6 ALTERNATIVES

6.1 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[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].)

6.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.2.1 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]). Chapter 2, "Project Description," articulates the following Project objectives:

- construct a new larger zoo with expanded habitats and facilities to support a broader range of animal species;
- meet current animal care standards for animals housed in the zoo;
- increase access to the zoo with adequate parking facilities;
- provide enhanced visitor experience through education, overnight stay, event spaces, and animal encounters.

6.2.2 Environmental Impacts of the New Zoo in Elk Grove Project

Sections 3.1 through 3.14 and Chapter 4 of this Draft EIR 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.

AIR QUALITY

- The Project would not generate construction emissions of criteria air pollutants and ozone precursors exceeding SMAQMD's daily mass emissions thresholds of significance. Nevertheless, the Project does not incorporate SMAQMD's BMPs into the Project description. Mitigation (Mitigation Measure 3.2-1) has been identified to reduce this impact to **less-than-significant** under Project and cumulative conditions (see Impacts 3.2-1 and 4-3).
- Project construction could result in sources of toxic air contaminants (TACs) that could expose sensitive receptors to a level of cancer risk greater than 10 in 1 million. Mitigation (Mitigation Measure 3.2-3) has been identified to reduce this impact to **less than significant** under Project conditions (see Impact 3.2-3). There would be no cumulative impacts.

BIOLOGICAL RESOURCES

- Project construction would include ground disturbance and construction of new buildings, which could result in disturbance to or loss of special-status wildlife species and reduced breeding productivity of these species. Mitigation (Mitigation Measures 3.3-1a and 3.3-1c) has been identified to reduce this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.3-1 and 4-6).

CULTURAL AND TRIBAL CULTURAL RESOURCES

- Project-related ground-disturbing activities could result in the discovery of or damage to yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. Mitigation (Mitigation Measures 3.4-1) has been identified to reduce this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.4-1 and 4-7).
- Tribal consultation has not resulted in the identification of tribal cultural resources on the Project site. However, excavation activities associated with Project construction could disturb or destroy previously undiscovered significant subsurface tribal cultural resources. Mitigation (Mitigation Measure 3.4-2a and 3.4-2b) has been

identified to reduce this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.4-2 and 4-7).

GEOLOGY AND SOILS

- Excavations required for Project construction and off-site infrastructure improvements could disturb or destroy unique paleontological resources. Mitigation (Mitigation Measure 3.6-5) has been identified to reduce this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.6-5 and 4-11).

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

- Construction and operation of the Project would result in an increase in greenhouse gas (GHG) emissions. Mitigation (Mitigation Measures 3.7-1 and 3.13-1a through 3.13-1d) has been identified to reduce this impact. However, impacts would remain **significant and unavoidable** under Project and cumulative conditions (see Impacts 3.7-1 and 4-12).

NOISE AND VIBRATION

- Project-related construction noise would expose nearby noise-sensitive receptors to elevated noise levels that could exceed local standards. Mitigation (Mitigation Measure 3.11-1) has been identified to reduce the extent of this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.11-1 and 4-17).
- The Project would involve the long-term operation of new noise sources and new noise-generating activities on the Project site that could expose off-site noise-sensitive receptors to excessive noise levels. Mitigation (Mitigation Measure 3.11-3) has been identified to reduce this impact to **less than significant** under Project and cumulative conditions (see Impacts 3.11-3 and 4-19).

TRANSPORTATION

- Implementation of the Project would increase the number of vehicle trips and VMT as compared to VMT from the Sacramento Zoo under Phase 1 and full buildout conditions. Mitigation (Mitigation Measures 3.13-1a through 3.13-1d) has been identified to reduce this impact. However, with implementation of these mitigation measures net VMT would remain above existing conditions and no other feasible mitigation is available. Impacts would be **significant and unavoidable** under Project and cumulative conditions (see Impact 3.14-1 and 4-22).

6.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives 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 Pub. Resources Code, § 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) adopts 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 alternatives were considered by the City of Elk Grove but are not evaluated further in this Draft EIR.

6.3.1 Southwestern Elk Grove Alternative Site Location

This alternative would place the New Zoo in the southwestern portion of Elk Grove on available vacant land. However, the southwestern portion of the City contains topographical challenges for building. The area is in the 100-year floodplain, as designated in the Elk Grove General Plan (2019). Buildings are not permitted in this area of the City due to the flood risk and impacts on sensitive floodplain habitats near the Sacramento Delta.

6.3.2 Alternative Sites in the City of Sacramento

This alternative would provide an alternative location for the New Zoo in the City of Sacramento, either in the Meadowview or Natomas (two locations, one at the former Sacramento Kings area and one at the Natomas Community Park site) neighborhoods. A feasibility study was prepared by the City of Sacramento in 2020 and identified these locations. The City of Sacramento adopted a reuse plan for the previous Sacramento Kings Arena that did not include use as a zoo. The Meadowview site was put towards another use. Ultimately, the Sacramento City Council did not select any site.

6.3.3 Expansion of Existing Sacramento Zoo

This alternative would expand the existing Sacramento Zoo to meet the Association of Zoo and Aquariums standards, support a larger range of animal species, expand parking, and enhance visitor experience. The Sacramento Zoo has existing transit, pedestrian, and bicycle facilities that serve the zoo. Therefore, significant VMT impacts may be reduced by expanding the Sacramento Zoo at the current location. Under this alternative only 30 acres would be available for expansion and expansion would not significantly increase the number of animals at the zoo, limiting additional visitors (City of Sacramento 2020). Additionally, expansion of the Sacramento Zoo would require removal of existing ballfields reducing recreational opportunities. This alternative would not meet the project objectives and is considered infeasible.

6.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives evaluated in this Draft EIR.

- Alternative 1: No Project–No Development Alternative assumes no construction of the New Zoo. The Project site would remain vacant in its current condition.
- Alternative 2: Reduced Development Alternative assumes development of Phase 1a and 1b only.
- Alternative 3: New Site Location Alternative assumes the New Zoo would be developed at the site of the Elk Grove Park.

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.

6.4.1 Alternative 1: No Project–No Development Alternative

Under Alternative 1, the No Project–No Development Alternative, no actions would be taken. The Project site would remain vacant in its current condition and used for grazing. The New Zoo would not be constructed on the site and continue to operate in Sacramento at the current Sacramento Zoo site. The No Project-No Development Alternative would not meet the Project objectives. However, as required by CEQA (Section 15126.6[e]), the No Project-No Development Alternative is evaluated in this Draft EIR.

AESTHETICS

Under this alternative, there would be no alteration of the visual character and quality of the Project site. Views of the Project site from surrounding vantage points would not change, and no new sources of light and glare would be created, as would occur with the proposed Project. Project-related visual character and lighting impacts would not occur. Therefore, impacts under the No Project–No Development Alternative would be less than those that would occur with the Project. (*Less, no new impact*)

AIR QUALITY

Because the No Project–No Development Alternative would involve no construction disturbance and no new vehicular trip generation, this alternative would not generate construction- or operation-related air emissions and toxic air contaminants. By comparison, implementing the Project would result in less-than-significant construction-related emissions (with mitigation) and less than significant operational emissions. The No Project–No Development Alternative would not result in development and related air quality emissions. Therefore, implementation of the No Project–No Development Alternative would reduce impacts associated with Project emissions, and impacts would be less than those that would occur with the Project. (*Less, no new impact)*

BIOLOGICAL RESOURCES

The No Project–No Development Alternative would not result in any new ground disturbance on the Project site or in the off-site improvement areas. This would avoid Project-related significant but mitigatable impacts related to nesting birds and raptors, as well as potential disturbance to burrowing owl, Swainson's hawk, and sandhill crane. Overall, impacts under this alternative would be less than those that would occur with the Project. (*Less, no new impact*)

CULTURAL AND TRIBAL CULTURAL RESOURCES

The No Project–No Development Alternative would not involve any earthmoving activities, thereby avoiding impacts related to the disturbance, destruction, or alteration of any known or as-yet-undiscovered/unrecorded archaeological resources, tribal cultural resources, or human remains. In comparison, implementing the proposed Project would result in ground disturbance that could cause potentially significant impacts related to disturbance of undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. These impacts would be reduced to less-than-significant levels through implementation of mitigation measures. Because the No Project–No Development Alternative would not include any ground disturbance, it would avoid this impact. Therefore, cultural resource impacts under the No Project–No Development Alternative would be less than would occur under the Project. (*Less, no new impact*)

ENERGY

Under the No Project–No Development Alternative, no demolition or construction activities would occur. Therefore, there would be no change in energy use. The Project would increase energy use but would be all electric and design several new buildings to be energy efficient and provide on-site power generation through solar photovoltaic

systems. Thus, energy impacts under the No Project–No Development Alternative would be less than would occur under the Project. (*Less, no new impact*)

GEOLOGY AND SOILS

Under this alternative, no new buildings and no Project-associated facilities would be constructed, and existing site uses would remain. No ground disturbance or earthmoving activities would occur. Therefore, no impacts on previously undiscovered paleontological resources would occur. As described in Section 3.6, "Geology and Soils," Project impacts would be less than significant with the implementation of mitigation. Therefore, soils, geology, and seismicity impacts would be less under the No Project–No Development Alternative than under the Project. (*Less, no new impact*)

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Under the No Project–No Development Alternative, the Project site would remain in its current condition. Project construction- and new operation-related emissions of greenhouse gases (GHG) would not occur. By comparison, implementing the Project would result in significant and unavoidable impacts related to GHG emissions. Therefore, implementation of the No Project–No Development Alternative would avoid the significant and unavoidable impact associated with GHG emissions, and impacts would be less than those that would occur with the Project. (*Less, no new impact*)

HAZARDS AND HAZARDOUS MATERIALS

No significant hazard impact would occur under the Project because it would be required to comply with federal, State, and local regulations regarding the handling of hazardous materials. Under this alternative, no new buildings or facilities associated with the Project would be constructed. Therefore, impacts on public health and safety related to hazardous materials or hazards would be less under the No Project–No Development Alternative than under the Project. (*Less, no new impact*)

HYDROLOGY AND WATER QUALITY

Under the No Project–No Development Alternative, there would be no potential for construction-related releases of sediment and contaminants into surface waters or groundwater, and no changes in water demand, stormwater generation, drainage patterns, or new flood risk. In comparison, the existing site is vacant, and implementation of the Project would result in on-site development and less-than-significant impacts related to hydrology and water quality. Implementing the No Project–No Development Alternative would result in impacts on hydrology and water quality that would be less than those that would occur under the Project. (*Less, no new impact*)

LAND USE AND PLANNING

The Project would not result in any significant land use impacts. This alternative would not divide an established community, nor would it conflict with plans adopted for the purpose of avoiding or mitigating a significant effect. As described in Section 3.10, "Land Use and Planning," the Project would be consistent with General Plan policies and would comply with City Municipal Code requirements that address environmental effects from development. Further, the Project would also be consistent with the Sacramento Area Council of Governments' (SACOG's) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). Because the No Project–No Development Alternative would not require develop the vacant site requiring a conditional use permit, impacts associated with this alternative would be less than would occur under the Project. (*Less, no new impact*)

NOISE AND VIBRATION

Under this alternative, no Project-related construction activities would occur, and there would be no increases in short-term construction-related noise at nearby sensitive receptors. No increase in Project traffic noise, as well as new noise sources and new noise-generating activities on the site, would occur. This alternative would avoid Project-related mitigable noise impacts associated with construction and operational noise. Therefore, noise impacts under the No Project–No Development Alternative would be less than those that would occur under the Project. (*Less, no new impact*)

PUBLIC SERVICES AND RECREATION

The Project would not result in any significant public service impacts that would involve the construction of new facilities, but would include on-site security staff employed by the New Zoo. The No Project–No Development Alternative would result in less of an impact than the proposed Project with regard to public services. (*Less, no new impact*)

TRANSPORTATION/TRAFFIC

Implementing the No Project–No Development Alternative would not result in an increase in vehicular or multimodal trips. Therefore, it would not result in a change in trips or vehicle miles traveled (VMT) greater than existing conditions, or an increase in the demand for transit, bicycle, or pedestrian services and facilities. Additionally, the No Project–No Development Alternative would not result in any change to the existing transportation network. Therefore, it would not result in impacts on transportation or air navigation hazards, safety, or emergency access or conflict with transportation plans, guidelines, policies, or standards. Therefore, implementing the No Project–No Development Alternative would not result in any new transportation-related impacts and would avoid significant impacts related to VMT. The No Project–No Development Alternative would result in less of an impact than would the Project. (*Less, no new impact*)

UTILITIES AND SERVICE SYSTEMS

The Project would result in less than significant environmental impacts associated with water supply, wastewater service, and solid waste generation. The No Project–No Development Alternative would not result in any new demand for water, wastewater treatment, stormwater conveyance, electricity, or natural gas, nor would it result in the need for new infrastructure. The No Project–No Development Alternative would result in less of an impact than would the Project. (*Less, no new impact*)

6.4.2 Alternative 2: Reduced Development Alternative

Under the Reduced Development Alternative (Alternative 2), Phase 1 (Phases 1a and 1b) would be constructed on the Project site. Future Phases 2 through 4 would not occur and development of Phases 1a and 1b would be considered full buildout on 30 acres of the Project site. Alternative 2 would include the main entry complex, Giraffe Lodge, and Gelada Cafe, animal care center, overnight lawn, educational services, and administrative and office modular buildings. Exhibit zones for this alternative would include the Green Corridor and Africa. Under this alternative the New Zoo would not include the California or Australasia zones. Offroad infrastructure improvements would occur under this alternative, including the proposed parking facilities. Visitation under this alternative would be reduced to approximately 508,000 annual visitors.

AESTHETICS

The Reduced Development Alternative would result in reduced visual impacts to the Project site as compared to the Project because only Phases 1a and 1b would be constructed. Reduced development would similarly result in fewer

impacts from light and glare. Development on the site would continue to be subject to the requirements in the City's General Plan, Zoning Code, and New Zoo SPA related to visual character. Therefore, the reduced development footprint would result in fewer Aesthetic impacts. Impacts under this alternative would be less than those that would occur under the Project. *(Less)*

AIR QUALITY

The Reduced Development Alternative would result in reduced development on the site as compared to the Project because only Phase 1a and Phase 1b would be developed. Construction and operational related emissions would be reduced as compared to the Project. However, similar to the Project, this alternative would expose nearby sensitive receptors along Lotz Parkway to construction related emissions and toxic air contaminants. Although construction impacts would continue to occur under this alternative the reduced development footprint would result in fewer air quality impacts as compared to the Project. This impact was identified as significant but mitigable for the Project. Therefore, impacts under this alternative would remain less than significant with mitigation, but would be less than those that would occur under the Project. *(Less)*

BIOLOGICAL RESOURCES

The Reduced Development Alternative would result in reduced ground disturbance as compared to the Project because the areas proposed for the California and Australasia zones would not be developed. However, similar to the Project, this alternative could affect nesting birds and raptors, as well as burrowing owl, Swainson's hawk, and sandhill crane. However, the reduced development footprint would result in fewer impacts to biological resources as compared to the Project. This impact was identified as significant but mitigatable for the Project and would remain less than significant with mitigation under this alternative. Impacts under this alternative would be less than those that would occur under the Project. (*Less*)

CULTURAL, AND TRIBAL CULTURAL RESOURCES

The Reduced Development Alternative would involve less earthmoving activities than the Project, which could result in reduced disturbance, destruction, or alteration of known or as-yet-undiscovered/unrecorded archaeological resources, tribal cultural resources, or human remains. Although the Reduced Development Alternative would include less development on the site, the Alternative 2 would develop most of the site and therefore would not avoid potential impacts associated with archaeological or tribal cultural resources. The impacts under the Reduced Development Alternative would be less than those under the Project, and would require mitigation for unanticipated discovery of cultural resources. (*Less*)

ENERGY

Under the Reduced Development Alternative, construction activities would occur at the Project site, and energy would be temporarily used for construction activities. New Project buildings and facilities would incorporate energy efficiency features and the Project would be all electric. As with the Project, implementing the Reduced Development Alternative would not result in the long-term wasteful, inefficient, and unnecessary consumption of energy. However, this alternative's energy demands would be less than those of the Project because of the reduced size of the New Zoo. Therefore, energy impacts under the Reduced Development Alternative would be less than those under the Project. (*Less*)

GEOLOGY AND SOILS

Construction activities for the Reduced Development Alternative would be less than those described for the Project (development of Phase 1 only), including ground-disturbing and earthmoving activities. However, construction activities may still result in damage to and/or destruction of previously undiscovered paleontological resources. As described in

Section 3.6, "Geology and Soils," impacts would be less than significant with the implementation of mitigation. Therefore, because the development footprint for Alternative 2 would be reduced geology and soils impacts under the Reduced Development Alternative would be less than those that would occur under the Project. (*Less*)

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Under the Reduced Development Alternative, the development on the site would be reduced. Therefore, fewer operation- and construction-related GHG emissions would be generated than under the Project. However, although operation-related GHG emissions would be reduced the Project would continue to have a significant VMT impact and would not meet regional standards for GHG emissions. Therefore, although GHG emissions under the Reduced Development Alternative would be less than under the Project GHG impacts would remain significant. (*Less*)

HAZARDS AND HAZARDOUS MATERIALS

No significant hazard impacts would occur under the Project because it would be required to comply with federal, State, and local regulations regarding the handling of hazardous materials. As with the Project, the use and handling of hazardous materials under this alternative would be consistent with federal, State, and local regulations, which would minimize the potential for upset or accident conditions or exposure to nearby receptors. Therefore, impacts on public health and safety related to hazardous materials or hazards under the Reduced Development Alternative would be similar to those under the Project. *(Similar)*

HYDROLOGY AND WATER QUALITY

The Reduced Development Alternative would include a reduced development footprint as compared to the Project. Therefore, although the amount of impervious surfaces would be decreased under this alternative there is still potential for construction-related releases of sediment and contaminants into surface waters or groundwater, as well as stormwater generation, changes in drainage patterns, and/or flood risk. Impacts to hydrology and water quality would be reduced under this alternative and remain less than significant. (*Less)*

LAND USE AND PLANNING

The Project would not result in any significant land use impacts. This alternative also would not result in significant land use impacts (division of an established community or conflict with plans adopted for the purpose of avoiding or mitigating a significant effect). As with the Project, the Reduced Development Alternative would include development on the vacant site and a conditional use permit for the New Zoo. Further, the Project and the Reduced Development Alternative would also 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

Under this alternative, construction activities similar to those that would occur under the Project would occur; however, construction would only occur on 30 acres of the site for development of Phase 1a and 1b. The single family residences along Lotz Parkway would be exposed to similar construction noise as the Project because construction would occur at the same distance from the residences under this alternative. Construction noise was identified as significant but mitigable and the same mitigation would apply under this alternative. However, overall construction noise would be reduced with less development. As with the Project, this alternative would also include traffic noise, as well as new noise sources and new noise-generating activities. Similar to the Project, this alternative could result in operational noise impacts from heating, ventilation, and air conditioning (HVAC) equipment. This impact was identified as significant but mitigable for the Project. As a result of overall reduced development, impacts under this alternative would be less than those that would occur under the Project. (*Less*)

PUBLIC SERVICES AND RECREATION

The Project would not result in any significant public service impacts that would involve the construction of new facilities. The extent of public services needed for the Reduced Development Alternative would be less than the Project because potential future phases would not be developed. The need for public services would be reduced under this alternative because there would be fewer visitors and employees for the New Zoo. Public service impacts under the Reduced Development Alternative would be less than those under the Project. (*Less*)

TRANSPORTATION/TRAFFIC

Similar to the Project, this alternative would not result in any significant transportation impacts on transit, bicycle, or pedestrian facilities or emergency access. Proposed transit, bicycle, and pedestrian facilities and emergency access as part of the Project would be developed under this alternative. The VMT memo prepared for the Project calculated the estimated net daily VMT generated by Phase 1 of the Project by calculating the difference between the Sacramento Zoo daily VMT and the New Zoo daily VMT during opening year. Both visitor and employee trips were included in the VMT analysis assuming an annual visitor attendance of approximately 508,000. Total daily VMT for Phase 1 of the New Zoo was determined to be 15,339. Daily VMT from the existing Sacramento Zoo is 14,171. Therefore, this alternative would result in a net increase in daily VMT of 1,168, or an 8 percent increase compared to existing conditions. For detailed information regarding trip generation and VMT methodology and analysis see Appendix H. Because this alternative would result in an increase of net daily VMT, impacts under this alternative to VMT from Phase 1 would be significant, similar to the Project. As with the Project, impacts would remain significant and unavoidable because all feasible mitigation measures would not be sufficient to reduce daily VMT under this alternative by 1,168. Although impacts under this alternative would be less than the Project, impacts would similarly be significant and unavoidable. *(Less, but the impacts would remain significant and unavoidable)*

UTILITIES AND SERVICE SYSTEMS

The Project would result in less than significant environmental impacts associated with water supply, wastewater service, and solid waste generation. Because the size of the New Zoo would be reduced under the Reduced Development Alternative, water supply, wastewater, and solid waste demands under this alternative would be less than under the Project. Therefore, impacts on utilities and service systems under the Reduced Development Alternative would be less than under the Project. (*Less*)

6.4.3 Alternative 3: New Site Location Alternative

Under Alternative 3, the New Zoo proposed for the Project would be located at the site of the approximately 120 acre Elk Grove Park adjacent to State Route (SR) 99 and owned by the Consumes Community Service District. Elk Grove Park is currently developed with amenities such as a swim center, dog park, BMX track, and sports fields. Existing amenities at the park would be removed to accommodate the New Zoo at this location. This off-site alternative location was identified because of its proximity to SR 99 and it is large enough to accommodate the New Zoo. Under the New Site Location Alternative, the New Zoo SPA would be applied to the site.

AESTHETICS

This alternative would include levels of construction activities similar to those that would occur under the Project. Therefore, this alternative would also introduce new lighting, especially at night, that could adversely affect nearby residents. Construction of the New Zoo and associated facilities would significantly alter the visual character and quality of the area from a park to zoo facility. The overall massing of zoo facilities would result in more development than currently on the site that is mostly park land. Thus, visual impacts under the New Site Location Alternative would be greater than those under the Project. (*Greater*)

AIR QUALITY

Similar to the Project, this alternative would include construction of the New Zoo, but unlike the Project, it would include construction emissions associated with demolition of the Elk Grove Park. As with the proposed Project, this alternative would result in less-than-significant construction-related emissions with the application of Project mitigation measures. Both this alternative and the Project would result in less than significant impacts related to operation-related emissions. Although this alternative would result in similar operational emissions, increased construction emissions from demolition under this alternative would result in greater air quality emissions. (*Greater*)

BIOLOGICAL RESOURCES

The New Site Location Alternative would result in the same level of ground disturbance as the Project. However, although partially developed the Elk Grove Park has portions of undeveloped land that may support special status species. Additionally, the New Site Location has more trees than the Project site that would provide habitat for nesting birds and raptors. Similar to the Project, this alternative could affect foraging habitat and nesting birds and raptors during construction. This alternative would require the application of Project mitigation measures to reduce impacts to biological resources to a less-than-significant level. This impact was identified as significant but mitigable for the Project. Because issues associated with special status species would be reduced with application of Project mitigation, impacts under this alternative would be similar to those that would occur under the Project. (*Similar*)

CULTURAL, AND TRIBAL CULTURAL RESOURCES

Elk Grove Park was established in 1903 and has a rich history as the first community park in Elk Grove, and the first governed rural park district in California (Elk Grove Historical Society 2021). Therefore, demolition of the park under this alternative would have the potential to impact several historic resources. Historical resources impacts for this alternative would be greater than the project. The Elk Grove Park Alternative would involve the same level of earthmoving activities associated with 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. Although the Project footprint and level of construction would remain similar to the Project and there would be greater impacts to historical resources due to the history of the park. Impacts under this alternative would be greater to those under the Project. (*Greater*)

ENERGY

Under this alternative, construction activities would be similar to those proposed for the Project, except demolition would be required. New buildings and facilities would incorporate energy efficiency features similar to those as proposed for the Project. As with the Project, this alternative would not result in the long-term wasteful, inefficient, and unnecessary consumption of energy, because identified mitigation would be applied. Therefore, energy impacts under this alternative would be similar to those that would occur under the Project. (*Similar*)

GEOLOGY AND SOILS

Under this alternative, construction activities would be similar to those described for the proposed Project, including ground-disturbing and earthmoving activities, which could result in damage to and/or destruction of previously undiscovered paleontological resources. As described in Section 3.6, "Geology and Soils," impacts would be less than significant with the implementation of mitigation. Geology and soils impacts under this alternative would be similar to those that would occur under the Project. (*Similar*)

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This alternative would generate GHG emissions during construction and operation similar to those that would be generated under the Project because the same extent of site development would occur. Construction emissions would be increased as demolition would occur. However, demolition would result in an incremental increase in GHG emissions under this alternative. Therefore, this alternative and the Project would generate similar GHG emissions. (*Greater*)

HAZARDS AND HAZARDOUS MATERIALS

No significant hazard impact would occur under the Project. As with the Project, the use and handling of hazardous materials under this alternative would be consistent with federal, State, and local regulations, which would minimize the potential for upset or accident conditions or exposure to nearby receptors. The use of hazardous materials under this alternative would be the same as under the Project because the New Zoo would be the same. Therefore, impacts on public health and safety related to hazardous materials or hazards under this alternative would be similar to those under the Project. (*Similar*)

HYDROLOGY AND WATER QUALITY

Under this alternative the amount of impervious surfaces would be similar to the Project and the potential for construction-related releases of sediment and contaminants into surface waters or groundwater, as well as stormwater generation, changes in drainage patterns, and/or flood risk would be similar. Implementation of best management practices and compliance with State and local requirements under this alternative would result in runoff and water quality during storm events similar to those under the Project. This alternative and the Project would have similar hydrology and water quality impacts. (*Similar)*

LAND USE AND PLANNING

The Project would not result in any significant land use impacts. This alternative also would not result in significant land use impacts (division of an established community or conflict with plans adopted for the purpose of avoiding or mitigating a significant effect). As with the Project, this alternative would include an SPA for the New Zoo. Further, the Project and this alternative would also be consistent with the SACOG 2020 MTP/SCS. Impacts associated with this alternative would be similar to those of the Project. (*Similar*)

NOISE AND VIBRATION

Under this alternative, construction activities would be similar to those that would occur under the Project, with the addition of demolition. However, the Elk Grove Park site is surrounded by residential development and there would be an increase in short-term construction-related noise at sensitive receptors. As with the Project, this alternative would include traffic noise, as well as new operational noise sources. Because the site includes more surrounding residences as compared to the Project site additional receivers would be exposed to operational noise sources. Project impacts were determined to be less than significant with mitigation and the same mitigation would apply. This alternative would result in noise increased impacts as compared to those of the Project as more noise receptors would be impacted. (*Greater*)

PUBLIC SERVICES AND RECREATION

The Project would not result in any significant public service or recreation impacts that would involve the construction of new facilities. This alternative would have similar public service needs as the Project and public services impacts would be similar. However, under this alternative the Elk Grove Park would be demolished to accommodate the New Zoo. This alternative would reduce recreational opportunities in Elk Grove by replacing them with the New Zoo.

These recreational opportunities would need to be replaced elsewhere in the community at one or more locations. These replacement facilities would have their own potential impacts as a result of their construction and operation. Therefore, public service and recreation impacts would be greater under this alternative as compared to the Project. *(Greater)*

TRANSPORTATION/TRAFFIC

The Project would not result in any significant transportation impacts on transit, bicycle, or pedestrian facilities. Additionally, the Project would provide adequate emergency access. However, significant impacts related to VMT would occur as the Project would result in an increase in VMT. This alternative would generate a similar VMT as the Project due to its location near the Project site and similar size of the proposed New Zoo. Therefore, this alternative would not avoid significant and unavoidable VMT impacts. This alternative's impact on City circulation plans, policies, and standards would be similar to the Project. Therefore, transportation impacts under this alternative would be similar to the Project. (*Similar)*

UTILITIES AND SERVICE SYSTEMS

The Project would result in less than significant environmental impacts associated with water supply, wastewater, and solid waste generation. The water supply and wastewater demands and solid waste generation under this alternative would be similar to those under the Project because the size of the facilities would be the same. Therefore, impacts on utilities and service systems under this alternative would be similar to those under the Project. (*Similar*)

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project–No Development Alternative (described above in Section 5.4.1) would avoid all adverse impacts resulting from construction and operation of the Project analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the objectives the project as presented above in Section 5.2.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in Table 6-1, below, the Reduced Development Alternative would be environmentally superior action alternative because although the environmental impacts would be similar to the Project, and no significant impacts or significant and unavoidable impacts would be completely avoided, the reduced degree of development would reduce the potential impacts.

Table 6-1 Summary of Environmental Effects of the Alternatives Relative to the New Zoo Project

Environmental Topic	Project Impacts	Alternative 1: No Project – No Development Alternative	Alternative 2: Reduced Development Alternative	Alternative 3: New Site Location Alternative
Aesthetics	Less than significant	Less	Less	Greater
Air Quality	Less than significant (with mitigation)	Less	Less	Greater
Biological Resources	Less than significant (with mitigation)	Less	Less	Similar
Cultural, and Tribal Cultural Resources	Less than significant (with mitigation)	Less	Less	Greater
Energy	Less than significant	Less	Less	Similar
Geology and Soils	Less than significant (with mitigation)	Less	Less	Similar
Greenhouse Gas Emissions and Climate Change	Significant and unavoidable	Less	Less	Greater
Hazards and Hazardous Materials	Less than significant	Less	Similar	Similar
Hydrology and Water Quality	Less than significant	Less	Less	Similar
Land Use and Planning	Less than significant	Less	Similar	Similar
Noise	Less than significant (with mitigation)	Less	Less	Greater
Public Services and Recreation	Less than significant	Less	Less	Greater
Transportation/Traffic	Significant and unavoidable (VMT impacts)	Less	Similar	Similar
Utilities and Service Systems	Less than significant	Less	Less	Similar