

## PUBLIC SERVICES AND RECREATION

As discussed in Section 3.12, “Public Services and Recreation,” of this Draft SEIR, the Project would generate additional residents, which would increase the need for additional fire protection and law enforcement services and additional parks. However, these services are funded through a variety of sources (e.g., property taxes, development impact fees, fees for services) and are expanded as needed to accommodate additional population growth. For parks, City Municipal Code Chapter 22.40 and General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents, though some specific plan areas may require additional acreage. Because this alternative would develop fewer homes than anticipated by the Project, there would be slightly less impact than under the Project.

As discussed in Section 3.12, “Public Services and Recreation,” of this Draft SEIR, the Project would result in significant and unavoidable impacts related to public schools due to the increase in students that would be generated. It should be noted that the General Plan EIR also concluded that implementation of the General Plan would have significant and unavoidable impacts on public schools because while the EGUSD could and should implement measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. Under the Reduced Sites Alternative, a reduced amount of housing units would be developed (a reduction of up to 1,565 housing units and up to 614 fewer students), which would reduce the number of students generated as compared to the Project. However, even under the Reduced Sites Alternative, additional students would be generated as compared with the General Plan. Thus, while the Reduced Sites Alternative would not result in as much of a population increase as the Project, it would generate additional students. While the impact would remain significant and unavoidable under the Reduced Sites Alternative, it would be slightly less than under the Project. *(Less)*

## TRANSPORTATION

As discussed in Section 3.13, “Transportation,” of this Draft SEIR, the Project would result in significant and unavoidable impacts related to VMT. As identified in Appendix D, the Reduced Sites Alternative would be consistent with scenario 3 evaluated in the VMT analysis and would be consistent with the VMT standards in General Plan Policy MOB-1-1 and would avoid this impact. This alternative would not exceed the established Citywide limit of 6,367,833 VMT as it accommodates the RHNA allocation of Low and Very Low-Income units.. *(Less)*

## UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.14, “Utilities and Service Systems,” of this Draft EIR, the Project would result in less-than-significant impacts related to utilities and service systems. Because the Reduced Sites Alternative would not include as many new residential units as the proposed Project, this alternative would be expected result in lower demand for utilities and service systems. Thus, while both the Project and the Reduced Sites Alternative would result in a net increase in the number of residential units in the City beyond the assumptions of the General Plan EIR, this alternative would result in fewer net new residents and demand for utilities would be less than under the proposed Project. (*Less*)

## 5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project Alternative (described above in Section 5.4.1) would avoid all adverse impacts resulting from the Project analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project Alternative would not meet the Project objectives.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126.6[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in Table 5-1, below, the Reduced Sites Alternative would be the environmentally superior action alternative.

**Table 5-1 Summary of Environmental Effects of the Alternatives Relative to the Housing Element and Safety Element Update Project**

Environmental Topic	Project Impacts	Alternative 1: No Project Alternative	Alternative 2: Reduced Sites Alternative
Aesthetics	Less than significant	Less	Less
Air Quality	Less than significant	Less	Less
Archaeological, Historical, and Tribal Cultural Resources	Less than significant (with mitigation)	Less	Similar
Biological Resources	Less than significant	Less	Similar
Energy	Less than significant	Less	Less
Geology and Soils	Less than significant (with mitigation)	Less	Similar
Greenhouse Gas Emissions and Climate Change	Less than significant	Less	Less
Hazards and Hazardous Materials	Less than significant (with mitigation)	Less	Similar
Hydrology and Water Quality	Less than significant	Less	Similar
Land Use, Planning, Population, and Housing	Less than significant	Less	Similar
Noise	Less than Significant	Less	Less
Public Services and Recreation	Significant and unavoidable (public schools)	Less	Less
Transportation	Significant and unavoidable (VMT)	Less	Less
Utilities and Service Systems	Less than significant	Less	Less