

5 ALTERNATIVES

CEQA Guidelines §15126.6 (a) specifies that the range of reasonable alternatives to be included in an EIR must consist of alternatives that “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.” The project objectives are stated in Chapter 3.0 of this EIR. Alternatives are used to determine whether or not a variation of a proposed project would reduce, or eliminate, significant project-induced impacts, within the basic framework of the objectives. CEQA Guidelines §15126.6 (f) specifies that the range of alternatives is governed by the “rule of reason,” requiring the evaluation of only those alternatives “... necessary to permit a reasoned choice.” Further, an EIR “... need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”

Potential environmental impacts for alternatives are provided as a comparison to the proposed project, adoption and implementation of the 65th Street Redevelopment Plan. The advantages and disadvantages of the alternatives to the proposed project are presented. This chapter also identifies the environmentally superior alternative based on the impact analysis in accordance with §15126.6(e)(2) of the Guidelines. If the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Any significant environmental impacts caused exclusively by an alternative are identified.

5.1 ALTERNATIVES PREVIOUSLY CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

Three alternatives were previously considered and rejected from further consideration, as summarized below:

- **Alternative Location.** CEQA requires that an alternative location for a proposed project be analyzed if one is available that could lessen potential adverse impacts associated with the proposed project. The objective of the Redevelopment Plan is to alleviate blight and encourage economic recovery in the 65th Street Project Area. Because of the nature of the Redevelopment Plan, which is to alleviate blight in this specific Project Area and remove barriers to development and encourage economic recovery, there are no other locations that could accommodate the project objectives. Implementation of an offsite alternative to the proposed project was deemed not feasible, and no off-site alternative has been considered or evaluated in this EIR.
- **Alternative Public Actions.** During preparation of the Redevelopment Plan, alternative strategies for redevelopment of the Project Area were considered. Based on field surveys and capital improvement plans for the City, Agency staff evaluated alternative public improvements and facilities to be included in the Redevelopment Plan. It was determined that the list of proposed public improvements and facilities represented the best mix of actions to assist in the redevelopment of the Project Area, because they have been identified by the City’s facility master plans and capital improvement/transportation plans as the actions needed to accommodate General Plan buildout and meet City goals and policies in the Project Area. Identifying alternative public actions would not have reduced any of the significant effects of the

Redevelopment Plan. It is for these reasons that this EIR does not consider an alternative list of public improvements and facilities.

- **Alternative Project Area Boundaries.** The Project Area boundaries were defined according to redevelopment law, based on definition of blight and urbanization, and through extensive public consultation to determine what Project Area boundaries would best meet the City's goals and objectives for redevelopment of this part of the City. There are no sensitive environmental issues in the Project Area that could be protected by excluding any particular area from the Project Area, thus no environmental impacts would be reduced by modifying the Project Area boundaries. It is for these reasons that this EIR does not consider alternative project area boundaries.

5.2 ALTERNATIVES TO THE PROPOSED ACTION

5.2.1 NO REDEVELOPMENT PROJECT ALTERNATIVE

Under the No-Project Alternative, the 65th Street Redevelopment Plan would not be adopted. The proposed public improvements that would be assisted with the Plan and other Redevelopment Plan programs (such as infrastructure improvements, commercial/industrial rehabilitation and low- and moderate-income housing assistance) would not be implemented with redevelopment funding. The "No Redevelopment Project" alternative considers what physical changes would be expected to occur in the Project Area if the proposed Redevelopment Plan was not approved, and development of the Project Area would occur as currently defined in the Sacramento General Plan and 65th Street / University Transit Village Plan ("Transit Village Plan") at a pace commensurate with prevailing market conditions and infrastructure improvements that the City could implement without redevelopment funding.

The specific goals of the Redevelopment Agency are to implement the City's adopted General Plan and specific plans by funding improvements around transit stations, developing vacant properties, redeveloping underutilized properties, and rehabilitating existing uses, thereby improving property values. Because the City's goals have not been accomplished by the private sector, redevelopment is being proposed for this area. Without Redevelopment Agency action and funding for revitalization, development in the Project Area would be expected to occur at a slower rate than would be the case with the adoption of the Redevelopment Plan. Blighting conditions, including inadequate public infrastructure, long-standing vacant parcels, dilapidated structures, small and shallow commercial lots, incompatible uses, abandoned buildings, soil and groundwater contamination and deteriorating housing stock would remain in the area. Because of these blighting conditions, much of the Project Area could be expected to continue declining, with physical deterioration, vacancies, and abandonment of properties increasing.

Under the No Project alternative, Redevelopment Agency powers to assemble suitable sites for development and provide assistance would not be available, thus integrated modern projects with greater community benefits would be less likely to be implemented. The amount of development could be substantially smaller and consist of less varied uses reflective solely of the market demand at a given time. The No-Project scenario would be similar to any aged and blighted urban area, where the Project Area would stay a marginal area with inadequate infrastructure, low lease rates and a deteriorating housing stock despite the underlying zoning. Quality of development would be poor,

blight would persist, and the housing stock would continue to deteriorate. Economic activity along the Folsom Boulevard corridor would remain depressed, with increased building vacancies. The objectives of the Transit Village Plan would be more difficult to meet without the Redevelopment Agency's assistance in consolidating parcels and contribution to improving public roads, intersections, water, sewer and drainage facilities to support new development.

Environmental Effects: Because general land use types, densities, and intensities that could be developed pursuant to the Redevelopment Plan could ultimately be developed under this alternative, long-term environmental effects associated with the No Project alternative, including traffic increases and noise, theoretically are similar to those of the project. However, because redevelopment tax-increment revenue would not be available to fund public improvements or assist in consolidating small and poorly configure lots into developable parcels, this alternative would not alleviate blight in the Project Area.

Unlike many of the surrounding neighborhoods and commercial areas, the Project Area was developed in a more inconsistent land use pattern, with incidents of conflicting residential/industrial and residential/commercial uses spread throughout the Project Area. These land use conflicts have resulted in serious incompatibilities between existing uses and have discouraged investment and development in the area. Without redevelopment powers and funding, these conditions would remain. Market disincentives to private sector development would continue, making development of underlying zoning such as the Transit Village Plan difficult and less likely. Even if market conditions improved in the Transit Village Plan area and some development occurred, the remaining Project Area would continue to remain stagnant.

Under this alternative, the deteriorated housing; blighted, vacant, underutilized, and marginal heavy commercial and industrial uses; vacant properties; inadequate infrastructure; and lack of community facilities would be expected to remain in the Project Area. These uses are likely to continue to decline and adversely affect adjacent uses. Due to the dilapidation and deterioration of many of the Project Area buildings, and the escalating costs involved in maintenance and upkeep of those structures, it is very likely that most of these structures will continue to decline in appearance and structural integrity, further contributing to the blighting conditions within the Project Area. As evidenced by the lack of investments to existing properties over the past several years, many property owners are not able to upgrade their properties or are unwilling to due to a fear of lack of return on investment.

Due to old age and escalating costs involved in meeting modern construction standards established to ensure the health and safety of the building occupants, it is likely that many Project Area buildings will continue to be characterized by defective physical construction; the defective layout of the aforementioned buildings on commercial properties, which do not accommodate adequate setbacks and vehicle circulation space, will continue to place persons in harm.

Under the No-Project alternative, it is anticipated that occurrences of incompatible uses in the Project Area will continue. This includes residential uses located adjacent to industrial or commercial uses, which create a potentially hazardous coexistence with surrounding residents. In many cases, adjacent commercial and industrial uses lack buffers (set backs, sound walls, and landscaping) between sensitive residential uses to mitigate noise, air pollution, and visual impacts. Residential units neighboring an industrial or commercial use experience nuisances such as noise,

traffic and fumes, which impacts the quality of life and property values. Industrial uses emit noxious or toxic fumes, store dangerous chemicals on site, and make loud noise. These operations can even go on after dark furthering the nuisance to residents throughout most hours of the day. These conditions would be anticipated to continue without redevelopment funding and tools to support the voluntary relocation of housing and improved development standards.

Approximately seven properties within the Project Area have been identified as those containing open cases of leaking underground storage tanks. These sites are spread throughout the Project Area with the majority of the sites having groundwater contamination with petroleum hydrocarbons associated with automotive repair or other chemicals associated with manufacturing. Under the No-Project alternative, the Redevelopment Agency could not use the Polanco Act or tax increment to assist in remediation, and these contaminated properties would continue to lack the funds and/or incentives necessary for appropriate cleanup. The continuation of these conditions would maintain an undesirable environment for the development of new uses - preventing or substantially delaying the revitalization of the Project Area.

Less quality affordable housing would be provided without the availability of set-aside redevelopment funds. Less attention to identifying contaminated sites prior to reuse could result in human exposure to hazardous materials for small business owners. This area, close to Downtown Sacramento with excellent transit, would likely remain underutilized in conflict with the City's and region's goals to promote infill development and reduce demand for development on the urban fringe, thus regional air quality and traffic impacts would be greater. Without funding for rehabilitation, potentially historic buildings in the Project Area could be lost to severe deterioration.

Since the long-term environmental impacts could be greater than those of the Redevelopment Plan and physical blighting conditions are likely to remain in the Project Area, and since most blighting conditions are likely not to be eliminated under this alternative, this alternative is considered environmentally inferior to the proposed project.

Relation to Project Objectives: Without redevelopment assistance, development under this alternative may occur haphazardly on smaller sites. Street improvements, drainage and other infrastructure improvements, community facilities, and rehabilitation of housing would unlikely be funded to the extent that these are anticipated to be funded as a result of the Redevelopment Plan. The potential for integrated projects of substantial size suitable for portions of the Project Area and consistent with the Transit Village Plan would be limited, and blighting conditions and influences are likely to remain. Therefore, this alternative would not achieve the key project objectives.

5.2.2 NO REDEVELOPMENT PLAN - ALTERNATIVE MEANS OF REVITALIZATION WITH PUBLIC FUNDS

This alternative considers utilization of public revenue sources other than tax increment financing to fund public improvements and other actions in the Project Area. Federal, State, County, and City programs exist that may initiate similar development without the need for redevelopment tax increment financing. These sources of alternative funding typically include mortgage revenue bonds, Community Development Block Grant funds (CDBG), Economic Development Administration funds, State and Federal Transportation Grants, Urban Development Action funds, and revenue bonds. Some of the potential funding sources are capped each year for the City, such as CDBG

funds, and many of these funds require application and competition and cannot be relied upon to be available consistently over the next 30 years. Any such funds used in the 65th Street Project Area are funds unavailable to alleviate blight in other parts of the City.

Project Area Development: If consistently available, these alternative-funding mechanisms could continue to encourage redevelopment within the Project Area. However, these programs do not carry with them the powers of a redevelopment agency to assemble parcels for more modern development patterns or to use the Polanco Act to remediate contaminated properties, which could restrict the development potential of the Project Area and limit the scope and scale of development and rehabilitation. Significantly reduced levels of available funding for infrastructure improvements and housing would significantly slow the pace of improvements, and may limit improvements to the areas around the light rail station, leaving most of the Project Area blighted.

Environmental Effects: Since these alternative-funding mechanisms could encourage some development in the Project Area, impacts associated with such development could be similar to those of the project. Less redevelopment is anticipated to occur with the limitations in the funding sources to reduce area blight and consolidate small and irregular parcels, or be delayed by inconsistent funding. In the immediate Project Area, this could result in lower traffic levels, reduced emissions and less demand on public services such as water, sewer, etc. However, any reduction in localized traffic impacts from less development/lower densities in the Project Area would likely be offset by regional increases in traffic and air emissions as development demand was met further away from the downtown employment center, and to the extent the opportunity to provide increased residential and commercial densities within walking distance of a light rail station was not met. Therefore, this alternative has mixed adverse and beneficial environmental effects when compared with the project.

Relation to Project Objectives: If consistently and continually available, with a focused effort by the City, these alternative-funding mechanisms could achieve key objectives of the project.

However, the City has many demands on its available grants and other economic development and affordable housing resources, and shifting these funds to the Project Area would have to compete with the City's need to reduce blight in other parts of the City. Each of these alternative sources of funds also has its own unique limitations on use, application requirements, eligibility, and funding priorities. Both the City and the County also have limited influence over the funding programs operated by other agencies. Thus, the continued availability of outside sources of funding cannot be guaranteed through 30 years in the way the Redevelopment Plan could provide a steady source of funding.

If outside funding mechanisms are relied upon for necessary public improvements, and those funds are no longer available, the necessary public improvements and other actions needed to alleviate blighting conditions in the Project Area may not be undertaken. The lack of necessary public improvements along with increased growth both in the Project Area and in adjacent areas may create new or exacerbate potential significant impacts on existing and new development. In addition, the Redevelopment Plan requires 20 percent of tax increment to be set aside for the development and improvement of affordable housing. Outside sources of funding may not provide comparable provision for this public need.

Due to the uncertainty of available funding for necessary public improvements and other blight removal actions and lack of a specific housing provision, the achievement of the redevelopment plan goals could not be ensured. Therefore, this alternative, although feasible, is considered unlikely to achieve the key project objectives.

5.3 COMPARISON OF IMPACTS

The following discussion presents a comparison of the impacts of the Alternative Means of Revitalization with Public Funds Alternative and the No Project Alternative to the impacts of the proposed project (adoption and implementation of the 65th Street Redevelopment Plan):

- **Land Use, Plans and Policies.** Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, existing development activities could continue to occur in the Project Area at different rates, consistent with adopted plans and policies. Existing non-conforming and deteriorated land uses would be more likely to remain, with no formalized mechanism for their rehabilitation or removal. Lack of infrastructure funding would probably result in the delay of or inability to develop some of the planned transit village land uses necessary to promote transit usage and provide affordable housing near the university. While the current General Plan housing and economic development goals would remain in place, achievement of these goals would be attenuated by the lack of infrastructure improvements, incentives for private sector investment, and 20 percent set-aside funding for housing that would occur under the Redevelopment Plan.
- **Transportation/Circulation.** Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, lack of or insufficient funding to construct necessary street improvements and provide incentives for new development would probably result in the delay of or inability to develop some of the planned housing, industrial and commercial space in the Project Area. A lower level of new development would result in less local traffic within the Project Area than anticipated under the General Plan. However, cumulative conditions in and surrounding the Project Area would continue to worsen with regional growth, as the planned transit oriented land uses did not develop. Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, the City would have to use other resources to provide the traffic, streetscape and infrastructure improvements proposed as part of the General Plan and Transit Village Plan, if available, or delay construction. Roadway conditions and cumulative traffic conditions would be worse under either alternative.
- **Air Quality.** Lack of infrastructure funding would probably result in the delay of or inability to develop some of the planned infrastructure improvements and housing, industrial and commercial space in the Project Area. A lower level of new development could result in fewer air quality impacts from construction, including less generation of fugitive dust. The Alternative Means of Revitalization with Public Funds and the No Project Alternatives could result in smaller increases in population and employment, and thus, lower direct emissions of criteria pollutants from stationary and mobile sources in the Project Area. However, the Project Area is considered an infill area and transit opportunity area where development should occur to reduce vehicle miles traveled in the region. The Alternative Means of Revitalization with Public Funds and the No Project Alternatives could ultimately result in worsened cumulative conditions in the air basin, as development moves outward into areas with lower development costs and students

travel farther from affordable housing to the university, resulting in an increase in vehicles miles traveled. Regional air quality impacts would be worse under either alternative.

- **Biological Resources.** The Alternative Means of Revitalization with Public Funds and the No Project Alternatives would likely result in continuing existing development patterns in most of the Project Area. Less land coverage and development would result in fewer potential impacts to habitat and special status species than under General Plan buildout. Impacts to sensitive species will be dependent upon the size and location of site specific development over time, but could be less than under the Redevelopment Plan
- **Noise.** Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, lack of or insufficient funding to construct necessary street improvements and provide incentives for new development would probably result in the delay of or inability to develop some of the planned housing, industrial and commercial space in the Project Area. A lower level of new development could result, in the short term, in somewhat less construction and traffic noise within the Project Area. However, streetscape and roadway improvements, housing rehabilitation and the elimination of incompatible land uses also would not occur. Overall, noise impacts on sensitive receptors would be the same or worse under the alternatives.
- **Cultural Resources.** Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, lack of or insufficient funding for housing rehabilitation or to construct necessary street improvements and provide incentives for new development would probably result in the delay of or inability to develop some of the planned housing, industrial and commercial space in the Project Area. A lower level of new development could result in less disruption of cultural resources within the Project Area. However, rehabilitation of buildings over 50 years old consistent with the Secretary of the Interior Standards would help support the survival of historic buildings in the Project Area. Without the funding available with the proposed Redevelopment Plan, older buildings in the area will likely continuing to deteriorate, and more historic fabric would be lost over time. Cultural resource impacts would be the same or worse under the alternatives.
- **Hazards and Hazardous Materials.** Under the Alternative Means of Revitalization with Public Funds and the No Project Alternatives, lack of or insufficient funding could cause the delay of or inability to redevelop blighted industrial and commercial space in the Project Area, and to rehabilitate existing structures that may contain asbestos and lead based paint. Long term exposure to contamination or ongoing contamination of groundwater would continue rather than being remediated through redevelopment activities. Hazards and hazardous materials impacts would be worse under the alternatives.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The implementation activities identified with the Redevelopment Plan are intended to mitigate existing problems and to remove barriers to planned development within the Project Area. By providing the means to eliminate physical and economic blighting conditions in the Project Area and thereby stimulate and encourage the revitalization, reuse and new development of Project Area properties, the proposed Redevelopment Plan is the environmentally superior alternative. Under the Redevelopment Plan, inadequate water, sewer and drainage infrastructure may be upgraded, circulation and pedestrian safety will be improved, hazardous materials will be remediated, dangerous/vacant buildings removed or rehabilitated and reused, and historic resources may be

preserved. Because of the unique nature and purpose of redevelopment and the blight requirements of where it can be applied, implementation of the Redevelopment Plan will have an overall beneficial impact on the Project Area. Project specific impacts for construction activities funded by redevelopment will be primarily short-term in nature (i.e., construction noise), and the City has policies, procedures and standards in place to mitigate and manage potential impacts of development.