

PURPOSE

This section of the EIR provides a comparative analysis of the merits of alternatives to the proposed project pursuant to Section 15126(d) of the State CEQA Guidelines, as amended. According to the Guidelines, the discussion of alternatives should focus on alternatives to a project or its location, which can avoid or substantially lessen the significant effects of the project. The CEQA Guidelines indicate that the range of alternatives included in this discussion should be sufficient to allow decision-makers a reasoned choice. The alternative discussion should provide decision-makers with an understanding of the merits and disadvantages of these alternatives.

INTRODUCTION

As discussed above, the purpose of the alternatives analysis is to avoid or minimize significant effects of the project. According to the CEQA Guidelines, the EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. When addressing feasibility, the CEQA Guidelines Section 15126.6 states that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency..., jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites.” The CEQA Guidelines also specifies that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the proposed project.

Therefore, based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed project; (2) ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and (4) the feasibility of the alternatives. These factors will be unique for each project.

The alternatives to the proposed Lent Ranch Marketplace ultimately selected for analysis in this EIR were developed with the aim of minimizing environmental impacts while still meeting the basic objectives of the project. The project applicant has defined the following objectives for this proposed project:

- To construct a regional mall with supporting retail, office and commercial services along the Highway 99 corridor that will accommodate the existing and future demand for such services in the City.
- To construct a commercial complex of sufficient size and land use mix that maximizes synergy on-site between commercial, office, retail and high density residential opportunities in the City.
- To reduce overall vehicle miles traveled by City residents to access commercial opportunities in the region, and hence reduce vehicular air and noise emissions, by providing a retail environment unavailable within a radius of 10 miles.
- To create a high-quality commercial, office, retail and entertainment development which encourages a sense of place and social interaction in the City.
- To create a high-quality comprehensive and fully integrated commercial, office, retail and entertainment development on one site rather than development of less desirable fragmented land uses spread out over several other locations.
- To provide a pleasing urban landscape that will enhance the aesthetic and visual quality of the area, on a site that is designated in the General Plan for Urban Development.
- To promote development in an orderly and cohesive manner for the entire project site and prevent the piecemeal development of the site with a mix of incompatible uses which could otherwise result.
- To provide an expanded economic base for the City by generating substantial property and sales tax and fee revenue.
- To develop a regional marketplace to attract fashion department stores, specialty uses that are not currently represented in the City.
- To provide employment opportunities for City residents.
- To provide the infrastructure necessary to meet project needs in an efficient and cost-effective manner.
- To provide safe and convenient customer access by locating the project immediately adjacent to an existing regional interchange with Highway 99 and major roadways.
- To provide multi-family housing opportunities.
- To provide regional retail services not currently available to the City by the end of 2003.
- To locate the proposed project on an already disturbed site thereby minimizing direct impacts to sensitive biological resources.

ALTERNATIVES EVALUATION

Based on the environmental analysis, alternatives were developed which would provide decision-makers with a reasonable range of alternatives with which to compare to the proposed project. A list of the alternatives selected for evaluation in this analysis is provided below.

- Alternative 1 - No Project Alternative, including the No Project, No Development Alternative (Alternative 1a), and the Planning and Zoning Code Alternative (Alternative 1b);
- Alternative 2 – Modified Use Mix Alternative A;
- Alternative 3 – Modified Use Mix Alternative B;
- Alternative 4 -Reduced Density Alternative; and
- Alternative 5- Off-Site Alternative.

It should also be noted that an alternative was considered that would theoretically eliminate the significant operational air quality impact of the proposed project (this alternative would also reduce the magnitude of the proposed project's impacts to biological resources through a reduced development footprint). However, this alternative was ultimately rejected from consideration because the project would have to be reduced in scale to such an extent as to render it economically infeasible. In order to reduce the amount of all modeled air emissions to a level below the air quality thresholds for significance without the need for mitigation, only a relatively small amount of development could occur on the 295-acre site. As shown in **Table 6.0-1** below, such an alternative would be approximately 23 percent the scale of the proposed project. This would theoretically result in a regional mall approximately 304,000 sf in size. Not only would a mall of this size be far too small to attract the types of tenants required to lease a mall site and finance construction of the facility, it could not be considered a mall; such a facility would be the size of a big box home center (e.g., Home Depot, etc.). Nor could such a facility attract the supporting commercial and office uses that would create a cohesive and entertaining project.

**Table 6.0-1
Theoretical Air Quality Alternative**

Planning District	Parcel(s)	General Land Use	Acres (gross)	Units	Zoning	Maximum Sq. Ft. ¹
A	A	Regional Shopping Mall	105.8		SPA-SC	304,000
B	B,C,D	Community Commercial	85.4		SPA-SC	209,000
C	E,H	Neighborhood Commercial	26.7		SPA-SC	64,000
D	G	Office and Entertainment	30.6		SPA-GC	74,000
E	I,J,K	Visitor Commercial	31.0		SPA-GC	70,000
F	F	Multi-Family Residential	15.3	65	SPA-RD-20	
		TOTAL	294.8	65		721,000

¹ Square footage and dwelling units are approximate.

Because such an alternative could not be built, many of the project objectives presented in the EIR project description would not be met. It is for these reasons that this alternative is considered infeasible.

In addition to air quality, the proposed project would also significantly impact agricultural resources in the City. The only alternative that would eliminate the proposed project's unavoidably significant agricultural impact is the No Project Alternative, which is described and addressed below.

Alternative 1 – No Project Alternative

The No Project Alternative is required by Section 15126 (2)(4) of the CEQA *Guidelines*. As required by the Guidelines, the analysis must examine the impacts which might occur if the site is left in its present condition, as well as what may be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

No Project, No Development Alternative (Alternative 1a)

The "No Project" No Development alternative would leave the project site in its present condition. Existing agricultural operations would remain along with the four existing residences. With the exception of water consumption, none of the impacts associated with construction and operational activities would occur if the no project alternative were selected. No additional vehicle trips would be generated over present conditions, nor would noise and air quality impacts occur with selection of this alternative. In addition, this alternative would have no impact with regard to visual resources, land use, public services (except water consumption), energy, utilities, land use, hazardous materials, biological resources or cultural resources.

Regarding water demand, the proposed project would result in a lesser amount of on-site water consumption than does the site under agricultural production. Consequently, from the perspective of water consumption, the proposed project is environmentally superior to the No Development Alternative.

This alternative is environmentally superior to the proposed project in all respects but water consumption. However the No Development Alternative would not meet any of the project objectives.

Planning and Zoning Code Alternative (Alternative 1b)

Under this Alternative, the existing zoning of the project site is AG-80 - 80-acre minimum lot size, and the property is in active agricultural cultivation. Infrastructure on the property is limited to that necessary to support the four existing on-site residences. Development of the project site consistent with the existing zoning designations and capacity of existing on-site infrastructure would allow for 4 single family units throughout the 295-acre site. The remainder of the site would remain in agricultural production. Consequently, impacts associated with this alternative are essentially the same as those described above under the No Project No Development Alternative (1a). As with Alternative 1a, this alternative would be environmentally superior to the proposed project in all respects but water consumption. However the Planning and Zoning Code Alternative would not meet any of the project objectives.

Alternative 2 – Modified Use Mix Alternative A

Under this alternative, the site would be general planned and zoned for a mix of urban uses including single family and multi-family residential uses, commercial uses, and a park. The 295-acre project site would also be developed generally consistent with the Urban Development Area designation identified in the City of Elk Grove General Plan. However, a General Plan Amendment would still be required from Urban Development Area (UDA) to single family residential (SFR), medium density residential (MDR), and commercial and office (C&O), as would a zone change from Agriculture (AG-80) to RD-5, RD-20, and SC. In addition, Alternative 2 would also require an amendment to the General Plan Transportation Diagram to reflect interior project roadways as appropriate. The development footprint would remain similar to that of the proposed project. However, as shown on **Figure 6.0-1**, the mix of uses on the property has been modified toward a more residential character. The following uses would be developed under Alternative 2:

Land Use	Acres	Dwelling Units/ Square feet	Zoning	GP Designation
Single Family Residential (5 du/acre)	247	1,235 du	RD-5	SFR
Multi-Family Residential (20 du/acre)	20	400 du	RD-20	MDR
Park	13	--	RD-5	OS
Commercial	15	163,350 sf	SC	C&O
	295	1,635 du; 163, 350 sf	--	--

Agricultural Resources

Both the project and this alternative would develop 285 acres of land for urban uses and 8 acres for a detention basin that has been historically cultivated. Since the development footprint is similar between the two, both are considered to have an equal degree of impact to agricultural resources. Thus, neither the proposed project nor Alternative 2 is considered environmentally superior with respect to agricultural resources.

Transportation and Circulation

Implementation of Alternative 2 would result in a decrease in project-generated traffic. Specifically, using ITE Trip Generation Manual factors, average daily trip generation on the project site would decrease from approximately 63,880 daily trips with the proposed project to approximately 14,107 daily trips (a 78 percent decrease). Peak hour a.m. trips would decrease from 1,380 to 1,205, and p.m. peak hour trips would decrease from 6,230 to 1,691. Because Alternative 2 would result in less traffic impacts on local roadways and would, therefore, require fewer roadway improvements off the project site than the project, Alternative 2 would be environmentally superior to the project with respect to traffic and circulation impacts. However, development of Alternative 2 would not result in the same reduction in vehicle miles traveled by City residents that would occur under the proposed project.

Air Quality

Because similar on-site grading would occur under Alternative 2, the total amount of grading and construction-related air quality impacts would be similar to those of the project. However, Alternative 2 proposes a different mix of land uses than that identified for the proposed project. The comparative effect of these development alternatives on air emissions is provided below.

Emissions Source	Emissions in Pounds per Day		
	ROG	NO _x	PM ₁₀
Proposed Project	258.04	363.08	209.82
Alternative 2	97.81	122.56	86.63
Recommended SMAQMD Thresholds	85.0	85.0	275

Source: *Impact Sciences, Inc., July 2000.*

As shown, Alternative 2 would generate less ROG, NO_x and PM₁₀ air emissions on a daily basis than the proposed project due to the reduction in commercial development proposed under this alternative.

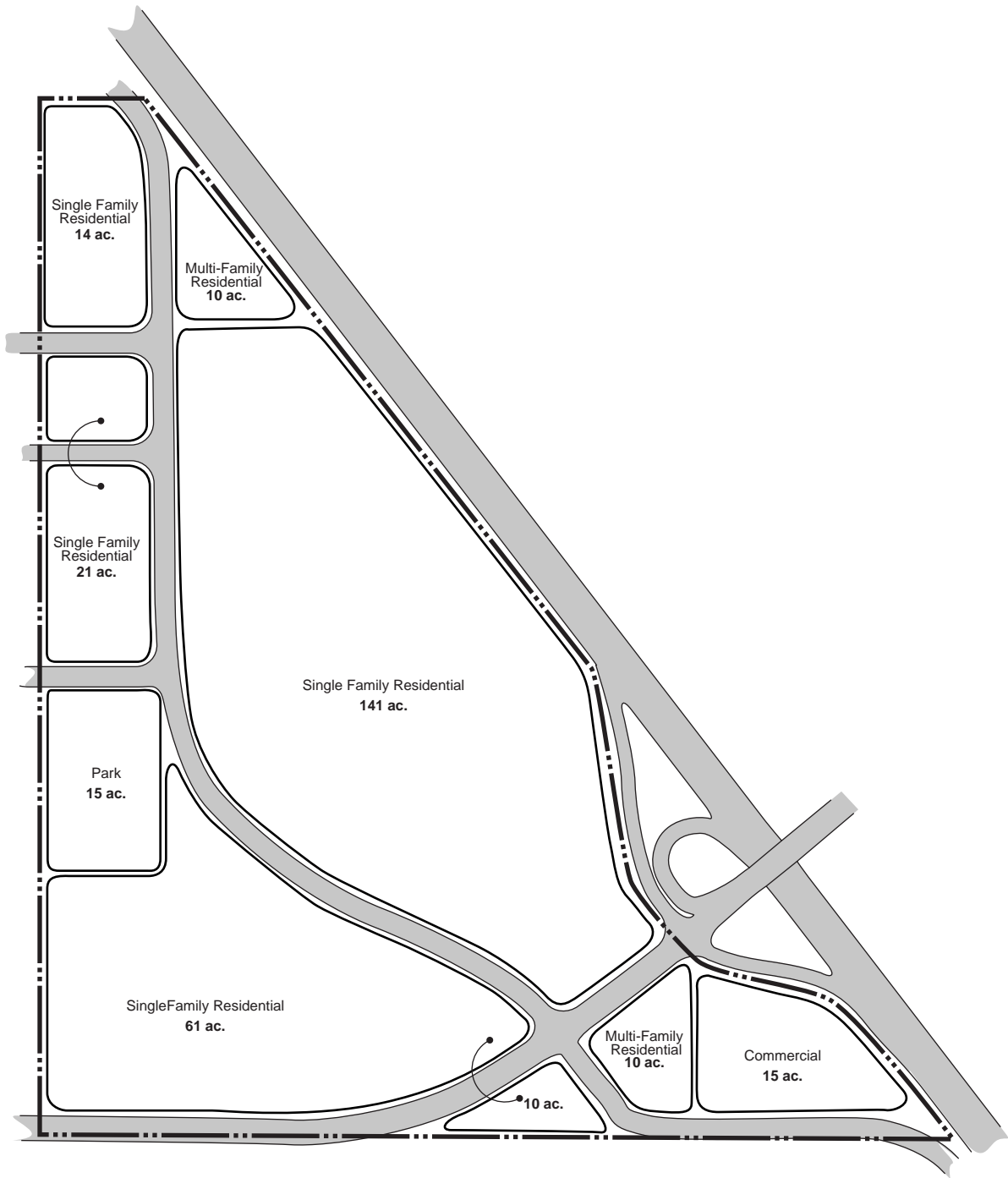


FIGURE **6.0-1**

Alternative 2-Modified Mixed Use Alternative "A"

Therefore, Alternative 2 would be environmentally superior to the proposed project with respect to air quality.

Noise

With a decrease in the number of vehicle trips introduced onto the local roadway network, there would be an associated decrease in project-generated noise impacts on and in the vicinity of the site due to project-generated vehicular traffic. This is particularly the case in this instance, where delivery trucks traveling to and from the commercial uses on-site would be reduced in number and partially replaced by automobiles. Moreover, it is likely that point source noise would be reduced under this alternative, as loading and off-loading of goods and supplies for the commercial uses under the proposed project would be reduced in frequency and volume. Therefore, Alternative 2 would be environmentally superior to the project with respect to noise impacts generated by the proposed project. However, a residentially oriented alternative such as this would potentially locate residential land uses closer to SR-99, exposing future residents of the site to the relatively high noise levels generated by vehicular traffic on the freeway. Given that noise-sensitive residential land uses that could occur under this Alternative would be exposed to relatively high freeway-generated noise levels, Alternative 2 is not environmentally superior to the proposed project with respect to noise impacts generated by off-site noise sources.

Environmental Hazards

Given the similar overall development footprint between the proposed project and Alternative 2, and because development under this alternative would also place developed uses near potential off-site hazards when compared with the proposed project, Alternative 2 impacts associated with environmental hazards are similar to those of the proposed project. Given the above, neither Alternative 2 nor the proposed project is considered environmentally superior with respect to environmental hazards.

Public Services and Utilities

a) Water Resources

The demand for water resources would be greater under Alternative 2 than under the proposed project due to the greater number of residential uses associated with this alternative. Water consumption for Alternative 2 would be 1,274 acre-feet per year compared to 1,026 acre-feet per year of water that the proposed project would require from potable water supplies. Off-site infrastructure would be necessary

to serve either the proposed project or this alternative. Because Alternative 2 would consume more water than the proposed project, it would not be environmentally superior to the project with respect to water resources.

b) Wastewater Disposal

Wastewater generation for Alternative 2 would be 1.27 mgd compared to 0.59 mgd under the project. As with the proposed project, this wastewater would be treated at the SRCSD regional water reclamation plant (WRP). Off-site infrastructure would be necessary to serve either the proposed project or this alternative. Because more wastewater from the project site would go to the WRP, this alternative would have a greater impact on the treatment facility and conveyance facilities than would the proposed project and is, therefore, not environmentally superior to the proposed project with respect to impacts on wastewater disposal.

c) Solid Waste Disposal

At buildout, the project would generate approximately 7,746 tons of solid waste per year. In comparison, Alternative 2 would generate 2,161 tons of solid waste annually. Given that less solid waste would be generated by uses developed under Alternative 2 compared to that of the proposed project, Alternative 2 would be environmentally superior to the project with respect to solid waste disposal impacts.

d) Fire Services

Site development under either the proposed project or Alternative 2 would increase the amount of human presence and the number of structures in the project vicinity; creating a new demand for fire protection and emergency services. However, Alternative 2 would create a greater permanent population on-site than under the proposed project, since this alternative contains 1,235 dwellings versus the 280 units of the proposed project. With the proposed project, human presence is largely limited to day-time and evening hours (business hours), since that is when stores are open. In contrast, human presence would be more constant with construction of a residential project such as that considered by Alternative 2. In addition, large commercial structures such as those planned under the proposed project are required to have fire suppression systems such as sprinklers, whereas single family residential dwellings are not required to contain such systems. Thus, the chance for a catastrophic fire to occur on-site is reduced when compared to a residential project as considered by Alternative 2. For these reasons, it is likely that Alternative 2 would create a greater number of calls for service than would the proposed project. Consequently, the proposed project is considered superior to Alternative 2 with regard to impacts on fire protection service.

e) Police Protection/Crime Prevention

Site development under either the proposed project or Alternative 2 would increase the amount of human presence; thereby creating demands on the Police Department to respond to an increase in the number of calls to the site in either condition. However, Alternative 2 would create a greater permanent population on-site than under the proposed project, since this alternative contains 1,235 dwellings versus the 280 units of the proposed project. With the proposed project, human presence is largely limited to day-time and evening hours (business hours), since that is when stores are open. In contrast, human presence would be more constant with construction of a residential project such as that considered by Alternative 2.

In addition, the proposed project will contain security features that are designed to discourage criminal intent. As indicated in **Section 4.6, Public Services and Utilities**, uniformed, on-site security will be provided on a 24-hour basis for the proposed project. Lighting will be provided consistent with City code along all walkways and parking lots to provide safe passage for patrons. The applicant is also considering the use of closed circuit television cameras to provide full security coverage of the proposed commercial uses. None of these features would be included in a residential development such as that considered under Alternative 2. Consequently, it cannot necessarily be said that Alternative 2 is considered superior to the proposed project with regard to impacts on Police protection service.

f) Schools

Alternative 2 would generate 1,131 students compared to the 194 students that would be generated by the project. All uses that would be constructed on-site are required to pay statutory school impact fees to mitigate impacts to schools. Compliance with the fee program will mitigate impacts to the affected district regardless of the type of development proposed. However, based on impact potential without consideration to mitigation payments, the proposed project is considered environmentally superior to Alternative 2 with respect to school impacts.

g) Parks, and Recreation

Under City requirements of 5.0 acres of parkland per 1,000 persons, development of the proposed project would require the applicant to provide 2.8 acres of local parkland and/or in-lieu fees. Per the same requirements, development under Alternative 2 would require a total of 22 acres for parkland and/or in-lieu fees. As indicated in **Section 4.6.7, Parks and Recreation**, the applicant is required to pay an in-lieu fee to cover the cost generated by the increased demand for park and recreation facilities. While Alternative 2 would increase the demand for park facilities beyond that of the proposed project, Alternative 2 includes a 13-acre park within the site boundary. Further, the applicant would be required to pay an in-lieu fee to cover the 9-acre shortfall in park space associated with Alternative 2.

The combination of land credit and payment of in-lieu fees mitigates the impact on park and recreation facilities. However, from an impact perspective, Alternative 2 creates a greater demand for parkland based on the standards identified by City requirements. Therefore, Alternative 2 is not considered to be environmentally superior to the proposed project with regard to demands placed upon park and recreation facilities.

Hydrology and Water Quality

Urban runoff generated under Alternative 2 would be conveyed and discharged off site through existing and proposed drainages and drainage basins. Because a smaller development footprint would occur under Alternative 2 compared to the proposed project, there would be a smaller level of impact to groundwater recharge. This is due to the fact that with residential development comes the construction of yards, which are typically planted in pervious surfaces such as lawns, gardens, etc. Commercial developments have greater amounts of site coverage in impervious surfaces such as parking lots, rooftops, etc., than does residential development. Site development under either scenario would also reduce groundwater pumping associated with historic agricultural use on the property, which is a beneficial water supply impact.

Section 4.7, Hydrology and Water Quality, indicates that site development would increase runoff flows over present conditions. However, because the residential component of Alternative 2 would cover less surface area with impermeable material, the amount of runoff from the site would be less under Alternative 2. Therefore, Alternative 2 would be the environmentally superior alternative with respect to runoff volume.

Under either development scenario, storm and irrigation runoff could contain substances, such as pesticides, herbicides, etc. However, stormwater runoff would be required to meet the same Regional Water Quality Control Board water quality standards regardless of the uses proposed on the site, so storm runoff under either Alternative 2 or the proposed project would not significantly impact surface waters. Therefore, neither Alternative 2 nor the project is environmentally superior to the other with respect to runoff water quality.

Biological Resources

Under Alternative 2, there would be similar grading activity (disturbance to 295 acres) to that of the proposed project. Thus, direct impacts to on-site biological resources would be similar under either development scenario. The residential character of site development under Alternative 2 is more

problematic biologically, because people are generally more active outside of their homes and there is a greater opportunity for stray pets or children to interact with wildlife in adjacent and off-site open areas, thereby increasing the magnitude of indirect impacts. In contrast, the predominately commercial nature of the proposed project would result in a more transitory population, which is busy working or shopping, and is gone during the evening and at night. From a biological standpoint, Alternative 2 is not considered environmentally superior to the proposed project.

Geology and Geotechnical Hazards

Grading activity on-site would be similar to that of the proposed project, since the development footprint is the same and the same soil conditions will apply regardless of the uses proposed on the property. Furthermore, improvements constructed on the site under Alternative 2 would be subjected to the forces of ground movement (e.g., shaking buildings, etc) during seismic events similar to the proposed project, and would also be subject to the same construction requirements as the proposed project. Because site development under this alternative would require similar grading and earth movement to that of the project, and would be subject to the same seismologic forces as the proposed project, Alternative 2 is not considered to be an environmentally superior alternative to the proposed project.

Cultural Resources

The project site has yielded no evidence of prehistoric or historic occupation based on archival records search. In addition, the site has been previously disturbed by agricultural cultivation, which makes it unlikely that the site contains any undisturbed cultural resources. Further, none of the existing structures on the site are considered historically significant. Consequently, site development under either the proposed project or Alternative 2 would not create a significant cultural resource impact and neither is considered superior with respect to the other.

Visual Qualities

Implementation of either this alternative or the proposed project would result in the demolition and removal of the existing on-site structures and many of the trees presently found on-site. Following demolition, the site would be prepared through a combination of earth moving activities including excavation, grading, and compaction. These short-term impacts would occur under either development scenario.

In the long term, site development would result in the introduction of urban uses in a rural area that is undergoing urbanization. Uses on the site would be highly visible from SR-99, which contains a scenic corridor that extends onto the project site. With selection of this residential alternative, the size, scale, and massing of on-site structures would be reduced from the larger structures associated with a regional mall. It is also likely that light and glare would be incrementally reduced, since residential structures typically are constructed of stucco, wood, or brick/stone siding as opposed to reflective materials such as glass typically associated with commercial buildings. Further, residential uses tend to have more landscaping and less hardscape, since parking requirements are substantially lessened. Based on the above, Alternative 2 is considered environmentally superior to the proposed project with respect to visual impacts.

Land Use

Land use compatibility impacts associated with the agricultural operations (i.e., pesticide use, trespassing, and vandalism) to the west and south of the project site would be substantially increased under this alternative. The introduction of more residential land uses would increase the permanent site population. In addition, noise impacts due to the introduction of residential land uses along the SR-99 corridor would be greater than those of the project. Overall, this alternative would result in more land use compatibility impacts than the proposed project.

Conclusion

In conclusion, this alternative would result in greater environmental impacts in many of the environmental categories while failing to reduce several of the unavoidable significant impacts. Further, this alternative does not fully attain many of the basic project objectives. Specific objectives only partially or not completely met by Alternative 2 are listed below.

- To construct a regional mall with supporting retail, office and commercial services along the Highway 99 corridor that will accommodate the existing and future demand for such services in the City.
- To construct a commercial complex of sufficient size and land use mix that maximizes synergy on-site between commercial, office, retail and high density residential opportunities in the City.
- To reduce overall vehicle miles traveled by City residents to access commercial opportunities in the region, and hence reduce vehicular air and noise emissions, by providing a retail environment unavailable within a radius of 10 miles.
- To create a high-quality commercial, office, retail and entertainment development which encourages a sense of place and social interaction in the City.

- To create a high-quality comprehensive and fully integrated commercial, office, retail and entertainment development on one site rather than development of less desirable fragmented land uses spread out over several other locations.
- To provide an expanded economic base for the City by generating substantial property and sales tax and fee revenue.
- To develop a regional marketplace to attract fashion department stores, specialty uses that are not currently represented in the City.
- To provide employment opportunities for City residents.
- To provide safe and convenient customer access by locating the project immediately adjacent to an existing regional interchange with Highway 99 and major roadways.
- To provide regional retail services not currently available to the City by the end of 2003.

Alternative 3 – Modified Use Mix Alternative B

Under Alternative 3, the 295-acre project site would be developed with a mix of urban land uses including a regional mall and similar multi-family residential uses. However, this alternative would reduce the size of the commercial development by approximately 50 percent and would introduce single-family residential uses to the site. A General Plan Amendment would still be required from Urban Development Area (UDA) to single family residential (SFR), medium density residential (MDR), and commercial and office (C&O), as would a zone change from Agriculture (AG-80) to RD-5, RD-20, SC and TC. In addition, Alternative 3 would also require an amendment to the General Plan Transportation Diagram to reflect interior project roadways as appropriate. As shown on **Figure 6.0-2**, the development footprint would remain similar to that of the proposed project. The following uses would be developed with selection of Alternative 3:

Land Use	Acres	Dwelling Units/ Square feet	Zoning	GP Designation
Single Family Residential (5 du/acre)	115	575 du	RD-5	SFR
Multi-Family Residential (20 du/acre)	20	400 du	RD-20	MDR
Regional Commercial	120	1,300,000 sf	SC	C & O
Commercial	27	235,224 sf	TC	C&O
Park	13	--	RD-5	OS
	295	975 du; 1,55,224 sf	--	--

Agricultural Resources

Both the project and this alternative would develop 285 acres of land for urban use and 8 acres for a detention basin that has been historically cultivated. Since the development footprint is similar between the two, both are considered to have an equal degree of impact to agricultural resources. Thus,

neither the proposed project nor Alternative 3 is considered environmentally superior with respect to agricultural resources.

Transportation and Circulation

Implementation of Alternative 3 would result in a decrease in project-generated traffic. Specifically, using ITE Trip Generation Manual factors, average daily trip generation on the project site would decrease from approximately 63,880 daily trips with the proposed project to approximately 32,464 daily trips (a 50 percent decrease). Peak hour a.m. trips would decrease from 1,380 to 1,304, and peak hour p.m. trips would decrease from 6,230 to 3,306. Because Alternative 3 would result in fewer traffic impacts on local roadways and would, therefore, require fewer roadway improvements off the project site than the project, Alternative 3 would be environmentally superior to the project with respect to traffic and circulation impacts. However, development of Alternative 3 would not result in the same reduction in vehicle miles traveled by City residents that would occur under the proposed project.

Air Quality

Because similar on-site grading would occur under Alternative 3, the total amount of grading and construction-related air quality impacts would be similar to those of the project. However, Alternative 3 proposes a different mix of land uses than that identified for the proposed project. The comparative effect of these development alternatives on air emissions is provided below.

Emissions Source	Emissions in Pounds per Day		
	NO _x	ROG	PM ₁₀
Proposed Project	258.04	363.08	209.82
Alternative 3	243.99	338.25	202.62
Recommended SMAQMD Thresholds	85.0	85.0	275

Source: Impact Sciences, Inc., July 2000.

As shown, Alternative 3 would generate less ROG, NO_x, and PM₁₀ air emissions on a daily basis than the proposed project. Therefore, Alternative 3 would be environmentally superior to the proposed project with respect to air quality.

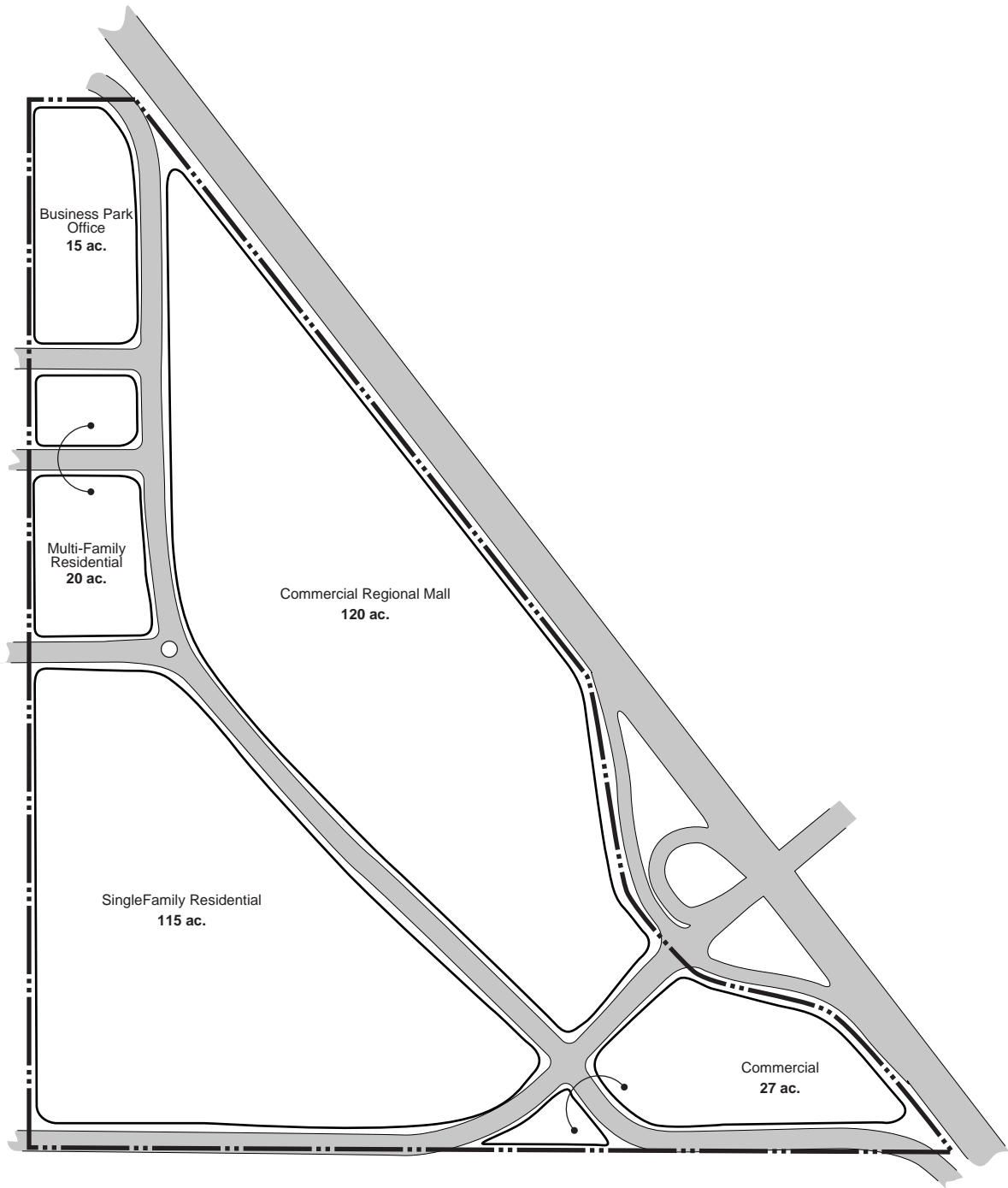


FIGURE 6.0-2

Alternative 3-Modified Mixed Use Alternative "B"

Noise

With a decrease in the number of vehicle trips introduced onto the local roadway network, there would be an associated decrease in project-generated noise impacts on and in the vicinity of the site. This is particularly the case in this instance, where delivery trucks traveling to and from the commercial uses on-site would be reduced in number and partially replaced by automobiles. Moreover, it is likely that point source noise would be reduced under Alternative 3, as loading and off-loading of goods and supplies for the commercial uses under the proposed project would be reduced in frequency and volume. Therefore, Alternative 3 would be environmentally superior to the project with respect to noise impacts.

Environmental Hazards

Given the similar overall development footprint between the proposed project and Alternative 3, and because development under this alternative would also place developed uses near potential off-site hazards when compared to the proposed project, impacts associated with environmental hazards are similar to those of the proposed project. Given the above, neither Alternative 3 nor the proposed project is considered environmentally superior with respect to environmental hazards.

Public Services and Utilities

a) Water Resources

The demand for water resources would be greater under Alternative 3 than for the proposed project due to the greater number of residential uses associated with this alternative. Water consumption for Alternative 3 would be 1,118 acre-feet per year compared to 1,026 acre-feet per year of water that the proposed project would require from potable water supplies. Off-site infrastructure improvements would be required under either development scenario. Because Alternative 3 would consume more water than the proposed project, it would not be environmentally superior to the project with respect to water resources.

b) Wastewater Disposal

Wastewater generation for Alternative 3 would be 0.9 mgd compared to 0.59 mgd under the project. As with the proposed project, this wastewater would be treated at the SRCSD regional water reclamation plant. Off-site infrastructure improvements would be required under either development scenario. Because more wastewater from the project site would go to the WRP, this alternative would have a greater impact on the treatment facility and conveyance facilities than would the proposed project and

is, therefore, not environmentally superior to the proposed project with respect to impacts on wastewater disposal.

c) Solid Waste Disposal

At buildout, the project would generate approximately 7,746 tons of solid waste per year. In comparison, Alternative 3 would generate 4,069 tons of solid waste annually. Given that less solid waste would be generated by uses developed under Alternative 3 compared to that of the proposed project, Alternative 3 would be environmentally superior to the project with respect to solid waste disposal impacts.

d) Fire Services

Site development under either the proposed project or Alternative 3 would increase the amount of human presence and the number of structures in the project vicinity. Consequently, increased calls for service would be expected with site development. The types of calls for service associated with Alternative 3 is likely to be similar to that of the proposed project, given that both contain a regional commercial and residential component. However, Alternative 3 would create a greater permanent population on-site than under the proposed project, since this alternative contains 975 dwellings versus the 280 units of the proposed project. With the proposed project, human presence is largely limited to day-time and evening hours (business hours), since that is when stores are open. In contrast, human presence would be more constant with construction of Alternative 3, since this alternative contains a larger residential component. In addition, large commercial structures such as those planned under the proposed project are required to have fire suppression systems such as sprinklers, whereas single family residential dwellings are not required to contain such systems. Thus, the chance for a catastrophic fire to occur on-site is reduced when compared to Alternative 3, which contains more residential uses than does the proposed project. For these reasons, it is likely that Alternative 3 would create a greater number of calls for service than would the proposed project. Because Alternative 3 would result in more dwelling units and a larger population on the project site than would occur under the project, there would be a greater number of Fire Department calls to the site with Alternative 3 than under the project. Consequently, the proposed project is considered superior to Alternative 3 with regard to impacts on fire protection service.

e) Police Protection/Crime Prevention

Site development under either the proposed project or Alternative 3 would increase the amount of human presence (through an increase in resident site population) and the number of structures in the project vicinity, thereby creating demands on the Police Department to respond to an increase in the number of calls to the site in either condition. Both the proposed project and Alternative 3 would

increase demands for police service on the site. Consequently, it cannot necessarily be said that the proposed project is considered superior to Alternative 3 with regard to impacts on Police protection service.

f) Schools

Alternative 3 would generate 675 students compared to the 194 students that would be generated by the project. All uses that would be constructed on-site are required to pay statutory school impact fees to mitigate impacts to schools. Compliance with the fee program will mitigate impacts to the affected district regardless of the type of development proposed. However, based on impact potential without consideration to mitigation payments, the proposed project is considered environmentally superior to Alternative 3 with respect to school impacts.

g) Parks, and Recreation

Under City requirements of 5.0 acres of parkland per 1,000 persons, development of the proposed project would require the applicant to provide 2.8 acres of local parkland and/or in-lieu fees. Per the same parkland requirements, development under Alternative 3 would require a total of 13 acres for parkland and/or in-lieu fees. As indicated in **Section 4.6.7, Parks and Recreation**, the applicant is required to pay an in-lieu fee to cover the cost generated by the increased demand for park and recreation facilities. While Alternative 3 would increase the demand for park facilities beyond that of the proposed project, the applicant would be required to pay an in-lieu fee to cover the demand for park and recreation facilities associated with Alternative 3. However, from an impact perspective, Alternative 3 creates a greater demand for parkland based on the standards identified by City requirements. Therefore, Alternative 3 is not considered to be environmentally superior with regard to demands placed upon park and recreation facilities.

Hydrology and Water Quality

Urban runoff generated under Alternative 3 would be conveyed and discharged off site through existing and proposed drainages and drainage basins. Because a similar development footprint and grading activity would occur on under Alternative 3 compared to the proposed project, there would be similar impacts to groundwater recharge. Off-site infrastructure improvements would be similar under either development scenario. Site development under either scenario would also reduce groundwater pumping associated with historic agricultural use on the property, which is a beneficial impact.

Section 4.7, Hydrology and Water Quality, indicates that site development would increase runoff flows over present conditions. However, because both the project and Alternative 3 would cover

approximately the same amount of surface area with impermeable material, the amount of runoff from the site would be similar under either development scenario. Therefore, neither the project nor Alternative 3 would be environmentally superior alternative with respect to runoff volume.

Under either development scenario, storm and irrigation runoff could contain substances, such as pesticides, herbicides, etc. However, stormwater runoff would be required to meet the same Regional Water Quality Control Board water quality standards regardless of the uses proposed on the site, so storm runoff under either the proposed project or Alternative 3 would not significantly impact surface waters. Therefore, neither Alternative 3 nor the project is environmentally superior to the other with respect to runoff water quality.

Biological Resources

Under Alternative 3, there would be similar grading activity (disturbance to 295 acres) to that of the proposed project. Thus, direct impacts to on-site biological resources would be similar under either development scenario. The residential character of site development under Alternative 3 is more problematic biologically, because people are generally more active outside of their homes and there is a greater opportunity for stray pets or children to interact with wildlife in adjacent and off-site open areas, thereby increasing the magnitude of indirect impacts. In contrast, the predominately commercial nature of the proposed project would result in a more transitory population that is busy working or shopping and is gone during the evening and at night. From a biological standpoint, Alternative 3 is not considered environmentally superior to the proposed project.

Geology and Geotechnical Hazards

Grading activity on-site would be similar to that of the proposed project, since the development footprint is the same and the same soil conditions will apply regardless of the uses proposed on the property. Furthermore, improvements constructed on the site under Alternative 3 would be subjected to the forces of ground movement (e.g., shaking buildings, etc) during seismic events similar to the proposed project, and would also be subject to the same construction requirements as the proposed project. Because site development under Alternative 3 would require similar grading and earth movement to that of the project, and would be subject to the same seismologic forces as the proposed project, Alternative 3 is not considered to be an environmentally superior alternative to the proposed project.

Cultural Resources

The project site has yielded no evidence of prehistoric or historic occupation based on archival records search. In addition, the site has been previously disturbed by agricultural cultivation, which makes it unlikely that the site contains any undisturbed cultural resources. Further, none of the existing structures on the site are considered historically significant. Consequently, site development under either the proposed project or this alternative would not create a significant cultural resource impact and neither is considered superior with respect to the other.

Visual Qualities

Implementation of either this alternative or the proposed project would result in the demolition and removal of the existing on-site structures and many of the trees presently found on-site. Following demolition, the site would be prepared through a combination of earth moving activities including excavation, grading, and compaction. These short-term impacts would occur under either development scenario.

In the long term, site development would result in the introduction of urban uses in a rural area that is undergoing urbanization. Uses on the site would be highly visible from SR-99, which contains a scenic corridor that extends onto the project site. As with the proposed project, commercial uses would be oriented towards the freeway in order to enhance visibility. Residential uses would be located within the site interior, and would be separated from the viewing audience by the commercial buildings. Consequently, visual impacts would be similar to that of the proposed project, since the uses most visible would have a similar mass, building materials, and architectural style to that of the proposed project. It is also likely that light and glare impacts would be similar, since the commercial uses are visible from adjacent roadways to a greater degree than the residential (residential structures typically are constructed of stucco, wood, or brick/stone siding as opposed to reflective materials such as glass typically associated with commercial buildings). Based on the above, Alternative 3 is not considered environmentally superior to the proposed project with respect to visual impacts.

Land Use

Land use compatibility impacts associated with the agricultural operations (i.e., pesticide use, trespassing, and vandalism) to the west and the introduction of residential land uses would be substantially increased under this alternative due to an increase in the interface. In addition, noise impacts due to the introduction of more residential land uses along a larger commercial interface would

result in greater noise impacts due to onsite commercial operation such as parking lot, loading docks, and mechanical equipment. Overall, this alternative would result in more land use compatibility impacts than the proposed project.

Conclusion

In conclusion, this alternative would result in greater environmental impacts in many of the environmental categories while failing to reduce any of the unavoidable significant project impacts. Further, this alternative does not fully attain many of the basic project objectives. Specific objectives only partially or not completely met by Alternative 3 are listed below.

- To create a high-quality comprehensive and fully integrated commercial, office, retail and entertainment development on one site rather than development of less desirable fragmented land uses spread out over several other locations.
- To promote development in an orderly and cohesive manner for the entire project site and prevent the piecemeal development of the site with a mix of incompatible uses which could otherwise result.

Alternative 4 – Reduced Density Alternative

Under Alternative 4, the 295-acre project site would still be developed with a regional mall and similar multi-family residential uses. However, this alternative would reduce the size of the commercial development by approximately 30 percent (i.e., down to 2,163,700 sf). Consequently, the development footprint would be smaller than that for the proposed project. However, a General Plan Amendment would still be required from Urban Development Area (UDA) to commercial and office (C&O) and medium density residential (HDR), as would a zone change from Agriculture (AG-80) to SC, GC, and RD-20. In addition, Alternative 4 would also require an amendment to the General Plan Transportation Diagram to reflect interior project roadways as appropriate. The following uses would be developed with selection of Alternative 4:

Land Use	Acres	Dwelling Units/ Square feet	Zoning	GP Designation
Regional Shopping Mall	74	910,000 sf	SC	C & O
Community/neighborhood Commercial	78.5	820,400 sf	SC	C & O
Office and Entertainment	21.4	222,600 sf	GC	C & O
Visitor Commercial	21.7	210,700	GC	C & O
Multi-Family Residential (20 du/acre)	15	280	RD-20	MDR
Agriculture	84.4	--	AG-80	UDA
	295	280 du; 2,163,700 sf	--	--

Agricultural Resources

While the project would develop 293 (includes 8 acres for detention basin) acres of agricultural land, Alternative 4 would retain some existing agricultural land, as the development footprint will be reduced by approximately 30 percent. Consequently, impacts to agricultural resources (namely the conversion of important farmlands) would be reduced under Alternative 4 than for the proposed project, and Alternative 4 is considered environmentally superior with respect to the conversion of Farmlands of Statewide Importance. However, it should be noted that with only 85 acres remaining for agricultural production, this amount of farmable land would likely be too small a piece of property to efficiently and economically farm.

Transportation and Circulation

Implementation of Alternative 4 would result in a decrease in project-generated traffic. Specifically, using ITE Trip Generation Manual factors, average daily trip generation on the project site would decrease from approximately 63,880 daily trips with the proposed project to approximately 45,087 daily trips (a 30 percent decrease). Peak hour a.m. trips would decrease from 1,380 to 1,009, and peak hour p.m. trips would decrease from 6,380 to 4,783. Because Alternative 4 would result in fewer traffic impacts on local roadways and would, therefore, require fewer roadway improvements off the project site than the project, Alternative 4 would be environmentally superior to the project with respect to traffic and circulation impacts. However, development of Alternative 4 would not result in the same reduction in vehicle miles traveled by City residents that would occur under the proposed project.

Air Quality

Because less on-site grading would occur under Alternative 4, the total amount of grading and construction-related air quality impacts would be less than those of the project (30 percent reduction). Alternative 4 also proposes less development intensity to that identified for the proposed project. The comparative effect of these development alternatives on air emissions is provided below.

Emissions Source	Emissions in Pounds per Day		
	NO _x	ROG	PM ₁₀
Proposed Project	258.04	363.08	209.82
Alternative 4	180.6	254.2	146.8
Recommended SMAQMD Thresholds	85.0	85.0	275

Source: Impact Sciences, Inc., July 2000.

As shown, Alternative 4 would generate fewer ROG, NO_x, and PM₁₀ air emissions on a daily basis than the proposed project. Therefore, Alternative 4 would be environmentally superior to the proposed project with respect to air quality. However, it should be noted that the significant air quality impacts created by the proposed project would still be significant under Alternative 4 (significance thresholds for air quality would still be exceeded). Moreover, agricultural activity may still occur on the 30 acres of farmland preserved under this alternative. Consequently, an additional amount of fugitive dust would be created during operation of Alternative 4.

Noise

With a decrease in the number of vehicle trips introduced onto the local roadway network, there would be an associated decrease in project-generated noise impacts on and in the vicinity of the site. This is particularly the case in this instance, where delivery trucks traveling to and from the commercial uses on-site would be reduced in number. Moreover, it is likely that point source noise would be reduced under this alternative, as loading and off-loading of goods and supplies for the commercial uses under the proposed project would be reduced in frequency and volume. Therefore, Alternative 4 would be environmentally superior to the project with respect to noise impacts.

Environmental Hazards

Given the similar overall development footprint between the proposed project and Alternative 3, and because development under this alternative would also place developed uses near potential off-site hazards when compared to the proposed project, impacts associated with environmental hazards are similar to those of the proposed project. Given the above, neither Alternative 4 nor the proposed project is considered environmentally superior with respect to environmental hazards.

Public Services and Utilities

a) Water Resources

The demand for water resources would be less under Alternative 4 than for the proposed project due to the reduced development intensity associated with this alternative. Water consumption for Alternative 4 would be 718 acre-feet per year compared to 1,026 acre-feet per year of water that the proposed project would require from potable water supplies. Off-site infrastructure improvements would be required under either scenario. Because Alternative 4 would consume less water than the proposed project, it would be environmentally superior to the project with respect to water resources.

b) Wastewater Disposal

Wastewater generation for Alternative 4 would be 0.41 mgd compared to 0.59 mgd under the project. As with the proposed project, this wastewater would be treated at the SRCSD regional water reclamation plant. Off-site infrastructure improvements would also be required under either scenario. Because less wastewater from the project site would go to the WRP, Alternative 4 would have a smaller impact on the treatment facility and conveyance facilities than would the proposed project. Alternative 4 is, therefore, environmentally superior to the proposed project with respect to impacts on wastewater disposal.

c) Solid Waste Disposal

At buildout, the project would generate approximately 7,746 tons of solid waste per year. In comparison, Alternative 4 would generate 5,422 tons of solid waste annually. Given that less solid waste would be generated by uses developed under Alternative 4 compared to that of the proposed project, Alternative 4 would be environmentally superior to the project with respect to solid waste disposal impacts.

d) Fire Services

Site development under either the proposed project or Alternative 4 would increase the amount of human presence and the number of structures in the project vicinity. However, because Alternative 4 would result in a smaller transient population on the commercial portions of the project site than the proposed project, there would be a smaller number of Fire Department calls to the site. Consequently, Alternative 4 is considered environmentally superior with regard to impacts on fire protection service.

e) Police Protection/Crime Prevention

Site development under either the proposed project or Alternative 4 would increase the amount of human presence and the number of structures in the project vicinity. Because Alternative 4 would result in a smaller transient population on the commercial portions of the project site than the proposed project, there would be a smaller number of Police Department calls to the site. Consequently, Alternative 4 is considered environmentally superior with regard to impacts on Police protection service.

f) Schools

Alternative 4 would generate 194 students, as would the proposed project. All uses that would be constructed on-site are required to pay statutory school impact fees to mitigate impacts to schools. Compliance with the fee program will mitigate impacts to the affected district regardless of the type

of development proposed. Consequently, neither the proposed project nor Alternative 4 is considered superior with regard to impacts on school facilities.

g) Parks, and Recreation

Under City requirements of 5.0 acres of parkland per 1,000 persons, development of the proposed project would require the applicant to provide 2.8 acres of local parkland. Per the same parkland requirements, development under Alternative 4 would also require 2.8 acres for parkland and/or in-lieu fees. As indicated in **Section 4.6.7, Parks and Recreation**, the applicant is required to pay an in-lieu fee to cover the cost generated by the increased demand for park and recreation facilities or dedicate land. Therefore, neither the project nor Alternative 4 is considered to be environmentally superior with regard to demands placed upon park and recreation facilities.

Hydrology and Water Quality

Urban runoff generated under Alternative 4 would be conveyed and discharged off site through existing and proposed drainages and drainage basins. Because a smaller development footprint and less grading activity would occur under Alternative 4 compared to the proposed project, there would be less of an impact to groundwater recharge. Site development under either scenario would also reduce groundwater pumping associated with historic agricultural use on the property, which is a beneficial impact.

Section 4.7, Hydrology and Water Quality, indicates that site development would increase runoff flows over present conditions. However, because Alternative 4 would cover less surface area with impermeable material, the amount of runoff from the site would be less under the Alternative 4 development scenario. Therefore, Alternative 4 would be environmentally superior to the proposed project with respect to runoff volume.

Under either development scenario, storm and irrigation runoff could contain substances, such as pesticides, herbicides, etc. However, stormwater runoff would be required to meet the same Regional Water Quality Control Board water quality standards regardless of the uses proposed on the site, so storm runoff under either the proposed project or Alternative 4 would not significantly impact surface waters. Therefore, neither Alternative 4 nor the project is environmentally superior to the other with respect to runoff water quality.

Biological Resources

Under Alternative 4, there would be less grading activity when compared to that of the proposed project (i.e., Alternative 4 has a smaller development footprint). Thus, direct impacts to on-site biological resources would be less under the Alternative 4 development scenario. While, both the project and Alternative 4 would result in an increase in permanent human population on the project site, development under Alternative 4 could provide a greater separation between developed uses constructed on-site and adjacent habitat. Consequently, Alternative 4 offers the potential for reduced direct impacts to biologic resources. For example, under Alternative 4, it may be possible to preserve some on-site habitat for Swainson's hawk. In addition, it might be possible to avoid the removal of the elderberry shrub bushes, thereby retaining potential habitat for the valley elderberry longhorn beetle. It should be noted, however, that any preserved habitat would likely be left in a fragmented condition, and remaining habitat would be immediately adjacent to urban development and the indirect impacts thereby created. Consequently, the remaining habitat would be of low value compared with the preservation of larger, off-site habitat areas that would occur under project mitigation. Nevertheless, based on the above information, Alternative 4 is considered environmentally superior to the proposed project with respect to direct biological impacts.

Geology and Geotechnical Hazards

Grading activity on-site would be less than that of the proposed project, since the development footprint is the reduced. Improvements constructed on the site under Alternative 4 would be subjected to the forces of ground movement (e.g., shaking buildings, etc) during seismic events similar to the proposed project, and would also be subject to the same construction requirements as the proposed project. Because site development under Alternative 4 would require less grading and earth movement to that of the project, impacts associated with earthwork would be less than those of the proposed project. However, since both the proposed project and Alternative 4 would be subject to the same seismologic forces, Alternative 4 is not considered to be an environmentally superior alternative to the proposed project.

Cultural Resources

The project site has yielded no evidence of prehistoric or historic occupation based on archival records search. In addition, the site has been previously disturbed by agricultural cultivation, which makes it unlikely that the site contains any undisturbed cultural resources. Further, none of the existing structures on the site are considered historically significant. Consequently, site development under

either the proposed project or Alternative 4 would not create a significant cultural resource impact and neither is considered superior with respect to the other.

Visual Qualities

Implementation of either Alternative 4 or the proposed project would result in the demolition and removal of the existing on-site structures and many of the trees presently found on-site. Following demolition, the site would be prepared through a combination of earth moving activities including excavation, grading, and compaction. These short-term impacts would occur under either development scenario.

In the long term, site development would result in the introduction of urban uses in a rural area that is undergoing urbanization. Uses on the site would be highly visible from SR-99, which contains a scenic corridor that extends onto the project site. As with the proposed project, commercial uses would likely be oriented towards the freeway in order to enhance visibility. Residential uses would likely be located within the site interior, and would be separated from the viewing audience by the commercial buildings. Consequently, visual impacts would be similar to that of the proposed project, since the uses most visible would have a similar mass, building materials, and architectural style to that of the proposed project, although with a reduced development footprint. It is also likely that light and glare impacts would be similar, since the commercial uses under either the proposed project or Alternative 4 would be visible from adjacent roadways to a greater degree than the residential uses (residential structures typically are constructed of stucco, wood, or brick/stone siding as opposed to reflective materials such as glass typically associated with commercial buildings). Based on the above, Alternative 4 is not considered environmentally superior to the proposed project with respect to visual impacts.

Land Use

This alternative would include onsite agriculture land which could result in more problems associated with the interface between development and onsite agriculture uses. Nonetheless, this alternative would result in less noise due to less onsite point sources, and less air quality impact due to the generation of less vehicle trips. Overall, this alternative would result in less compatibility impacts than the proposed project.

Conclusion

In conclusion, this alternative would reduce many of the environmental impacts associated with the proposed project. However, this alternative does not fully attain many of the basic project objectives. Specific objectives not completely or only partially met by Alternative 4 are listed below.

- To create a high-quality comprehensive and fully integrated commercial, office, retail and entertainment development on one site rather than development of less desirable fragmented land uses spread out over several other locations.
- To promote development in an orderly and cohesive manner for the entire project site and prevent the piecemeal development of the site with a mix of incompatible uses which could otherwise result.

Alternative 5 – Off-Site Alternative – Poppy Ridge

The Lent Ranch Marketplace is proposed to meet an existing and future demand for regional and local commercial uses created by the current and projected increase in population within the City of Elk Grove. While it is conceivable that individual alternative sites to the project could be found and developed to meet this demand, it is just as conceivable that this demand could be met by developing many small parcels at key locations which are spread out along the State Route 99 corridor. Consequently, there could be many land parcels that could be developed in replacement of the project site.

The CEQA *Guidelines* state that the range of alternatives evaluated in an EIR is subject to the “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives should focus on those that avoid or substantially lessen any of the significant effects of the project. With regard to alternative locations, the key question and first step in the analysis is to determine whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

In the case of the proposed project, the majority of the significant environmental impacts associated with the project are attributable to the intensity of the development. For instance, both traffic and air quality impacts are related to the number of vehicle trips generated by the project. Local traffic circulation impacts can be influenced by the location of the project. With an alternative site, traffic impacts could be worse than under the proposed project if the roadways and intersections accommodating the alternative’s traffic are already constrained or more constrained in the future cumulative condition than the roadways and intersections serving the proposed project. However, some

of the biological impacts identified with the proposed project could be considered site specific. For example, site development would remove habitat for Swainson's hawk, a Federal and State Species of Concern. It is possible that an alternative site exists that, if developed instead of the proposed project site, would not impact Swainson's hawk habitat, while at the same time creating impacts to other sensitive species.

One alternative provided during the Notice of Preparation period that was initially considered by the City involved separating the proposed regional mall, commercial uses, office and entertainment uses, and residential development. These uses would be developed on approximately 167 acres of vacant commercial parcels located throughout the Laguna area. It should be noted that no specific alternative site locations were identified within the NOP response provided to the City. In addition to the scattered locations alternative, three locations along or near State Route 99, which would be generally suitable as an alternative site and serve the south area, were identified and considered. These sites were previously identified by the County as alternative locations to the project. These sites include:

- South of Elk Grove Boulevard on either side of Bruceville Road.
- Property adjacent to and surrounding the Elk Grove Auto Mall at the intersection of State Route 99 and Elk Grove Boulevard.
- Intersection of Poppy Ridge Road and West Stockton Boulevard/State Route 99

All of the sites considered are currently designated for urban use by the City's General Plan, but some of the alternative sites may require rezoning to allow commercial uses. In addition, these sites are part of or located in proximity to the Laguna Ridge and East Franklin Specific Plan areas. Sites outside of the City's boundary were not considered as they are not subject to the City's land use jurisdiction and would not meet basic project objectives.

In evaluating the viability of each of the alternatives, consideration was given to the size of the property, present general plan and zoning designations, direct freeway access, proximity to the State Route 99 freeway corridor for visibility, the ability to reduce environmental impacts associated with the project, and the ability to meet most of the basic project objectives. Other factors considered as allowed by CEQA included site suitability, economic viability, availability of infrastructure, jurisdictional boundaries, and whether the applicant could reasonably acquire, control or otherwise have access to alternative sites.

Development of the project on 167 acres of vacant properties scattered throughout the Laguna area is not considered to be a feasible alternative by the City for a number of reasons. First, the vacant 167 acres

located in the Laguna area would not satisfy the acreage needs of the proposed project, which requires approximately 280 contiguous acres. Second, by scattering the project throughout the Laguna area, it is conceivable these smaller commercial centers would not attract fashion department stores and specialty retail use that would be available within the regional mall setting. It is more likely that the smaller commercial centers would attract community commercial type uses such as grocery store, movie rentals, and hairstyling shops. Persons residing within the City of Elk Grove and market area would continue to travel outside the area to purchase goods and services not provided by a regional mall setting. The development of the scattered commercial centers and need to travel outside the area for goods and services not provided with the area would increase the vehicle trips and miles traveled within the region. At a minimum, this alternative would result in increase traffic and circulation, air quality, and noise impacts within the region. Third, this alternative would not fulfill a number of the project objectives including:

- To construct a regional mall with supporting retail, office and commercial services along the Highway 99 corridor that will accommodate the existing and future demand for such services in the City.
- To construct a commercial complex of sufficient size and land use mix that maximizes synergy on-site between commercial, office, retail and high density residential opportunities in the City.
- To reduce overall vehicle miles traveled by City residents to access commercial opportunities in the region, and hence reduce vehicular air and noise emissions, by providing a retail environment unavailable within a radius of 10 miles.
- To create a high-quality commercial, office, retail and entertainment development which encourages a sense of place and social interaction in the City.
- To create a high-quality comprehensive and fully integrated commercial, office, retail and entertainment development on one site rather than development of less desirable fragmented land uses spread out over several other locations.
- To provide a pleasing urban landscape that will enhance the aesthetic and visual quality of the area, on a site that is designated in the General Plan for Urban Development.
- To promote development in an orderly and cohesive manner for the entire project site and prevent the piecemeal development of the site with a mix of incompatible uses which could otherwise result.
- To develop a regional marketplace to attract fashion department stores, specialty uses that are not currently represented in the City.
- To provide safe and convenient customer access by locating the project immediately adjacent to an existing regional interchange with Highway 99 and major roadways.
- To provide regional retail services not currently available to the City by the end of 2003.

As indicated in CEQA 15126.6 (c), “among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.” As discussed above, the development of the project on scattered sites would not meet most of the basic objectives of the project, would not be feasible as it is not a contiguous site, and at a minimum would not avoid or substantially lessen the significant effects of the project associated with traffic and circulation, air quality, or noise. As such, this alternative has been eliminated from detailed consideration within this EIR.

The site near Elk Grove Boulevard was eliminated from further consideration within this EIR as it is not considered suitable for a regional mall. This is based on poor direct access to the freeway, and due to the distance to State Route 99, which would provide poor visibility for a regional mall.

The site near the Elk Grove Auto Mall would provide adequate visibility, but suffers from inadequate freeway access. Although freeway access would be provided to the site by State Route 99 via Elk Grove Boulevard, the Elk Grove Boulevard interchange on State Route 99 is already projected to be severely congested under buildout conditions and no further interchange improvements are feasible or planned. The addition of regional mall traffic to this interchange would further hamper the ability of this interchange to function under acceptable conditions and as such was eliminated from further consideration within this EIR.

The site located at the intersection of West Stockton Boulevard with Poppy Ridge Road was determined to be the most viable alternative location for a regional mall (**Figure 6.0-3**). This site is considered suitable as it has good freeway visibility and is also within the City of Elk Grove. Furthermore, a new freeway interchange is being considered at this location, so the property would, like the proposed project, have reasonably good regional access. However, a General Plan Amendment would still be required from Urban Development Area (UDA) to commercial and office (C&O) and medium density residential (MDR), as would a zone change from Agriculture (AG-80) to SC, GC, and RD-20. In addition, this alternative identified as Alternative 5 would also require an amendment to the General Plan Transportation Diagram to reflect interior project roadways as appropriate.

Impact Analysis

Agricultural Resources

Both the project and this alternative would develop 285 acres of land that has been historically cultivated, and possibly another 8 acres for a detention basin. Since the development footprint would

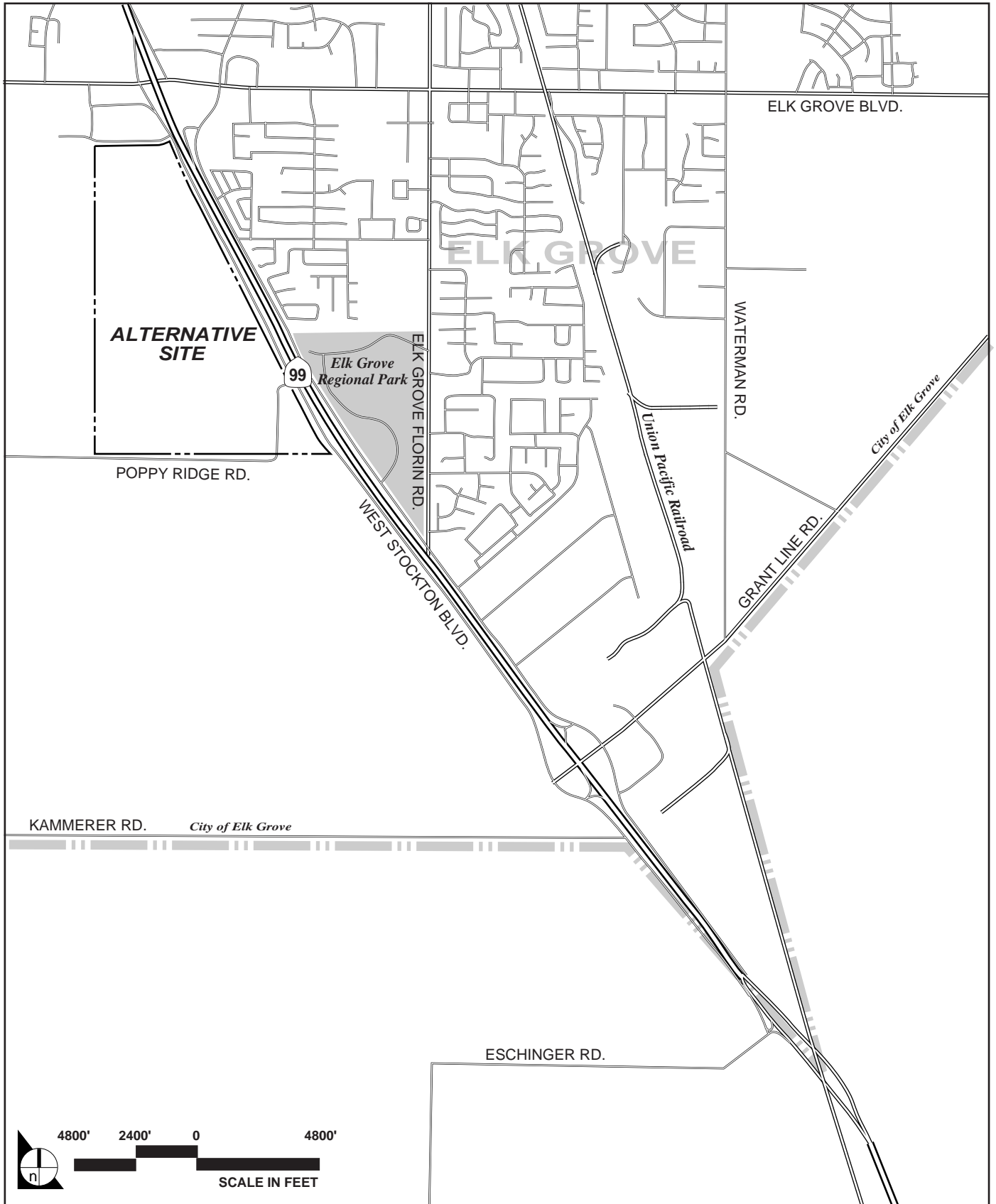


FIGURE 6.0-3

Alternative Site Location

be similar between the two, both are considered to have an equal degree of impact to agricultural resources. Thus, neither the proposed project nor Alternative 5 is considered environmentally superior with respect to agricultural resources.

Transportation and Circulation

Implementation of Alternative 5 would result in the same volume of vehicle traffic on a daily basis (64,410 ADT). Peak hour a.m. trips would also remain the same. This alternative would also place development closer to existing transit lines. However, traffic impacts would be of greater magnitude than under the proposed project because this alternative would place commercial uses near Elk Grove Boulevard and its interchange with SR-99. This roadway and associated ramps are identified as deficient in their ability to carry projected daily traffic volumes.¹ Development of proposed commercial uses at this alternative site would place project generated trips (including buses) onto roadways that operate poorly when compared to the roadway facilities near the proposed project site (i.e., Kammerer Road, West Stockton Boulevard, and the portion of SR-99 near the Grant Line Road interchange). Consequently, Alternative 5 is not considered superior to the proposed project from a transportation perspective.

Air Quality

Because similar on-site grading would occur under Alternative 5, the total amount of grading and construction-related air quality impacts would be similar to those of the project. On an operational basis, a similar volume of air emissions would be generated as the proposed project, but the health effect of said emissions could be magnified by placing additional vehicle trips on heavily traveled roadways such as Elk Grove Boulevard. Traffic congested roadways and intersections have the potential for the generation of localized high levels of Carbon Monoxide within approximately 1,000 feet of a roadway. Therefore, Alternative 5 would not be environmentally superior to the proposed project with respect to air quality.

Noise

Increased mobile source noise on local roadways would be comparable between Alternative 5 and the proposed project, since the total volume of traffic generated at project buildout is equivalent. As with the proposed project, point source noise generated by loading docks, roof mounted mechanical devices, and general parking lot noise could create impacts to sensitive residential uses located in the nearby

¹ Fehr & Peers Associates, *Traffic Impact Study for Laguna Ridge Specific Plan*, November 5, 1999.

Laguna Ridge Specific Plan. Based on the above, neither the proposed project nor this alternative is considered superior with respect to noise.

Environmental Hazards

As with the project site, this alternative location is in proximity to the Suburban Propane and Georgia Pacific facilities, so the potential exists for a health risk created by the accidental release of propane or formaline at the respective facilities. According to **Figure 4.5-3** through **Figure 4.5-5** of the Draft EIR, both the proposed location and this alternative site are outside of the Overpressure vulnerability and Dispersion Vulnerability Zones for events at these industrial facilities. Finally both the project site and this alternative site are located within the same individual risk contour (10^{-8}). Consequently, neither the proposed project nor this alternative is considered superior with respect to environmental hazards.

Public Services and Utilities

a) Water Resources

The demand for water resources would be the same under Alternative 5 as the proposed project, since the same land use mix and amount of floor space would be developed. Both the current project site and this alternative site are located within the service boundaries of the Zone 40/41 system, so water supply would be available to serve the proposed uses regardless of the site selected. Similarly, both projects would pay connection fees and must construct all infrastructure (including any needed off-site facilities) consistent with the Zone 40 Water Master Plan. Based on the above, neither the proposed project nor this alternative is considered superior with regard to water resources.

b) Wastewater Disposal

The demand for wastewater treatment and disposal would be the same under Alternative 5 as the proposed project, since the same land use mix and amount of floor space would be developed. Both the current project site and this alternative site are located within the service boundaries of the Sacramento County Regional Sanitation District and both would pay connection fees and construct all infrastructure consistent with the Sewer Water Master Plan. Based on the above, neither the proposed project nor this alternative is considered superior with regard to water resources.

c) Solid Waste Disposal

The demand for solid waste disposal would be the same under Alternative 5 as the proposed project, since the same land use mix and amount of floor space would be developed. Solid waste generated at

both the current project site and this alternative site would likely be disposed at the Kiefer Road Landfill, which has a remaining lifespan of 30 to 40 years. Based on the above, neither the proposed project nor this alternative is considered superior with regard to solid waste disposal.

d) Fire Services

Site development under either the proposed project or Alternative 5 would increase the amount of human presence and the number of structures in the project vicinity. Because Alternative 5 would result in the same land use mix and amount of floor space as the proposed project, the number of Fire Department calls to the project with Alternative 5 would be the same as that for the proposed project. Based on the above, neither the proposed project nor this alternative is considered superior with regard to fire service.

e) Police Protection/Crime Prevention

Site development under either the proposed project or Alternative 5 would increase the amount of human presence and the number of structures in the project vicinity. Because Alternative 5 would result in the same land use mix and amount of floor space as the proposed project, the number of Sheriff Department calls to the project with Alternative 5 would be the same as that for the proposed project. Based on the above, neither the proposed project nor this alternative is considered superior with regard to law enforcement service.

f) Schools

Both Alternative 5 and the proposed project would generate 194 students. Regardless of the project location, all uses are required to pay statutory school impact fees to mitigate impacts to schools. Compliance with the fee program will mitigate impacts to the affected district, and neither the proposed project nor Alternative 5 is considered superior with respect to school impacts.

g) Parks, and Recreation

Under City requirements of 5.0 acres of parkland per 1,000 persons, development of the proposed project would require the applicant to provide 2.8 acres of local parkland and/or in-lieu fees as would Alternative 5. As indicated in **Section 4.6.7, Parks and Recreation**, the applicant is required to pay an in-lieu fee to cover the cost generated by the increased demand for park and recreation facilities. Since both the proposed project and Alternative 5 would create similar demand for park space that would be met by the payment of fees and/or land dedication, neither is considered superior with respect to park and recreation.

Hydrology and Water Quality

Urban runoff generated under Alternative 5 would be conveyed and discharged off site through existing and proposed drainages and drainage basins. Since the development footprints would be the same regardless of the project location, the level of impact to groundwater recharge would remain similar. Furthermore, site development at either location would reduce groundwater pumping associated with historic agricultural use, which is a beneficial water supply impact.

As with the proposed project, stormwater runoff would be collected by curb and gutter where it will be conveyed through a series of curb inlets and ultimately detained in a basin to reduce peak flows to pre-project levels. Consequently, no hydrology impacts would occur under either development scenario.

Under either development scenario, storm and irrigation runoff could contain substances, such as pesticides, herbicides, etc. However, stormwater runoff would be required to meet the same Regional Water Quality Control Board water quality standards regardless of the uses proposed on the site, so storm runoff under either Alternative 5 or the proposed project would not significantly impact surface waters. Therefore, neither Alternative 5 nor the project is environmentally superior to the other with respect to runoff water quality.

Biological Resources

As with the project site, the alternative site is disturbed as a result of present and historic agricultural activities. Plant communities located on the alternative site vary seasonally dependent upon whether the site is under cultivation or is lying fallow. Similar to the project site, this alternative site also contains agricultural drainage ditches that can maintain emergent riparian plants. Given the close proximity to the project site and similar character of the land, common wildlife found or expected to occur on the property is also expected to be similar to that of the proposed project. Finally, this site, as with the project site, is within the known range of the Valley elderberry longhorn beetle and Swainson's Hawk, which are considered special-status animal species. Given the above, neither the proposed project nor this alternative is considered superior with respect to biological resources.

Geology and Geotechnical Hazards

Grading activity on-site would be similar to that of the proposed project, since the development footprint is the same and soil conditions are expected to be similar between this property and the project site. Furthermore, improvements constructed on the site under Alternative 5 would be subjected

to the forces of ground movement (e.g., shaking buildings, etc) during seismic events similar to the proposed project, and would also be subject to the same construction requirements as the proposed project. Because site development under this alternative would require similar grading and earth movement to that of the project, and would be subject to the same seismologic forces as the proposed project, Alternative 5 is not considered to be an environmentally superior alternative to the proposed project.

Cultural Resources

Both the project site and this alternative site have been previously disturbed by agricultural cultivation, which makes it unlikely that either site contains undisturbed cultural resources. Consequently, site development under either the proposed project or Alternative 5 would not create a significant cultural resource impact and neither is considered superior with respect to the other.

Visual Qualities

Implementation of either this alternative or the proposed project would result in earth moving activities including excavation, grading, and compaction. These short-term impacts would occur under either development scenario.

In the long term, site development would result in the introduction of urban uses in a rural area that is undergoing urbanization. Uses on the site would be highly visible from SR-99, which contains a scenic corridor that extends onto the project site. With selection of this alternative site, the size, scale, and massing of on-site structures would be identical to that of the proposed project. Light and glare impacts are also identical, since the same building materials will be used. Based on the above, Alternative 5 is not considered to be an environmentally superior alternative to the proposed project.

Land Use

Both the project site and this alternative site are located in areas presently dominated by agricultural activity. The construction of commercial and residential uses at either location could present land use compatibility impacts associated the interface of urban and agricultural operations (i.e., pesticide use, trespassing, and vandalism). Hazard impacts under this alternative would also be similar to the proposed project since both the project site and this alternative location are in the same risk zone. Overall, this alternative would result in similar land use compatibility impacts to the proposed project.

While both the project site and this alternative are within the Urban Development Area defined by the General Plan, this off-site alternative would be more consistent with General Plan policy related to a compact urban form. This is based on the fact that this alternative site is located adjacent to the approved East Franklin Specific Plan whereas the proposed site is further south near the boundary of the UDA. The alternative site is also located closer to existing transit routes than the proposed project, so the project would be more consistent with policies relating to use of public transportation.

In conclusion, development on an alternative site will not avoid or minimize project impacts identified in **Section 4.0** of this Draft EIR when compared with the proposed project. Impacts would merely be relocated to a different site. While the basic project objectives would be attained with selection of an alternative site, none of the significant environmental impacts of the project would be mitigated by selection of this off-site alternative. Consequently, the off-site alternative is not considered environmentally superior to the proposed project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6.0-2 on the following page provides a comparison of each of the project alternatives on an environmental topic by topic basis. Based on the foregoing analysis, Alternative 1 (No Project) is considered the environmentally superior alternative. Section 15326(d)(2) of the CEQA Guidelines indicates that, if the No Project Alternative is the “environmentally superior” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this instance, Alternative 4 (Reduced Density) is considered environmentally superior to the proposed project.

**Table 6.0-2
Alternative Impact Comparison Matrix
ON-SITE ALTERNATIVES**

ENVIRONMENTAL TOPIC	ALTERNATIVE 1(a)	ALTERNATIVE 1(b)	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4 *	ALTERNATIVE 5
AGRICULTURAL RESOURCES	○	○	◐	◐	○	◐
TRANSPORTATION AND CIRCULATION	○	○	○	○	○	●
AIR QUALITY	○	○	○	○	○	●
NOISE	○	○	○	○	○	◐
ENVIRONMENTAL HAZARDS	○	○	◐	◐	◐	◐
WATER RESOURCES	●	●	●	●	○	◐
WASTEWATER DISPOSAL	○	○	●	●	○	◐
SOLID WASTE DISPOSAL	○	○	○	○	○	◐
FIRE SERVICES	○	○	●	●	○	◐
POLICE PROTECTION/CRIME PREVENTION	○	○	◐	◐	○	◐
SCHOOLS	○	○	●	●	◐	◐
PARKS AND RECREATION	○	○	●	●	◐	◐
HYDROLOGY (H) AND WATER QUALITY (WQ)	○ H ● WQ	○ H ● WQ	○ H ● WQ	◐ H ● WQ	○ H ● WQ	○ H ● WQ
BIOLOGICAL RESOURCES	○	○	●	●	○	◐
GEOLOGY AND GEOTECHNICAL HAZARDS	○	○	◐	◐	◐	◐
CULTURAL RESOURCES	○	○	◐	◐	◐	◐
VISUAL QUALITIES	○	○	○	◐	◐	◐
LAND USE	○	○	●	●	○	○

- ALTERNATIVE 1(a)**
No Development Alternative
- ALTERNATIVE 1(b)**
Planning and Zoning Code Alternative
- ALTERNATIVE 2**
Modified Mixed Use Alternative "A"
- ALTERNATIVE 3**
Modified Mixed Use Alternative "B"
- * ALTERNATIVE 4**
Reduced Density Alternative
- ALTERNATIVE 5**
Off-site Alternative

KEY (Level of Impact in Comparison to Project Site)

- Alternative Produces Greater Level of Impact
- ◐ Alternative Produces Equal Level of Impact
- Alternative Produces Lesser Level of Impact
- * Environmentally Superior Alternative