

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 SEIR. 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 Sacramento Army Depot Redevelopment Plan 3rd Amendment (“Amendment”). 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 CEQA 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 by staff and the environmental consultant, 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 Amendment is to extend the Redevelopment Agency’s ability to alleviate blight and encourage economic recovery into areas around the Army Depot to the west and south. Because of the nature of the Amendment, which is to alleviate blight and remove barriers to development and encourage economic recovery in areas that have been defined as containing significant blight, there are no other locations that could accommodate the project objectives. Implementation of an off-site alternative to the proposed Amendment was deemed not feasible, and no off-site alternative has been considered or evaluated in this SEIR.
- **Alternative Public Actions.** During preparation of the Amendment alternative strategies for redevelopment of the Added 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 Amendment. It was determined that the list of proposed public improvements and facilities represented the best mix of actions, consistent with the goals and objectives of the Amendment, to assist in the redevelopment of the Added Area. The projects 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 Added Area. This alternative would not have reduced any of the significant

effects of the proposed project. It is for that reason that this SEIR does not consider an alternative list of public improvements and facilities.

- **Alternative Added Area Boundaries.** The Added Area boundaries were defined according to redevelopment law, based on definitions of blight and urbanization, and through extensive public consultation to determine what Added 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 Added Area that could be protected by excluding any particular area from the Added Area, thus no environmental impacts would be reduced by modifying the Added Area boundaries. It is for these reasons that this SEIR does not consider alternative project area boundaries.

5.2 ALTERNATIVES TO THE PROPOSED ACTION

5.2.1 NO-PROJECT ALTERNATIVE

Under the No-Project Alternative, the Sacramento Army Depot Redevelopment Plan would not be amended to expand the boundaries to include the Added Area. The proposed public improvements and development assistance that would be assisted with redevelopment (such as public infrastructure improvements, commercial/industrial rehabilitation/development and low- and moderate-income housing assistance) would not be implemented with redevelopment funding. The "No Project" alternative considers what physical changes would be expected to occur in the Added Area if the proposed Amendment was not approved, and development in the Added Area would occur as currently defined in the Sacramento General 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 by funding public improvements, 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 Added Area may be prevented or may occur at a significantly slower rate than would be the case with the adoption of the Amendment. Blighting conditions, including high crime rates, residential overcrowding, factors hindering the economically viable use of lots, lots of irregular form and shape and inadequate size that are under multiple ownership, depreciated property values, vacant parcels, incompatible uses, serious building code violations, high frequency of litter and debris violations and unsafe/unhealthy buildings, would remain in the area. Because of these blighting conditions, much of the Added Area could be expected to continue declining, with physical deterioration, vacancies, and serious building code violation occurrences 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 unlikely to develop due to the conditions noted above. The amount of development would likely be substantially less and consist of less varied uses reflective solely of the limited market demand at a given time. The No-Project scenario would be similar to any aged and blighted urban area, where the Added Area would stay a marginal area with inadequate infrastructure, high levels of crime, a deteriorating housing stock and high commercial/industrial

vacancies, despite the underlying zoning. Quality of development would be poor, blight would persist, and the housing stock would continue to deteriorate.

Environmental Effects: Because general land use types, densities, and intensities that could be developed pursuant to the Amendment could ultimately be developed under this alternative, long-term environmental effects associated with the No Project Alternative, including traffic increases and noise, theoretically may be similar to those of the project. However, because redevelopment tax-increment revenue would not be available to a) assist in consolidating undersized and oddly configured lots into developable parcels, b) provide infrastructure improvements, c) provide assistance to eliminate dangerous and substandard buildings, d) assist in remediating groundwater and soil contamination, or e) providing development incentives and area-wide cleanup, this alternative would not alleviate conditions of blight and public health and safety concerns in the Added Area. The continuation of such conditions makes it unlikely that new development will occur in this area without public assistance.

The Added Area has developed in an inconsistent land use pattern, with incidents of conflicting residential/industrial and residential/commercial uses spread throughout the area. This includes residential uses located adjacent to industrial or commercial uses, which create a potentially hazardous coexistence with surrounding residents. Many of the incompatible 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.

Under the No Project Alternative, the deteriorated housing; blighted, underutilized and marginal commercial and industrial uses; vacant properties; inadequate infrastructure; high crime rates; litter and debris and a high percentage of buildings that are deemed dangerous and substandard would be expected to remain in the Added Area. These uses are likely to continue to decline and adversely affect adjacent land uses, adversely affecting the ability to improve the Existing Army Depot Project Area and surrounding neighborhoods. Due to the dilapidation and deterioration of many of the Added 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 and health and safety issues within the Added 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 Added Area buildings will continue to be characterized by defective physical construction.

Properties within the Added Area have been identified as containing open cases of leaking underground storage tanks and other hazardous substance contamination, including drug lab. These sites are spread throughout the Added 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 Added 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 Added Area could be lost to severe deterioration.

Since the long-term environmental impacts could be greater than those of the Amendment and physical blighting conditions are likely to remain in the Added Area, and since most blighting conditions are not likely to be eliminated under this alternative, which would not meet the City's and Agency's project objectives, 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 Amendment. The potential for integrated projects of substantial size suitable for new development 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 AMENDMENT - 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 Added 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 Added Area are funds unavailable to alleviate blight in other parts of the City.

Added Area Development: If consistently available, these alternative-funding mechanisms could eliminate blight and encourage some development within the Added 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 Added Area and limit the scope and scale of development and rehabilitation. Significantly reduced levels of available funding for infrastructure improvements and housing would slow the pace of improvements, leaving much of the Added Area blighted and unable to achieve the property values required to allow development to occur without public assistance.

Environmental Effects: Since these alternative-funding mechanisms could encourage some development in the Added 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 Added Area, this could result in lower traffic levels, reduced emissions and less demand on public services such as water and sewer. However, any reduction in localized traffic impacts from less development/lower densities in the Added 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 close to employment centers went unfulfilled. 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 Added 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 the decades that the Amendment 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 Added Area may not be undertaken. The lack of necessary public improvements along with increased growth both in the Added Area and in adjacent areas may create new or exacerbate potential significant impacts on existing and new development. In addition, the Amendment 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 Amendment 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 Amendment):

- **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 Added 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 planned land uses. 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 Amendment.
- **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 or rehabilitate planned housing, industrial and commercial space in the Added Area. A lower level of new development would result in less local traffic within the Added Area than anticipated under the General Plan. However, cumulative conditions in and surrounding the Added Area would continue to worsen with regional growth, as the planned infill 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, 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 infill housing, industrial and commercial space in the Added 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 Added Area. However, the Added Area is considered an infill 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 better economic conditions, 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 Added 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 Amendment.

- **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 Added Area. A lower level of new development could result, in the short term, in somewhat less construction and traffic noise within the Added 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 either alternative.
- **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 Added Area. A lower level of new development could result in less disruption of cultural resources within the Added 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 Added Area. Without the funding available with the proposed Amendment, older buildings in the area will likely continue to deteriorate, and more historic fabric would be lost over time. Cultural resource impacts would be the same or worse under either alternative.
- **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 Added 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 either alternative.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The implementation activities identified with the Amendment are intended to mitigate existing problems and to remove barriers to planned development within the Added Area. By providing the means to eliminate physical and economic blighting conditions in the Added Area and thereby stimulate and encourage the revitalization, reuse and new development of Added Area properties, the proposed Amendment is the environmentally superior alternative. Under the Amendment, 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 Amendment will have an overall beneficial impact on the Added 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.