

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

- ▶ create a physical environment that supports the growth of 21st century employment opportunities;
- ▶ develop walkable communities with amenities that attract and retain businesses and residents;
- ▶ update the City's VMT thresholds consistent with the most recent model while maintaining consistency with the policy provisions of the Mobility Chapter of the General Plan for efficient transportation systems in the City;
- ▶ refine the requirements for General Plan EIR Mitigation Measure MM 5.5.1a and MM 5.5.1b to improve its implementation; and
- ▶ establish design and implementation provisions for Segments A2 and C of the Capital SouthEast Connector.

5.2.2 Environmental Impacts of the General Plan Amendments and Update of Vehicle Miles Traveled Standards Project

Sections 3.1 through 3.10 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 SEIR and summarized below. If an environmental issue area analyzed in this Draft SEIR is not addressed below, it is because no new significant impacts were identified for that issue area beyond the General Plan EIR.

- ▶ Impact 3.2-2: Operational Air Quality
- ▶ Impact 3.5-1: Project Generated Greenhouse Gas (GHG) Emissions
- ▶ Impact 3.6-2: Increased Traffic Noise
- ▶ Impact 4-3: Cumulative Air Quality Impacts
- ▶ Impact 4-6: Cumulative GHG Emissions
- ▶ Impact 4-8: Cumulative Traffic Noise Impacts

AIR QUALITY

Impact 3.2-2: Impact 5.3.2 and 5.3.6 of the General Plan EIR determined that long-term operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5} would be substantial and could substantially contribute to a violation of the NAAQS and CAAQS for ozone and PM and conflict with air quality attainment efforts. As determined in the General Plan EIR, emissions would exceed SMAQMD's thresholds of significance and this impact was concluded to be significant and unavoidable. Development facilitated by the Project would result in emissions that would further exceed the SMAQMD thresholds of significance. Additional residential development and population growth anticipated by the Project would increase emissions as compared to the General Plan. This would be a substantial increase in the impact of severity that was previously identified in General Plan EIR Impact 5.3.2 and 5.3.6. No additional mitigation measures are available to reduce this impact; thus this impact would be significant and unavoidable.

GREENHOUSE GAS EMISSIONS

Impact 3.5-1: Impact 5.7.2 of the General Plan EIR evaluated the General Plan's potential to conflict with long-term statewide GHG reduction goals for 2050. The General Plan EIR determined that development under the General Plan had the potential to conflict with statewide GHG reduction goals for 2050 because the measures of the CAP would only be sufficient to reduce GHG emissions to 2.9 MTCO₂ per capita. Impact 5.7.2 found the General Plan to have significant and unavoidable climate change impacts. Development facilitated by the Project would result in emission that would exceed those estimated under the General Plan. The City's current CAP does not account for carbon neutrality and is insufficient to meet 2045 and 2050 targets for GHG emissions. While the City is in the process of updating their CAP to meet the most recent regulatory requirements, development facilitated by the Project may conflict with statewide reduction goals for 2045 and 2050. Impacts were determined to be significant and unavoidable in the General Plan EIR. The Project would have a substantial increase in the impact of severity that was previously identified in General Plan EIR Impact 5.7.2. No additional mitigation measures are available to reduce this impact; thus this impact would be significant and unavoidable.

NOISE

Impact 3.6-2: Impact 5.10.2 of the General Plan EIR identified that implementation of the General Plan would result in a significant increase in transportation noise, including traffic noise levels along many existing roadways in the City. As determined by the General Plan EIR, buildout of the General Plan would increase traffic noise at all roadway segments above the City's exterior noise standard (60 dB L_{dn}) for residential and other noise-sensitive land uses. Impacts from traffic noise were determined to be significant and unavoidable. Implementation of the Project would result in further increases in traffic noise levels on several roadway segments (see Table 3.6-11 in Section 6, "Noise") as compared to the General Plan. This would be a substantial increase in the impact of severity that was previously identified in General Plan EIR Impact 5.10.2. No mitigation measures are available to reduce this impact; thus this impact would be significant and unavoidable.

CUMULATIVE IMPACTS

Impact 4-3: Cumulative Air Quality Impacts. General Plan EIR Impact 5.3.7 identified that implementation of the General Plan would exacerbate existing regional problems with criteria air pollutants and ozone precursors that would result in a significant and unavoidable cumulative impact. The Project would generate a substantial increase in operational air quality emissions in exceedance of the SMAQMD thresholds. Additional residential development and population growth anticipated by the Project in addition to regional development would increase emissions as compared to the General Plan. The Project's contribution to this impact would be substantial increase in the impact of severity than was previously identified in General Plan EIR and thus a cumulatively considerable and unavoidable impact.

Impact 4-6: Cumulative GHG Impacts. General Plan EIR Impact 5.7.2 identified that implementation of the General Plan would conflict with long-term statewide GHG reduction goals for 2050. The Project would generate a substantial increase in GHG emissions as compared to the General Plan. The discussion of GHG impacts associated with the Project is inherently a cumulative impact analysis as no single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. The Project's contribution to this impact would be substantial increase in the impact of severity than was previously identified in General Plan EIR and thus a cumulatively considerable and unavoidable impact.

Impact 4-8: Cumulative Noise Impacts. General Plan EIR Impact 5.10.2 evaluated whether implementation of the General Plan, in combination with surrounding development, would result in a traffic noise impact. The Project would generate a substantial increase in traffic noise levels above those anticipated under the General Plan buildout because the Project would result in new trips on area roadways. The discussion of traffic noise impacts associated with the Project is inherently a cumulative impact analysis as it compares the Project to General Plan trips associated with buildout of the City and surrounding areas. The Project's contribution to this impact would be substantial

increase in the impact of severity than was previously identified in General Plan EIR and thus a cumulatively considerable and unavoidable impact.

5.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6l 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 Ca¹4th 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.App⁴th 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 Alternative Location for the LEA Community Plan

This alternative would include the LEA Community Plan Area in another area of the City. An offsite location for development proposed as part of the LEA Community Plan would reduce impacts associated with land coverage, based on the conversion of existing parcels in the LEA Community Plan Area to a denser land use. This alternative was rejected as it would not meet the Project objective to enhance land uses along the Kammerer Road corridor.

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 2019 General Plan. The LEA Community Plan Area, Old Town Policy Area, South Study Area, and West Study Area would retain their current General Plan and zoning designations. In addition, roadway improvements would not occur along Grant Line Road as detailed in the Precise Plan. And General Plan EIR Mitigation Measure MM 5.5.1a and MM 5.5.1b would remain as currently written in the General Plan EIR.
- ▶ **Alternative 2: Lent Ranch Alternative** includes retaining the existing zoning and land use designations in the Lent Ranch Policy Area.
- ▶ **Alternative 3: Reduced Project Alternative** includes removing the area south of Kammerer Road from the LEA Community Plan and retaining the existing zoning and land use designations in the Old Town Policy Area.

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 General Plan, including recent amendments adopted for the 2021 Housing Element and the Safety Element. No land use or zoning changes to implement the LEA Community Plan Area, Old Town Policy Area, South Study Area, or West Study Area would be made. Adopted General Plan mitigation measures MM 5.5.1a and MM 5.5.1b would not be modified under this alternative. The Form Based Code designed for the LEA Community Plan Area would not be adopted. In addition, Grant Line Road would not be realigned as envisioned in the Precise Plan. The No Project Alternative 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: Lent Ranch Alternative

Under the Lent Ranch Alternative, existing zoning and land uses within the Lent Ranch Policy Area would remain as described in the General Plan. Other aspects of the Project (LEA Community Plan Area west of the Lent Ranch Policy Area, Old Town Policy Area, South and West Study Areas, Precise Plan, VMT updates, and adopted General Plan Mitigation Measure MM 5.5.1a and MM 5.5.1b) would remain the same as analyzed throughout this SEIR. The Lent Ranch Policy Area is approximately 295 acres in the eastern portion of the Project proposed LEA Community Plan Area located north of Kammerer Road and west of State Rout (SR) 99. The Lent Ranch Policy Area is covered by a Development Agreement that is valid until 2025 and the terms of the agreement would remain for this alternative. Under this alternative the Lent Ranch Policy Area would retain the General Plan use designations of Commercial, Commercial/Office, and High Density Residential and zoning designation of Special Plan Area. The remainder of the LEA Community Plan would be implemented as proposed for the Project. This alternative would result in an increase in commercial and office development and a decrease in transect based residential development as proposed by the Project. This alternative would include development of 280 residential units and 280 acres of commercial/office development. Therefore, this alternative would result in a reduction in development density as compared to the Project, which would include development of over 300 residential units in the Lent Ranch Policy Area.

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, there would be less dense development as the Lent Ranch Policy Area would retain the existing General Plan land use designations. Buildings would not be as tall as compared to the Project reducing potential shadow and visual effects. Transect based development would not occur, including development of proposed Center 3, resulting in less dense development affording more views of the surrounding landscape. Thus, development of Alternative 2 would result in less of an impact related to changes to the existing visual character of the area, as well as fewer 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 significant and unavoidable impacts related to air emissions during operation. Under the Lent Ranch Alternative, 280 residential units and 280 acres of commercial/office land uses would be developed. This would be a reduction in development as compared to

the Project. This alternative 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 result in reduced development potential in the Lent Ranch Policy Area. However, the development proposed under this Alternative would still emit a substantial amount of operational emissions as compared to the General Plan EIR. *(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 Lent Ranch 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 reduce development in the Lent Ranch Policy Area as compared to the Project, including less residential development. Although this alternative would reduce the intensity of operations in the LEA Community Plan Area, site disturbance would be similar as the Project because Lent Ranch Policy Area would still allow for commercial/office and residential development under their current General Plan land use designations. Therefore, the impacts under the Lent Ranch Alternative would be similar to those under the Project. *(Similar)*

ENERGY

As discussed in Section 3.4, "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 Lent Ranch Alternative would not result in significant energy impacts. However, this Alternative would have lower energy demands as compared to the Project because of the reduced development potential in the Lent Ranch Policy Area. Therefore, energy impacts under the Lent Ranch Alternative would be less than those under the Project. *(Less)*

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As discussed in Section 3.5, "Greenhouse Gas Emissions and Climate Change," the Project would result in significant and unavoidable impacts related to GHGs and climate change. Under the Lent Ranch 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 Lent Ranch Policy Area would have the same development footprint. However, development facilitated by the Project would still have the potential to conflict with statewide reduction goals for 2045 and 2050. GHG operation-related emission impacts under the Lent Ranch Alternative would be less than under the Project, but remain significant and unavoidable. *(Less)*

NOISE AND VIBRATION

As discussed in Section 3.6, "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, and significant and unavoidable impacts related to traffic noise. Future development under the Lent Ranch 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 Lent Ranch Alternative would be less intense than under the Project, it is expected that the reduction in development potential would result in lower traffic noise impacts on Kammerer Road as compared to the Project. However, traffic noise on other roadway segments throughout the City, such as Laguna Boulevard would continue to exceed City noise standards. Although impacts would be slightly less than the Project, impacts would remain significant and unavoidable. *(Less)*

POPULATION AND HOUSING

As discussed in Section 3.7, "Population and Housing," of this Draft SEIR, the Project would accommodate up to 1,851 new dwelling units and approximately 5,979 new residents. This growth would exceed projections assumed under the City's General Plan and regional planning efforts completed by SACOG. The Lent Ranch Alternative would include reduced residential development and increased commercial/office land uses. Therefore, the number of dwelling units and anticipated population growth under this alternative would result in fewer impacts to population and housing as compared to the Project. (*Less*)

PUBLIC SERVICES AND RECREATION

As discussed in Section 3.8, "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 residential units than anticipated by the Project, there would be 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 school construction and associated environmental impacts 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 Lent Ranch Alternative, a reduced amount of residential units would reduce the number of students needing school facilities as compared to the Project. However, even under the Lent Ranch Alternative, additional students would be generated as compared with the General Plan. Thus, while the Lent Ranch 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 Lent Ranch Alternative, it would be less than under the Project. (*Less*)

TRANSPORTATION

As discussed in Section 3.9, "Transportation," of this Draft SEIR, the Project would result in significant and unavoidable impacts related to VMT. Reduced development under the Lent Ranch Alternative would result in a reduction in estimated total daily VMT as compared to the Project because this alternative would have less development. However, population growth under the Lent Ranch Alternative would be less than the project likely resulting in a similar VMT per service population as the Project. Similar to the Project VMT modeling and estimates for this alternative are not directly comparable to the those contained within the General Plan. All applicable General Plan policies would apply and consistent with the determination in the General Plan, no additional feasible mitigation is available beyond compliance with those General Plan policies. Therefore, while the impact would remain significant and unavoidable under the Lent Ranch Alternative, it would be slightly less than under the Project for total daily VMT. (*Less*)

UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.10, "Utilities and Service Systems," of this Draft EIR, the Project would result in less-than-significant impacts related to utilizes and service systems. Because the Lent Ranch 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 Lent Ranch 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*)

5.4.3 Alternative 3: Reduced Project Alternative

Under the Reduced Project Alternative the land uses south of Kammerer Road within the LEA Community Plan would retain their existing General Plan land use designations and zoning. Old Town Policy Area would also retain its existing land use and zoning designations. The rest of the Project (South and West Study Areas, Precise Plan, VMT updates, and General Plan EIR Mitigation Measure MM 5.5.1a and MM 5.5.1b) would remain the same as analyzed throughout this SEIR. The existing area south of Kammerer Road in the LEA Community Plan Area would retain its Activity District land use as part of the South Study Area. Permitted land uses in the Activity District include Community Commercial, Regional Commercial, Light Industrial/Flex, Heavy Industrial, High Density Residential, and Public Services. Development in the Old Town Policy Area under the Reduced Project Alternative would continue with existing land uses and zoning designations. This alternative would result in reduced development density as compared to the Project, which would include residential development throughout the area south of Kammerer Road and in the Old Town Policy Area.

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, there would be less dense development as the area south of Kammerer Road would retain the existing General Plan land use designations. Buildings would not be as tall and development would not be as intense as envisioned by the Project. In the Old Town Policy Area development would continue to be consistent with the distinct historic character of the area and would not be as intense as envisioned by the Project. Thus, development of Alternative 3 in accordance with 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 fewer 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 significant and unavoidable impacts related to air emissions during operation. Under the Reduced Project Alternative, there would be commercial, industrial, and public services development and a reduction in residential development south of Kammerer Road and overall reduced development in the Old Town Policy Area. This would be a reduction in development density as compared to the 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 less development than the Project. However, the development proposed under this Alternative would still emit a substantial amount of operational emissions as compared to the General Plan EIR and impacts would remain significant and unavoidable. (*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 Project 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 reduce development density in the area south of Kammerer Road and in the Old Town Policy Area as compared to the Project, including less residential development. Although this alternative would reduce the intensity of operations in the LEA Community Plan Area and Old Town Policy Area, site disturbance would be similar as the Project because this alternative would still allow for commercial, industrial, and residential development under their current General Plan land use designations. Therefore, the impacts under the Lent Ranch Alternative would be similar to those under the Project. (*Similar*)

ENERGY

As discussed in Section 3.4, “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 Project Alternative would not result in significant energy impacts. However, this Alternative would have lower energy demands as compared to the Project because of the reduced intensity of use that would be developed with residential units. Therefore, energy impacts under the Reduced Project Alternative would be less than those under the Project. *(Less)*

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As discussed in Section 3.5, “Greenhouse Gas Emissions and Climate Change,” the Project would result in significant and unavoidable impacts related to GHGs and climate change. Under the Reduced Alternative, the intensity of site development south of Kammerer Road and within the Old Town Policy Area 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 south of Kammerer Road and the Old Town Policy Area would have the same development footprint. However, development facilitated by the Project would still have the potential to conflict with statewide reduction goals for 2045 and 2050. GHG operation-related emission impacts under the Reduced Project Alternative would be less than under the Project, but remain significant and unavoidable. *(Less)*

NOISE AND VIBRATION

As discussed in Section 3.6, “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, and significant and unavoidable impacts related to traffic noise. Future development under the Reduced Project 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 Project Alternative would be less intense than under the Project, it is expected that the reduction in new dwelling units and intensity of land uses would result in lower traffic noise impacts on Kammerer Road and Kammerer Road extension as compared to the Project. However, traffic noise on other roadway segments throughout the City, such as Laguna Boulevard are anticipated to continue to exceed City noise standards. Although impacts would be slightly less than the Project, impacts would remain significant and unavoidable. *(Less)*

POPULATION AND HOUSING

As discussed in Section 3.7, “Population and Housing,” of this Draft SEIR, the Project would accommodate up to 1,851 new dwelling units and approximately 5,979 new residents. This growth would exceed projections assumed under the City’s General Plan and regional planning efforts completed by SACOG. The Reduced Project Alternative would include less residential development and increased commercial, industrial, and public services land uses. Therefore, the number of dwelling units and anticipated population growth under this alternative would result in fewer impacts to population and housing as compared to the Project. *(Less)*

PUBLIC SERVICES AND RECREATION

As discussed in Section 3.8, “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 residential units than anticipated by the Project, there would be 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 Project Alternative, there would be less residential units, which would reduce the number of students generated as compared to the Project. However, even under the Reduced Project Alternative, additional students would be generated as compared to the General Plan. Thus, while the Reduced Project 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 Project Alternative, it would be less than under the Project. *(Less)*

TRANSPORTATION

As discussed in Section 3.9, “Transportation,” of this Draft SEIR, the Project would result in significant and unavoidable impacts related to VMT. Reduced development under this alternative would result in a reduction in estimated total daily VMT as compared to the Project because this alternative would have less development. However, population growth under the Reduced Project Alternative would be less than the Project likely resulting in a similar VMT per service population as the Project. Similar to the Project VMT modeling and estimates for this alternative are not directly comparable to the those contained within the General Plan. All applicable General Plan policies would apply and consistent with the determination in the General Plan, no additional feasible mitigation is available beyond compliance with those General Plan policies. Therefore, while the impact would remain significant and unavoidable under the Reduced Project Alternative, it would be less than under the Project for total daily VMT. *(Less)*

UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.10, “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 Project Alternative would not include as many new residential units as the proposed Project south of Kammerer Road and in the Old Town Policy Area, this alternative would be expected result in lower demand for utilities and service systems. Thus, while both the Project and the Reduced Project 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 Project Alternative would be the environmentally superior action alternative as it would involve the least amount of development.

Table 5-1 Summary of Environmental Effects of the Alternatives Relative to the Project

Environmental Topic	Alternative 1: No Project Alternative	Alternative 2: Lent Ranch Alternative	Alternative 3: Reduced Project Alternative
Aesthetics	Less	Less	Less
Air Quality	Less	Less	Less
Archaeological, Historical, and Tribal Cultural Resources	Less	Similar	Similar
Energy	Less	Less	Less
Greenhouse Gas Emissions and Climate Change	Less	Less	Less
Noise	Less	Less	Less
Population and Housing	Less	Less	Less
Public Services	Less	Less	Less
Transportation	Less	Less	Less
Utilities and Service Systems	Less	Less	Less

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