

5 PROJECT ALTERNATIVES

5.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS

The State CEQA Guidelines require analysis of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project's basic objectives and avoid or substantially lessen any of the significant effects of the project (Section 15126.6[a]). The range of potentially feasible alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The potential feasibility of an alternative may be determined based on a variety of factors, including economic viability, availability of infrastructure, and other plans or regulatory limitations. Specifically, Section 15126.6(f) (1) of the State CEQA Guidelines states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). The State CEQA Guidelines further require that the alternatives be compared to the project's environmental impacts and that the "no project" alternative is considered (Section 15126.6[d] [e]).

An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the project. The requirement that an EIR evaluate alternatives to the project or alternatives that address the location of the project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the Public Resources Code (PCR) and the CEQA Guidelines direct that the EIR need "set forth only those alternatives necessary to permit a reasoned choice." The ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body (see PRC Section 21081[a] [3].)

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CEQA Guidelines Section 15126.6[a]). Chapter 2, *Project Description*, articulates the following project objectives:

- ▲ amend the Sphere of Influence (SOI) boundary beyond the existing Folsom city limits to accommodate a municipal corporation yard use compatible with the City of Folsom and Sacramento County policies;

- ▲ implement the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 consistent with public service conditions present or reasonably foreseeable in the Folsom Corporation Yard SOIA/annexation area;
- ▲ establish an expanded SOI and city boundary for the City of Folsom that will provide a new corporation yard site and facilitate the protection of important environmental, cultural, and agricultural resources;
- ▲ provide a location within city boundaries to develop a consolidated corporation yard to improve operating efficiencies, minimize duplication of material and equipment, minimize unproductive travel time between sites, improve staff coordination and supervision, minimize land use conflicts, and improve overall site security; and
- ▲ provide a new corporation yard site which would remove current corporation yard uses from the City's Historic District and other locations where land use conflicts are present.

5.2.2 Environmental Impacts of the Project Impacts

Sections 3.1 through 3.12 of this Draft EIR address the environmental impacts of implementation of the Folsom Corporation Yard SOIA/annexation. Alternatives to the project site were considered. However, as described in Section 5.3, *Alternatives Dismissed from Detailed Evaluation*, none were found to be feasible. Therefore, the only alternative to the project would be the no action alternative, which is analyzed in comparison to the project in Section 5.4, *Analysis of Alternatives*. The significant impacts of the project are:

Aesthetics: The project could result in the following impacts:

- ▲ While approval of the SOIA/annexation alone would not result in physical visual changes to the site, future development of the SOIA/annexation area would convert the open space character of project site to corporation yard uses, which would further expand suburban development conditions south of the existing City of Elk Grove. This may substantially alter public views. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.1-1)
- ▲ The project would change the existing views on the site from open space grasslands to a more industrial setting. Future construction on site would cause the removal of grasslands and of trees and introduce urban development in an area which is generally natural and could degrade the visual character or quality of the site. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.1-2)
- ▲ The project would lead to the construction of urban buildings on the site. While the City has a policy reduce light and glare impacts off site, no specific measures are included that would ensure lighting from the site would not trespass to offsite areas and adversely affect travelers and future neighbors of approved developments. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.1-3)

Agriculture and Forestry Resources: The project could result in the following impacts:

- ▲ While the SOIA/annexation would not result in direct physical changes to the site, it would facilitate future development of more than 50 acres of farmland, as defined by Sacramento County. It would also facilitate the conversion of approximately 50 acres of prime farmland, as defined by LAFCo. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.2-1)

Air Quality: The project could result in the following impacts:

- ▲ Construction-related activities from a future corporation yard would result in emissions of ROG, NO_x, PM₁₀, and PM_{2.5} from site preparation (e.g., excavation, clearing), off-road equipment, material and equipment delivery trips, and worker commute trips, and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings). Construction activities would not result in mass emissions of ROG, NO_x, PM₁₀, and PM_{2.5} that would exceed SMAQMD's thresholds of significance. Therefore, construction-generated emissions would not contribute to the existing nonattainment status of the SVAB for ozone and PM. This impact would be **less than significant**. (Impact 3.3-1)
- ▲ Implementation of a future corporation yard would not result in long-term operational emissions of ROG, NO_x, and PM₁₀ that exceed SMAQMD's thresholds of significance (65 lb/day for ROG, 65 lb/day for NO_x, 80 lb/day and 14.6 tons/year for PM₁₀). Therefore, operation-generated emissions would not conflict with the air quality planning efforts and contribute substantially to the nonattainment status of SVAB with respect to ozone and PM₁₀. This impact would be **less than significant**. (Impact 3.3-2)
- ▲ Long-term operation-related local mobile-source emissions of CO generated by the development a future corporation yard would not violate a standard or contribute substantially to an existing or projected air quality violation or expose sensitive receptors to substantial pollutant concentrations. As a result, this impact would be **less than significant**. (Impact 3.3-3)
- ▲ Construction- and operation-related emissions of TACs associated with the implementation of a future corporation yard would result an incremental increase in cancer risk greater than 10 in one million or a hazard index greater than 1.0 at existing or future sensitive receptors. Mitigation measures have been identified that would reduce significant impacts related to TACs would be reduced to **less than significant**. (Impact 3.3-4)
- ▲ A future corporation yard would introduce new odor sources into the area (e.g., temporary diesel exhaust emissions during construction and heavy-duty trucks associated with industrial land use). Construction and long-term operation of a future corporation yard would not result in the exposure of sensitive receptors to excessive odors. Therefore, this impact would be **less than significant**. (Impact 3.3-5)

Biological Resources: The project could result in the following impacts:

- ▲ Future development of the SOIA/annexation area could result in the disturbance or loss of several special-status plant species. Because the loss of special-status plants could substantially affect the abundance, distribution, and viability of local and regional populations of these species, this would be a potentially significant impact. Mitigation measures have been identified that would reduce significant impacts on special-status plants to a **less-than-significant** level. (Impact 3.4-1)
- ▲ Future development of the proposed SOIA/annexation area could adversely affect several special-status wildlife species, including amphibians, nesting birds, mammals, and invertebrates. Future development activities such as ground disturbance and vegetation removal, as well as overall conversion of habitat to urban uses, could result in the disturbance or loss of individuals and reduced breeding productivity of these species. Special-status wildlife species are protected under ESA, CESA, California Fish and Game Code, CEQA, or other regulations. Mitigation has been identified to minimize these impacts but would not reduce all impacts to a less-than-significant level. Impacts pertaining to loss of foraging habitat for local nesting Swainson's hawks would remain **significant and unavoidable**. (Impact 3.4-2)
- ▲ Seasonal wetlands, intermittent drainages, and vernal pools are present within the SOIA/annexation area. Future land use changes and development would result in conversion of wetland habitat to urban uses. Mitigation measures have been identified that would reduce significant impacts on wetlands, vernal pools, and other waters to a **less-than-significant** level. (Impact 3.4-3)

- ▲ A large valley oak tree that would qualify as a “heritage tree” under the City of Folsom Tree Preservation Ordinance is present within the northeastern corner of the property. However, future development of the SOIA/annexation area does not include plans to remove the tree. Because the one “heritage tree” within the SOIA/annexation area would not be removed under the project, impacts would be **less than significant**. (Impact 3.4-4)
- ▲ Future land use changes and development within the SOIA/annexation area would result in loss of grassland and wetland habitats but would not substantially impede wildlife movement because the project site is relatively small, and near existing urban development. The project site does not contain any native wildlife nursery sites. Impacts to movement corridors and habitat connectivity for these species would be **less than significant**. (Impact 3.4-5)

Cultural and Tribal Cultural Resources: The project could result in the following impacts:

- ▲ The cultural resources inventory revealed two historical resources on the project site, P-34-335 and P-34-1555. The project would not alter the mining district and minor alterations to the road would not affect its NRHP-eligibility; therefore, the impact to historical resources would be **less than significant**. (Impact 3.5-1)
- ▲ Based on the results of the cultural resources report, there is one archaeological resource within the project site that has been evaluated as eligible for the NRHP. There are no known prehistoric-era archaeological sites within the SOIA/annexation area. Future development of the site could impact the known archaeological resource and ground-disturbing activities from future corporation yard development could also result in discovery or damage of as yet undiscovered archaeological resources as defined in CEQA Guidelines Section 15064.5. Mitigation measures were identified that would reduce the impact to a **less-than-significant** level. (Impact 3.5-2)
- ▲ Although unlikely, construction and excavation activities associated with future development of the SOIA/annexation area could unearth previously undiscovered or unrecorded human remains, if they are present. Compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 in the event that human remains are found would make this impact **less than significant**. (Impact 3.5-3)
- ▲ The project site is underlain with metamorphic rock and Mesozoic granite, which have a low paleontological potential. No paleontological resources are known to occur within the project site or a one-mile radius of the site. Therefore, this impact would be **less than significant**. (Impact 3.5-4)

Energy: The project could result in the following impacts:

- ▲ The City’s corporation yard operations are currently split among multiple sites, and the existing sites cannot meet current and projected City corporation yard requirements. Existing yard operations are housed in older buildings which are poorly configured and inadequately sized for current needs, resulting in many operating inefficiencies. Municipal transportation energy consumption is necessary to serve the City and various department needs. Therefore, energy and fuel consumption associated with the future corporation yard operation would not be considered inefficient, wasteful, or unnecessary. Thus, this impact would be **less than significant**. (Impact 3.6-1)
- ▲ Electrical and natural gas infrastructure would need to be extended by SMUD and PG&E to meet the energy needs of the development of the future corporation yard. If determined to be necessary, offsite improvements to electrical and natural gas facilities would be the responsibility of the utility and would be analyzed by the utility provider under separate environmental review. Neither LAFCo nor the City of Folsom would have control over the approval, timing, or implementation of any electrical or natural gas facility improvements. Furthermore, the project may result in encroachment onto SMUD’s transmission easements. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.6-2)

Greenhouse Gas Emissions and Climate Change: The project could result in the following impacts:

- ▲ The level of annual GHG emissions associated with the project, including amortized construction-related emissions, would be approximately 1,052 MT CO₂e/year. This level of GHG emissions has the potential to result in a considerable contribution to cumulative emissions related to global climate change and conflict with State GHG reduction targets established for 2030 and 2050. Mitigation measures were identified that would reduce the impact to a **less-than-significant** level. (Impact 3.7-1)
- ▲ The project is not located within an area projected to experience a substantial increase in wildland fire risk or flooding as a result of climate changes in the future. Anticipated changes in future climate patterns are not anticipated to have any substantial adverse effects on the project. Therefore, the impacts of climate change on the project would be **less than significant**. (Impact 3.7-2)

Hazards and Hazardous Materials. The project could result in the following impacts:

- ▲ Future development of the SOIA/annexation area from future annexation could result in water quality degradation from construction activities, as well as from operational sources of water pollutants. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.8-1)
- ▲ Future development of the SOIA/annexation area could expose construction workers to hazardous materials present on site during construction activities and hazardous materials on site could create an environmental or health hazard for later residents or occupants, if left in place. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.8-2)
- ▲ Future development of the SOIA/annexation area would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. This impact would be **less than significant**.

Hydrology and Water Quality: The project could result in the following impacts:

- ▲ Development of the project site as a future corporation yard could result in water quality degradation from construction activities, as well as from operational sources of water pollutants. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.9-1)
- ▲ Future development would result in creation of impervious surfaces of sufficient area in relation to the size of the groundwater basin that could interfere with groundwater recharge. In addition, water supply for future development of the project site would not be from groundwater. Project groundwater impacts would be **less than significant**. (Impact 3.9-2)
- ▲ Future development of the project site could lead to alteration of the drainage pattern of the site. This could result in increased stormwater runoff and an increase in susceptibility to downstream flooding and sediment issues. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.9-3)

Noise and Vibration: The project could result in the following impacts:

- ▲ Short-term construction-generated noise levels associated with the future development of the SOIA/annexation area could expose nearby noise-sensitive receptors to noise levels that exceed applicable local standards. If construction activity were to occur during more noise-sensitive nighttime hours, it could result in annoyance and sleep disruption to occupants of nearby residential land uses and substantial periodic increases in ambient noise levels. Mitigation has been identified to minimize this impact but would not reduce it to a less-than-significant level. Therefore, the impact would be **significant and unavoidable**. (Impact 3.10-1)
- ▲ Future development of a future corporation yard within the SOIA/annexation area would generate vehicle trips and result in an increase in ADT volumes on affected roadway segments; and thus, an increase in

traffic source noise levels. However, surrounding receptors would not be exposed to traffic noise levels or traffic noise level increases that exceed applicable City of Folsom or Sacramento County noise standards. This impact would be **less than significant**. (Impact 3.10-2)

- ▲ Intermittent SENL's from project generated truck trips passing offsite sensitive receptors during the more noise-sensitive hours would not exceed 65 SENL. Therefore, the percentage of people expected to be awakened when inside the affected homes would not exceed 5 percent. This impact would be **less than significant**. (Impact 3.10-3)
- ▲ The SOIA/annexation area could result in future corporation yard land uses in close proximity to noise-sensitive land uses. Thus, offsite receptors could experience project-generated noise levels that exceed the City's daytime and nighttime noise levels standards. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.10-4)

Transportation and Circulation: The project could result in the following impacts:

- ▲ Implementation of the project would add an estimated 83 a.m. peak hour and 31 p.m. peak hour trips to the roadway network in the study area. Based on the traffic modeling and analysis, all study area intersections would operate at acceptable levels of service except for the Scott Road (West)/White Rock Road intersection, which would worsen from LOS D to LOS E in the a.m. peak hour. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.11-1)
- ▲ Implementation of the project would not add trips to US 50 and would not cause queuing at any freeway off-ramps to approach or extend beyond its storage capacity. Therefore, this impact would be **less than significant**. (Impact 3.11-2)
- ▲ Implementation of the project would not generate new demand for transit trips during either peak hour and would not adversely affect existing transit routes. Furthermore, the project would expand transit storage facilities and office space for administrative employees, which helps the City of Folsom Transit Division to better meet demand. Therefore, this impact would be **less than significant**. (Impact 3.11-3)
- ▲ The project would not adversely affect existing or planned bicycle facilities, result in unsafe conditions for bicyclists, or fail to adequately provide for access by bicycle. Therefore, this impact would be **less than significant**. (Impact 3.11-4)
- ▲ Project construction may require restricting or redirecting pedestrian, bicycle, and vehicular movements at locations around the site to accommodate construction, staging, and modifications to existing infrastructure. Such restrictions could include lane closures, lane narrowing, and detours. Mitigation has been identified that would reduce this impact to a **less-than-significant** level. (Impact 3.11-5)

Utilities and Service Systems: The project could result in the following impacts:

- ▲ Implementation of the project would interconnect with water and wastewater infrastructure constructed as part of the FPASP development area immediately north of the project site. All onsite facilities have been evaluated throughout the resource chapters of this EIR. As a result, the project would have **less-than-significant** wastewater and water supply facility impacts. (Impact 3.12-1)
- ▲ Presently, there are no public water supply facilities within the project site and the project site is not served by a water purveyor. Implementation of the project would increase surface water supply demands in the City by six (6) acre-feet annually. Pursuant to the City's 2015 Urban Water Management Plan, the City has adequate water supplies to serve the project under normal, dry, and multiple-dry year conditions. This impact would be **less than significant**. (Impact 3.12-2).
- ▲ The SRWWTP has a design capacity of 181 mgd with the potential to expand to 218 mgd. Future development of the project site according to the conceptual land use plan is estimated to generate less

than 0.012 mgd of wastewater. The SRWWTP would have adequate capacity to treat wastewater flows generated by future development of the project site. This impact would be **less than significant**. (Impact 3.12-3)

- ▲ Based on the current rates of solid waste generation and the capacity of the landfills that serve the area, development of the project site with a future corporation yard would have a **less-than-significant** impact on the permitted capacity of the affected landfills. (Impact 3.12-4)

5.3 ALTERNATIVES DISMISSED FROM DETAILED EVALUATION

The City of Folsom has known for a while that a new corporation yard location is needed to meet long-term growth needs (as described in Chapter 2, *Project Description*). During the last 10 years, the City has considered and rejected a variety of alternative locations. The following provides a description of the locations considered and rejected because of their lack of feasibility.

5.3.1 Alternative Sites Located Within the City Boundaries

The City, north of U.S. Highway 50, has few vacant parcels that are appropriately zoned to allow for a corporation yard. A corporation yard is allowed on land that is zoned either M-1, Light Industrial, or M-2, General Industrial. In a November 2017 analysis of all non-residential land, the City found 33 parcels with some development capacity (Johnson, pers. comm., 2017). Of these, only three were zoned either M-1 or M-2. Exhibits 5-1, 5-2, and 5-3 show the locations of each of these parcels

- ▲ **Location 1** is approximately 5 acres. As shown in Table 2-1, the City needs between approximately 19 acres (current needs) to approximately 34 acres (future needs) to meet its facility needs. Therefore, the site is too small to meet the City's corporation yard needs. This site is located in close proximity to the American River which could provide challenges in meeting the project objective of protecting important environmental resources.
- ▲ **Location 2** is approximately 30 acres. As seen on Exhibit 5-2, this site is adjacent to an existing Kikkoman manufacturing plant. The land available around the plant is for future expansion of the Kikkoman manufacturing facility and is not currently for sale. The site is also in close proximity to the American River and adjacent to existing residential neighborhoods along Sibley and Bidwell Streets, and would provide challenges in meeting the project objectives of protecting important environmental resources and removing land use conflicts by relocating the corporation yard out of residential neighborhoods.
- ▲ **Location 3** is 1.1 acres. It is located adjacent to the City's current corporation yard, in close proximity to the American River and existing residential neighborhoods, and is too small to accommodate an expansion of corporation yard activities. In addition, it also would provide challenges in meeting the project objectives of removing land use conflicts and protecting important environmental resources.

These three sites were considered but were found to not be feasible alternatives to the proposed site and, therefore, were rejected from further evaluation.

The City also considered whether there were potential sites within the FPASP area (south of U.S. Highway 50). The FPASP includes two land use designations—Industrial / Office Park (IND/OP) and Public/Quasi-Public (PQP)—that were considered for use for a corporation yard. While IND/OP could be zoned as M-1, per Table A.7 of the FPASP, the IND/OP designation does not allow for outdoor storage or vehicle repair and maintenance uses. The City estimates that, at buildout, it would need approximately 858,000 square feet of uncovered exterior space and 117,000 square feet of covered exterior space (Table 2-2). Therefore, land designated as IND/OP is not appropriate for corporation yard use.



Source: City of Folsom 2017

Exhibit 5-1

Location 1





Source: City of Folsom 2017

Legend

- Location Boundary
- City of Folsom Boundary

0 500 1,000
Feet



Aerial: NAIP 2016

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The PQP designation allows for corporation yard uses, including outdoor storage and city maintenance yards (Table A.13 of the FPASP). There are 14 sites designated for PQP uses (Table 5-1). The larger sites of PQP-designated land are reserved for public schools. The Folsom Cordova Unified School District has reviewed and approved the school locations and changing the use to a City corporation yard would not be an acceptable change to the Folsom Cordova Unified School District. These school sites were required by the school district to meet their mandatory requirements for adequate service and to meet the objective to “[p]rovide a combined high school/middle school and the appropriate elementary schools [within the FPASP area] sufficient to meet the needs of the [FPASP development]” (Folsom 2011). Because the FPASP was adopted, the Folsom Cordova Unified School District requested and approved changing the combined high school/middle school site to two separate sites (FCUSD 2018).

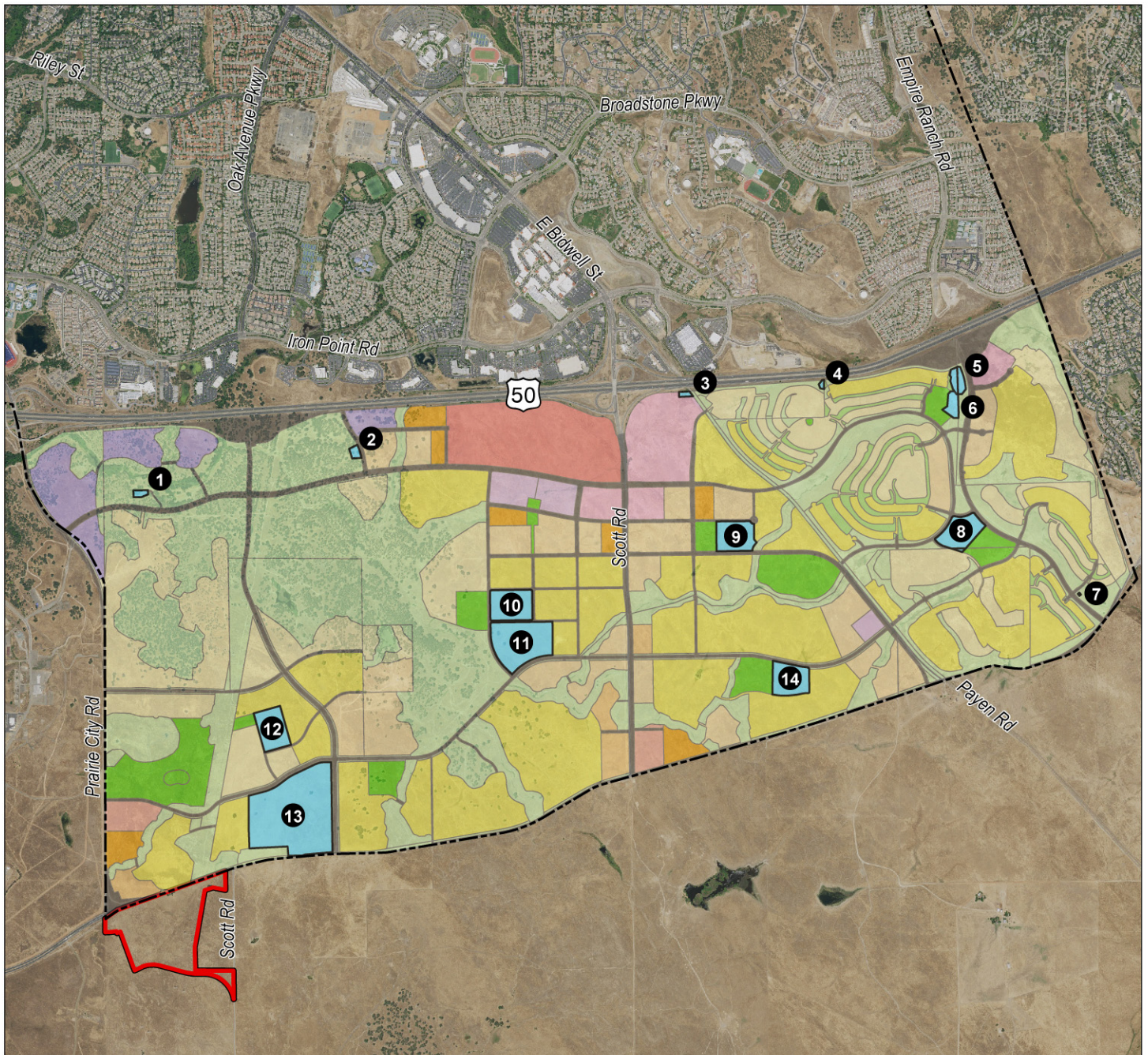
Table 5-1 PQP-Designated Parcels in the FPASP area

Site No.	Acres	Type of use
1	0.82	Wastewater Lift Station
2	1.01	Non-Potable Water Booster Pump Station
3	0.56	Potable Water Booster Pump Station
4	0.32	Potable Water Storage Tank
5	2.88	Potable Water Storage Tank, Non-Potable Water Storage Tank, Potable Water Booster Pump Station, Non-Potable Water Booster Pump Station
6	2.52	Cell Towers
7	0.05	Wastewater Lift Station
8	10.02	Elementary School
9	10.01	Elementary School
10	11.44	Elementary School
11	21.82	Middle School
12	10.03	Elementary School
13	54.68	High School
14	10.00	Elementary School
Grand Total	136.14	

The seven sites that are designated as PQP and are not school sites would not be of a sufficient size to accommodate a corporation yard use. In addition, as shown on Exhibit 5-4, the PQP sites are all located very close to land that is designated for residential use. This would not meet the project objectives of removing land use conflicts.

City staff also considered whether land not currently designated for PQP could be redesignated for a corporation yard use. Because of the mixed-use nature of the FPASP area, many of the parcels which would be large enough to accommodate a corporation yard use are too close to residentially-designated properties to be suitable for use as a corporation yard. In addition, the City Council found that approval of the FPASP with a mix of uses (that did not include a corporation yard site) would support job creation and generate public revenues. In planning the FPASP area, the City had the objective of “[g]enerat[ing] positive fiscal impacts for the City through development within the [FPASP]” (Folsom 2011).

The City entered into development agreements with all landowners once the FPASP was approved that exclude the City from developing a corporation yard within the FPASP area. Even if the City and landowners were to renegotiate those agreements, land that could be redesignated would either be too close to residential properties or would reduce land dedicated to job-generating uses or reduce land dedicated to revenue-producing uses. For these reasons, no feasible alternative site was found within the FPASP area.



Legend

Project Area	Multi-Family Medium Density	Mixed Use
Folsom City Limits	Multi-Family High Density	Open Space
Public/Quasi-Public	Industrial/Office Park	Park
Single Family	General Commercial	Open Space/Landscape
Single Family High Density	Community Commercial	Roadway
Multi-Family Low Density	Regional Commercial	

0 1,500 3,000 Feet

Source: Data provided by City of Folsom in 2018

2016 NAIP Imagery

G17010100 01 029

Exhibit 5-4

Public/Quasi-Public Land Within the Folsom Plan Area



5.3.2 Alternative Sites Located Outside the City Boundaries

The City evaluated the suitability of several locations outside of the City boundaries. Two of these sites are mapped below (Exhibits 5-5 and 5-6, Locations 4 and 5) and are located to the west of Prairie City Road and adjacent to White Rock Road.

The primary concerns identified regarding these sites include; distance to day-to-day operations, access limitations, environmental constraints, distance to utility connections, and topography. For reference, the alternative sites are approximately 1.7 miles further to the west of the Project site and approximately 7.2 miles from City Hall. This distance is significant considering the City's ability to provide timely customer service to all City residents and customers, increased vehicle operation and maintenance costs, and increased labor costs. Over the 50+ year anticipated life of the new corporation yard (which could be even longer), the increased distance places a significant lifecycle expense burden on the City. This site is also farther from existing sewer and water infrastructure and would cost significantly more to extend service to this site (Nugen, pers. comm., 2017).

Access to these sites is limited as well. The two sites are adjacent to White Rock Road; however, both sites are restricted to right-in, right-out movements which would necessitate vehicles to drive further to the west to make a U-turn at the next signal. Additionally, the existing signal to the west would need enhancements to allow larger vehicles to complete a U-turn movement. To make these sites viable, a signalized intersection would need to be constructed at a considerable expense and additional environmental impact. Because this area of White Rock Road is part of the planned future SouthEast Connector, the SouthEast Connector JPA would likely not permit adding additional signals along this section of White Rock Road. Therefore, these locations could result in potentially significant traffic safety issues.

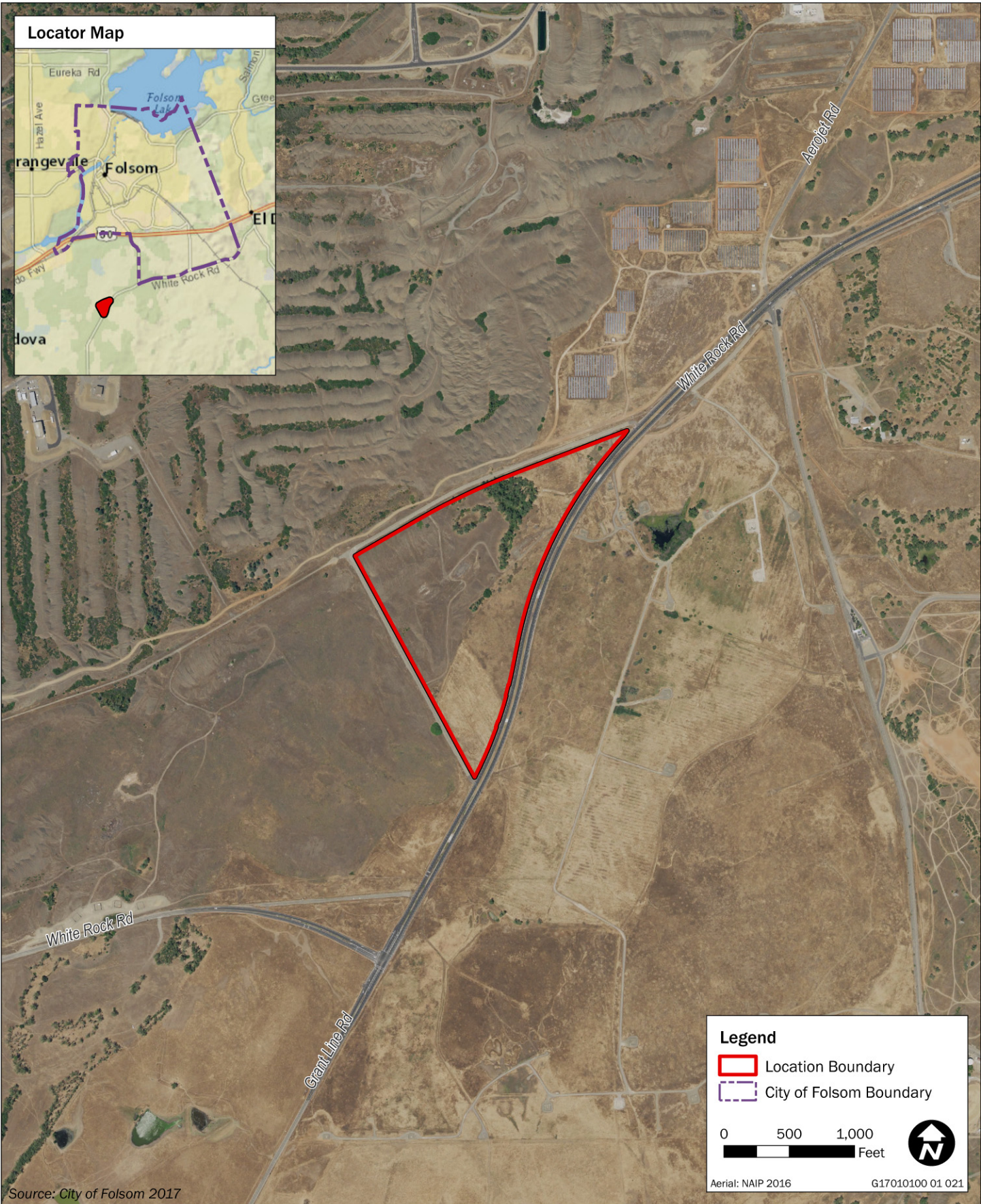
An additional concern is the topography of the sites. The northern site (Location 4) is approximately 45 acres; however, only the southerly 14.5 acres are usable without substantial grading of the parcel. There is a significant elevation difference with mine tailings on the northern side of the parcel, which would be required to be removed from the site and would result in substantial soil and rock exportation from the site. There is also a large grove of trees that would need to be removed and potentially mitigated.

The southern site is approximately 170 acres and there appears to be a very large stock pond on the northern portion of the site and several active groundwater monitoring wells on the parcel. The groundwater monitoring wells are associated with previous activities at Aerojet and could indicate the presence of contaminated soil and/or groundwater.

Given the distance away from the city limits and significant issues associated with site access, topography, environmental concerns, increased operation and maintenance expenses, as well as the overall usability of these sites and the inability of meeting the project objectives of locating the new corporation yard within the City boundaries and implementing the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, these alternative locations would not be viable alternative options for a future corporation yard and were rejected from further consideration.

The City considered selecting an area that would be within the County's Urban Services Boundary (USB) and adjacent to the City boundary (Location 6, Exhibit 5-7). As described in the Phase 1 ESA for the project site (Appendix C), Location 6 is between the city boundaries of Rancho Cordova and Folsom. Much of this area is part of the Aerojet Superfund Site and is part of a multi-year remediation effort. As such, this area is not suitable for City use and was not considered further.

Additionally, the City also considered an alternative configuration on the current project site (Exhibit 5-8). While this configuration would include a smaller footprint than the project site, it would not be contiguous with city limits, would not be consistent with LAFCo's mandate to ensure logical and orderly growth. Accordingly, this alternative would not be viable and was rejected from further consideration.



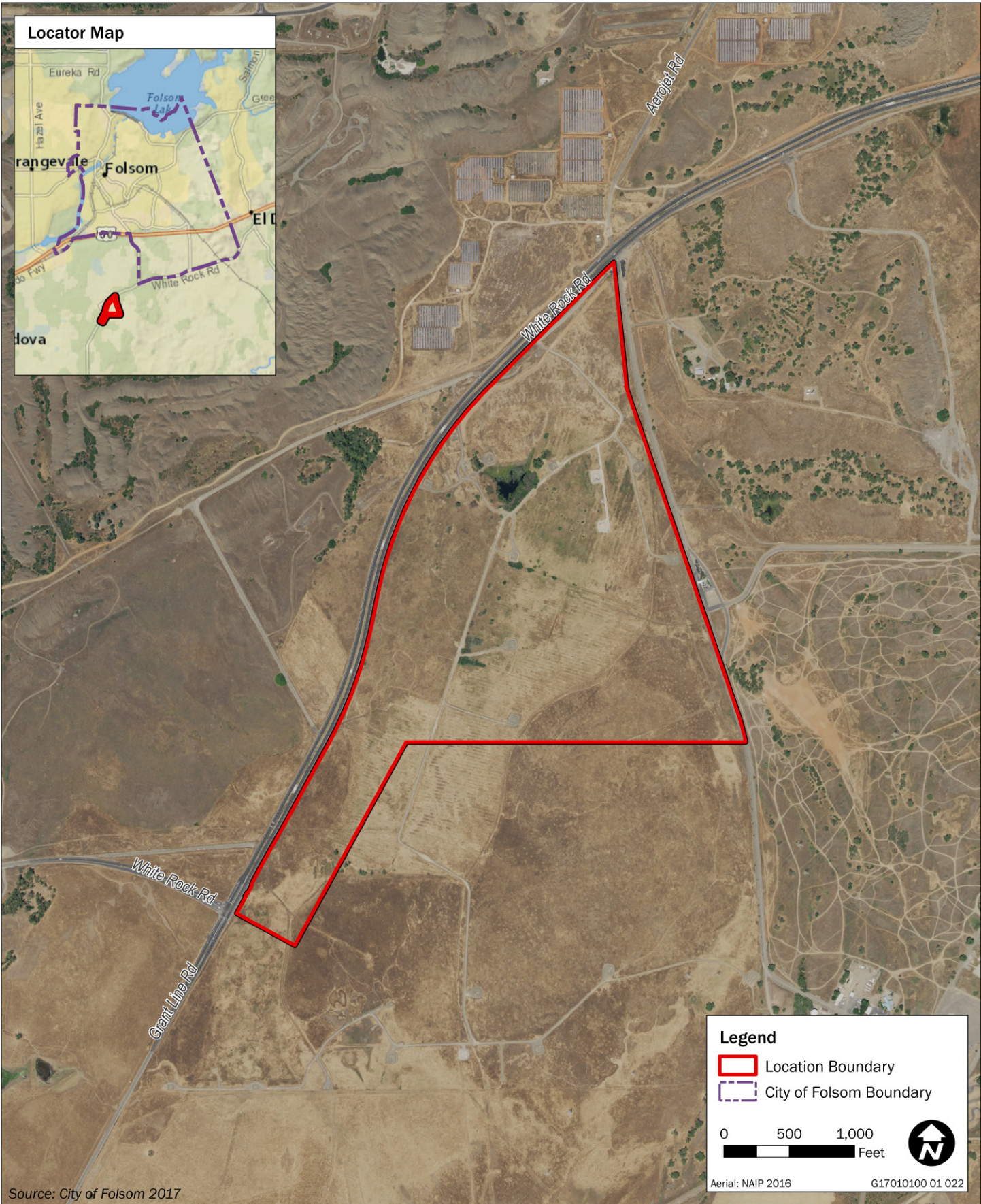
Source: City of Folsom 2017

Exhibit 5-5



Location 4




Locator Map



Legend

-  Location Boundary
-  City of Folsom Boundary

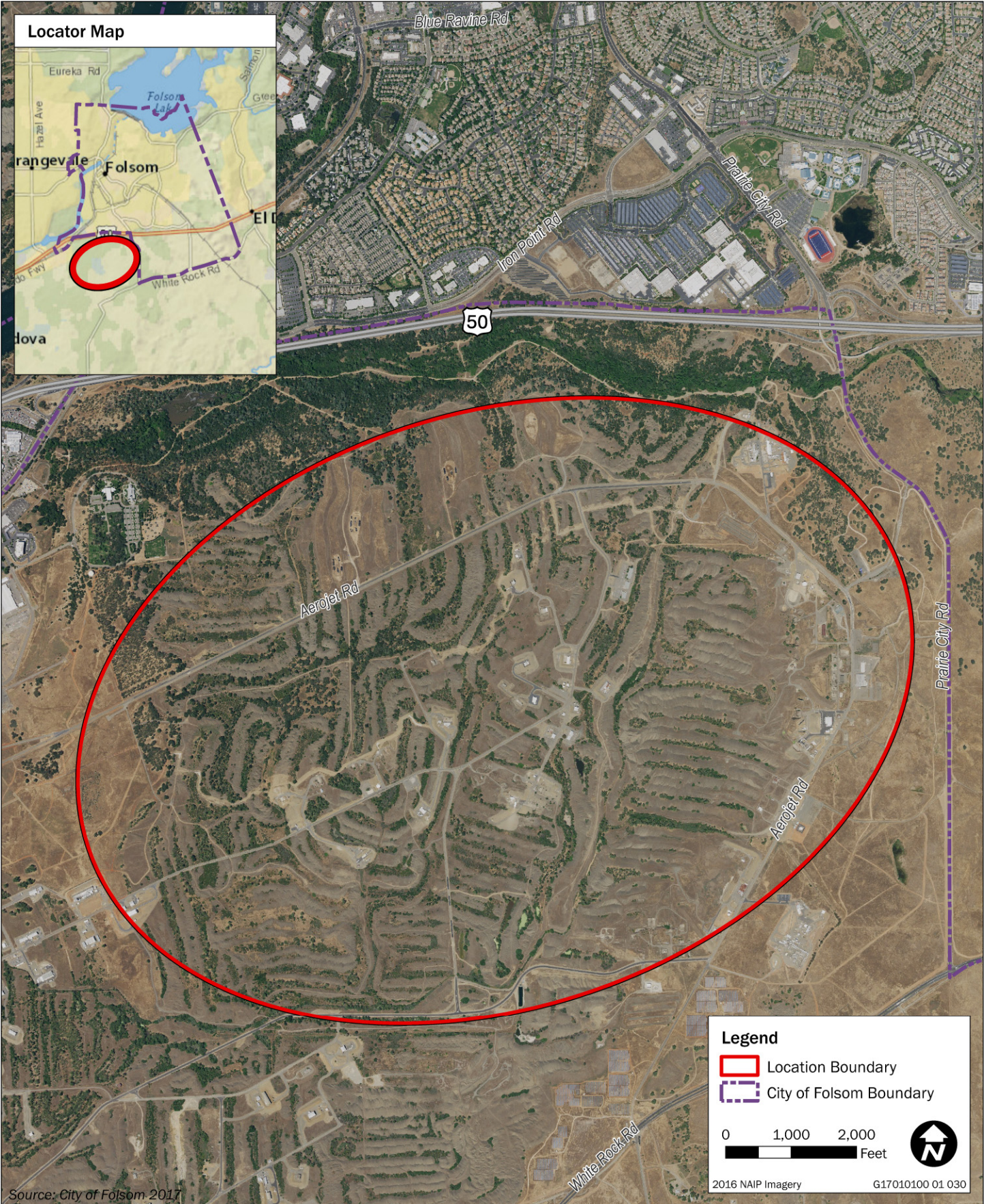
0 500 1,000
Feet





Aerial: NAIP 2016 G17010100 01 022

Source: City of Folsom 2017

Locator Map



Legend

-  Location Boundary
-  City of Folsom Boundary

0 1,000 2,000 Feet

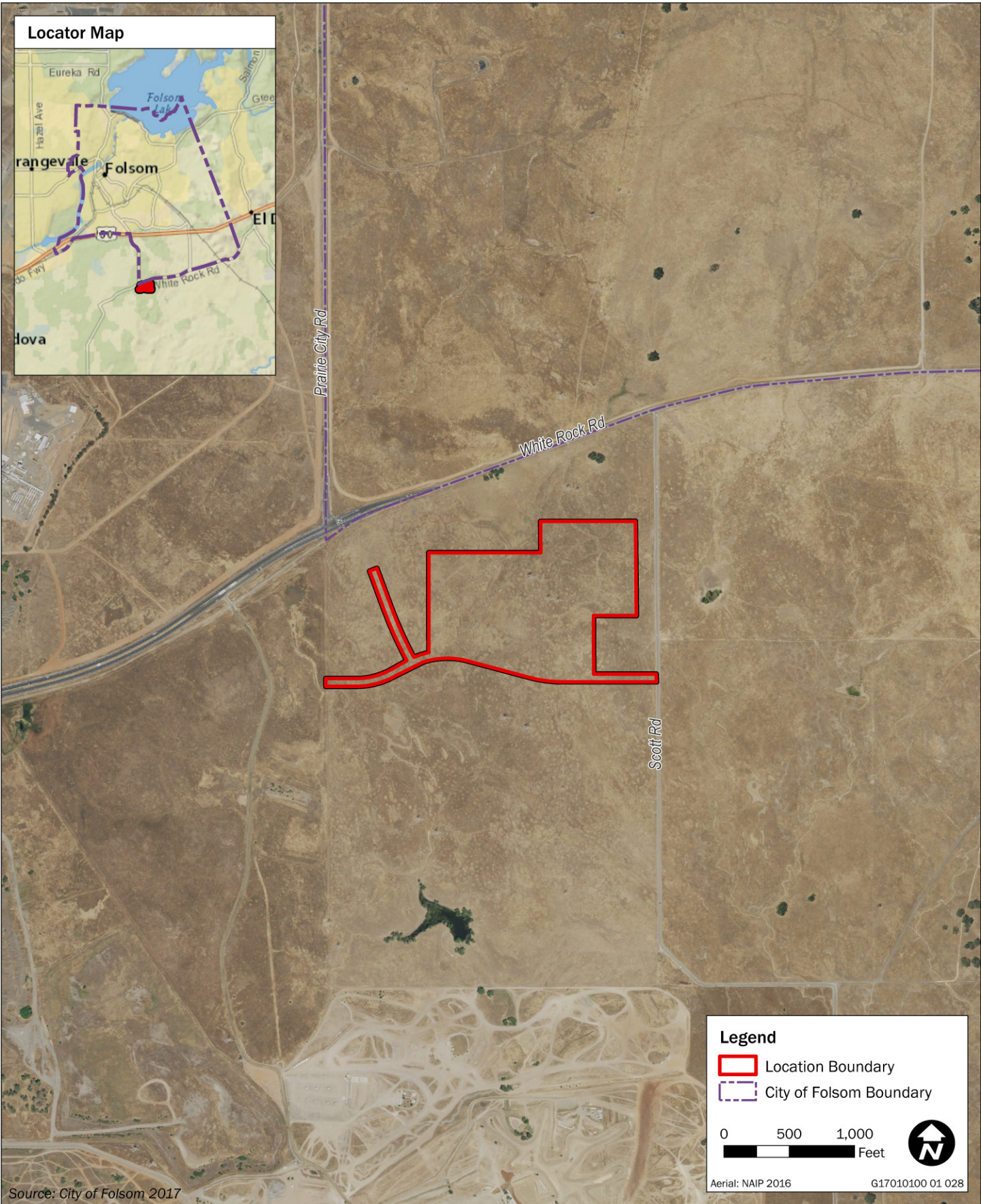


2016 NAIP Imagery

G17010100 01 030

Source: City of Folsom 2017





Source: City of Folsom 2017

5.4 EVALUATION OF ALTERNATIVES

The following alternative to the project is evaluated in detail, as described below:

- ▲ **Alternative 1: No Project** – This alternative would consist of not approving the Folsom Corporation Yard SOIA, annexation, or changes to land use/zoning designations. The SOIA/annexation area would remain under the jurisdiction of Sacramento County with no changes to the current General Agriculture 80 land use designation and Special Planning Area zoning.

Over the past 10 years, the City has engaged in a comprehensive evaluation of site options for relocation of its corporation yard including the preparation of a June 2016 memo evaluating potential sites (Nugen, pers. comm., 2016) and review of new site options since that time. As a result of that evaluation, the City has undertaken a good-faith effort at bringing forward potential feasible site options for consideration. The project has been recommended because it meets the City's objectives and based on preliminary review would result the fewer environmental impacts or constraints than other available sites. As such, the project has been evaluated throughout this EIR. In consideration of the project's significant impacts (listed above), the City again reconsidered whether there are any available options or sites that could be implemented to reduce environmental impacts while achieving some project objectives. The constraints associated with those options (Locations 1 through 5) considered have been summarized above and as described demonstrate that none of these options could feasibly meet some project objectives while at the same time reducing environmental impacts. Many of these options would result in similar land use conflicts because of the presence of nearby sensitive receptors, which is a primary driver of relocating the current corporation yard.

The only other option for the City would be to continue status quo conditions and incrementally add additional facilities and equipment to existing yard sites where it is feasible to do so. This is the current situation of the City and would be representative of a "No Project Alternative." This option is evaluated as part of Alternative 1 below. No other feasible sites or options are available or known to the City that could be implemented to achieve some of the project's objectives and reduce environmental impacts.

5.4.1 Alternative 1: No Project Alternative

Under the No Project Alternative, the proposed SOIA would not be established, the City of Folsom's General Plan would not be amended, the site would not be annexed or rezoned, and the area would remain under Sacramento County's jurisdiction. The County general plan land use designation would remain as General Agricultural 80-acre. The No Project Alternative would not meet any of the project objectives. As described in Chapter 2, *Project Description*, the Leidesdorff Yard is fully occupied and unable to support current and future service requirements. In addition, the site is poorly configured with older, inefficient structures, located adjacent to residential neighborhoods in Historic Folsom and is in close proximity to American River. Under this alternative, the City would maintain its existing operational conditions and would continue to provide services to residents and the community. Where feasible to do so, the City would incrementally add facilities and equipment within its existing yard sites in an effort to address operational needs and future growth. If available, the City could establish small satellite facilities adjacent or near existing facilities to supplement capacity for as long as feasible. However, as demonstrated through the 2008 Needs Assessment (City of Folsom 2008), the City's existing corporation yard capacity and areas surrounding these facilities is deficient and cannot meet the long-term projected demands. At the point when the City would not be able to adequately provide services, the City would need to seek other service options for its residents, the feasibility of which is currently unknown.

EVALUATION OF ENVIRONMENTAL EFFECTS

Aesthetics

The No Project Alternative would continue limited grazing uses at the site and would retain the existing visual character and lighting conditions of the area. While project impacts to the visual character and lighting/glare conditions of the area are significant and unavoidable under project and cumulative conditions, this impact would be avoided under the No Project Alternative. In addition, the No Project Alternative would not include significant and unavoidable impacts to a scenic vista in a local scenic corridor (Scott Road). The footprint of existing yard facilities would remain unchanged and the same types of activities would occur at these sites. No substantial changes to views of existing yard facilities would occur and impacts would be less-than-significant. Therefore, the aesthetic impacts of the No Project Alternative would be less.

Agriculture and Forestry Resources

The No Project Alternative would continue existing conditions at the site and no development would occur. While the project would result in the significant and unavoidable impacts under project and cumulative conditions for loss of grazing land outside the USB (per Sacramento County policy) and prime agricultural land defined by LAFCo, this alternative would not result in the conversion of any agricultural lands. The footprint of existing yard facilities would remain unchanged and no agricultural or forestry land would be altered under this alternative and impacts would be less-than-significant. Overall, the agricultural resource impacts of the No Project Alternative would be less.

Air Quality

Under the No Project Alternative, construction of a new corporation yard would not occur and, therefore, no construction-related emissions would be generated. However, the City would need to continue to expand its services to meet the demands of existing and projected future growth with the City. This expansion could come from staging additional vehicles and equipment at existing yards and/or constructing small satellite yards adjacent or near existing facilities to meet demand. As such, operational activities and associated air emissions would not be substantially different under the No Project Alternative; however, their location would be more dispersed throughout the City. Therefore, the air quality impacts of the No Project Alternative would be similar to those that would occur with the project.

Biological Resources

Under the No Project Alternative, there would be no activity within the project site. This would retain the grasslands and trees in the SOIA/annexation area that support special-status plant and wildlife species known to occur in the region. While mitigation is available to reduce some project biological resource impacts to a less-than-significant level, these impacts would be substantially reduced or avoided under the No Project Alternative. The footprint of existing yard facilities would remain unchanged and the same types of activities would occur at these sites. No significant biological resources impacts would be anticipated. Where new or expanded satellite facilities may be constructed, potential biological impacts could occur. It is anticipated that the City would implement similar mitigation as recommended for the project to reduce impacts. Therefore, the biological resource impacts of the No Project Alternative would be similar.

Cultural and Tribal Cultural Resources

Under the No Project Alternative, impacts to archaeological, historical, paleontological, and tribal cultural resources would be less under the No Project Alternative because there would be no ground disturbance of the project site related to future corporation yard development. The footprint of existing yard facilities would remain unchanged and the same types of activities would occur at these sites. No significant cultural resources impacts would be anticipated. Where new or expanded satellite facilities may be constructed, potential cultural impacts could occur. It is anticipated that the City would implement similar mitigation as recommended for the project to reduce impacts. Overall, impacts would be similar.

Energy

If the SOIA/annexation is approved, a future corporation yard would be built under the most current standards regarding energy efficiency. In addition, Mitigation Measure 3.7-1 would require the City to improve the energy efficiency of a future corporation yard through construction reductions and replacement of diesel-fueled heavy-duty vehicles with renewable natural gas or renewable diesel-fueled vehicles, replacement of gasoline-fueled passenger vehicles with electric vehicles, and installation of onsite renewable energy. Under the No Project Alternative, the existing corporation yard facilities are not built to be to the same energy efficient standards that would occur under the project and fleet vehicles would continue to burn nonrenewable fuels. Accordingly, even though the City plans to replace fleet vehicles with more energy-efficient vehicles in the future whether or not a new corporation yard is built, the project (to be built with the latest energy efficiency measures) would be more energy efficient than the No Project Alternative.

The No Project Alternative would not require the extension of offsite energy infrastructure that would result in significant and unavoidable impacts for the project. While small expansions of existing yard facilities or satellite facilities may occur under this alternative, because these areas are located in the urban core of the City it is anticipated that sufficient energy infrastructure connections would be available without the need for offsite impacts. Overall, energy impacts would be less.

Greenhouse Gas Emissions and Climate Change

Under the No Project Alternative, construction of a new corporation yard would not occur and, therefore, no construction-related GHG emissions would be generated. However, the City would need to continue to expand its services to meet the demands of existing and projected future growth with the City. This expansion could come from staging additional vehicles and equipment at existing yards and/or constructing small satellite yards to meet demand. As such, operational activities and associated GHG emissions would not be substantially different under the No Project Alternative; however, their location would be more dispersed throughout the City. Therefore, the GHG impacts of the No Project Alternative would be similar to those that would occur with the project.

Hazards and Hazardous Materials

Under the No Project Alternative, there would not be the potential to expose residents to sources of contamination from site development. While mitigation is available to reduce project hazards to a less-than-significant level, these impacts would be avoided under the No Project Alternative. Therefore, the construction-related hazards and hazardous impacts of the No Project Alternative would be less.

Hydrology and Water Quality

The No Project Alternative would avoid an increase in impervious surface area, which would increase surface water infiltration and reduce sedimentation and other pollutants in stormwater runoff. However, the No Project Alternative would also remove the City's ability to construct a modern facility with up-to-date design features meant to protect water quality and reduce runoff which would be a valuable outcome of the project. The existing Leidesdorff Yard was built in an earlier era with fewer built-in protections for water quality. The City has been diligent to meet requirements of its NPDES permit and has implemented best practices to protect water quality and prevent contaminated runoff from leaving the site. However, because this was not designed into the site when it was built, it requires constant surveillance and maintenance. The Leidesdorff site is located adjacent to the American River corridor which makes it even more imperative that the City protect water quality. The No Project Alternative would avoid an increase in impervious surface area at the project site. However, the City would not be able to retire the Leidesdorff site and would continue to operate this older facility. Overall, the hydrology and water quality impacts of the No Project Alternative would be similar.

Noise and Vibration

Continued vacancy of the SOIA/annexation area would avoid operational noise impacts that could exceed Sacramento County and City of Folsom noise standards. However, the City would need to continue to expand its services to meet the demands of existing and projected future growth with the City. This expansion could

come from staging additional vehicles and equipment at existing yards and/or constructing small satellite yards to meet demand, which could result in construction-related noise impacts. As such, operational activities and associated noise would not be substantially different under the No Project Alternative; however, their location would be more dispersed throughout the City. This could potentially cause noise impacts to additional sensitive receptors. In addition, noise generated by the activities at the existing Leidesdorff Yard has already caused issues with neighbors. The current site used to have two entrances. However, due to neighbor complaints on noise, one of these entrances was closed. Under the No Project Alternative, construction of a new corporation yard would not occur and, therefore, no construction-related noise would be generated but operational noise would continue and may expand. Therefore, the noise impacts of the No Project Alternative would be similar to those that would occur with the project.

Transportation and Circulation

The No Project Alternative would not immediately introduce new traffic to the area around the project site. However, the City would need to continue to expand its services to meet the demands of existing and projected future growth with the City. This expansion could come from staging additional vehicles and equipment at existing yards and/or constructing small satellite yards to meet demand. As such, operational activities and associated trips would not be substantially different under the No Project Alternative; however, their location would be more dispersed throughout the City. Therefore, the transportation impacts of the No Project Alternative would be similar to those that would occur with the project.

Utilities and Service Systems

Under the No Project Alternative, construction of additional utility infrastructure would not be required because the City would not need to extend utilities to the project site. However, the City would need to continue to expand its services to meet the demands of existing and projected future growth with the City. This expansion could come from staging additional vehicles and equipment at existing yards and/or constructing small satellite yards to meet demand. Presumably, sites within the City would already have nearby utilities available. Therefore, the utilities and service systems impacts of the No Project Alternative would be less than those that would occur with the project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6 states that “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” As shown in Table 5-2, below, the No Project Alternative is the environmentally superior alternative because it would avoid more of the significant impacts than would the project. However, the No Project Alternative would not meet any of the project’s objectives.

For the reasons set forth in Section 5.3, *Alternatives Dismissed from Detailed Evaluation*, above, the City concluded that there were no other feasible alternatives to the project.

Table 5-2 Comparison of Environmental Impact of Alternatives

Section		Project	No Project Alternative
3.1	Aesthetics	Significant and Unavoidable	Less
3.2	Agriculture and Forestry Resources	Significant and Unavoidable	Less
3.3	Air Quality	Less than Significant with mitigation	Similar
3.4	Biological Resources	Significant and Unavoidable	Similar
3.5	Cultural and Tribal Cultural Resources	Less than Significant with mitigation	Similar
3.6	Energy	Significant and Unavoidable	Less
3.7	Greenhouse Gas Emissions and Climate Change	Less than Significant with mitigation	Similar
3.8	Hazards and Hazardous Materials	Less than Significant with mitigation	Less
3.9	Hydrology and Water Quality	Less than Significant with mitigation	Similar
3.10	Noise and Vibration	Significant and Unavoidable	Similar
3.11	Transportation and Circulation	Less than Significant with mitigation	Similar
3.12	Utilities and Service Systems	Less than Significant with mitigation	Less