5 ALTERNATIVES

5.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f) (1) states, in part:

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

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the City of Folsom. (See PRC Sections 21081.5, 21081[a] [3].)

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basis objectives of the project (CCE Section 15126.6[a]). The primary objectives for the project are as follows:

- Ensure a buffer to maintain low- and moderate-income housing sites sufficient to meet the City's RHNA requirements;
- Implement 2021-2029 Housing Element Program H-2 to facilitate development and increase opportunities for mixed-use and multi-family high density development in the East Bidwell Mixed Use Overlay, SACOG Transit Priority Areas outside the Historic District, and the Folsom Plan Area Specific Plan Town Center;
- Establish a new Transit Oriented Development overlay designation; and
- Provide zoning and land use designations and development standards for low- and moderate-income housing sites.

5.2.2 Environmental Impacts of the City of Folsom 2035 General Plan Amendments for Increased Residential Capacity Project

Sections 3.1 through 3.11 of this draft SEIR address the environmental impacts of implementation of the proposed City of Folsom 2035 General Plan Amendments for Increased Residential Capacity Project (project). Potentially feasible alternatives were developed with consideration of avoiding or lessening the potentially significant impacts of the project, as identified in Chapter 3 of this draft SEIR. However, there were no new significant and unavoidable issue areas identified in the draft SEIR and the project would not result in a substantially more severe impact for any significant and unavoidable impacts identified in the General Plan EIR.

5.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project, and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-maker(s). (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternatives were considered by the City but are not evaluated further in this Draft SEIR.

5.3.1 Reduced Units in the 27-inch Sewer Shed

This alternative would reduce or eliminate the number of residential units in the City's 27-inch sewer shed. The reduction of units in the 27-inch sewer shed would reduce identified wastewater capacity impacts and Mitigation Measure 3.11-2b: Develop and Implement a Wastewater Conveyance Master Plan for the 27-Inch Shed would no longer be required. This alternative was rejected as it would not accommodate the City's share of the regional housing allocation established in the SACOG Regional Housing Needs Plan for the 2021–2029 planning period and would not meet Housing Element Program H-2.

5.3.2 Relocate Units in the 27-inch Sewer Shed to 33-inch Sewer Shed

This alternative would reallocate the proposed units in the City's 27-inch sewer shed to the 33-inch sewer shed to reduce identified wastewater capacity impacts in the 27-inch sewer shed. Under this alternative Mitigation Measure 3.11-2b: Develop and Implement a Wastewater Conveyance Master Plan for the 27-Inch Shed would no longer be required. This alternative was rejected as it would result in significant impacts to the City's 33-inch sewer shed that is currently near capacity and would need localized improvements under the project as proposed.

5.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in this Draft SEIR.

- Alternative 1: No Project Alternative assumes continued implementation of the City's 2035 General Plan. No changes would be made to address the requirements of State law to meet the City's Reginal Housing Needs Allocations (RHNA) for low- or moderate-income housing. The project planning area would retain the current General Plan land use and zoning designations.
- Alternative 2: Denser Development Alternative includes reducing multi-family development in the Glenn Station and Central Business districts, specifically the development within the City's 27-inch sewer shed, and instead increasing multi-family development in the College/Broadstone, Iron Point Station district and the portion of the Glenn Station district outside of the 27-inch sewer shed.
- Alternative 3: Folsom Plan Area Alternative includes focusing all the new growth needed to meet the target housing demand at all income levels for the City's RHNA in the Folsom Plan Area.

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

5.4.1 Alternative 1: No Project Alternative

Under Alternative 1, the No Project Alternative, The City would continue to implement the adopted 2035 General Plan. No changes would be made to address the requirements of State law. Since the adoption of the 2035 General Plan, the City has been issued a RHNA by the Sacramento Area Council of Governments (SACOG) and is required by State law to address its housing needs in the 2021-2029 Housing Element. The General Plan land use and zoning designations would not be updated to address the City's housing needs under this alternative. The project planning area would retain the adopted General Plan land use and zoning designations.

The No Project Alternative would result in the continuation of existing conditions and planned development of the City. No new significant environmental impacts or an increased severity of environmental impacts identified in the 2035 General Plan EIR would occur under this alternative because it would retain the current General Plan land use and zoning designations.

5.4.2 Alternative 2: Denser Development Alternative

Under the Denser Development Alternative multi-family development would be reduced in the Glenn Station and Central Business districts, specifically within in sites located in the City's 27-inch sewer shed, and increased in the College/Broadstone district, Iron Point Station district and in the portion of the Glenn Station district outside the 27-inch sewer shed. The following would occur under this alternative:

- Removal of Sites GS-2 and GS-5 from the project (reduction in 531 units)
- Site GS-1 and CC-1 would have a development capacity of 82 units and 908 units, respectively, consistent with the assumptions in the General Plan EIR (reduction of 156 units and 959 units respectively)
- Sites GS-3 and GS-4 would have increased floor area ratio (FAR) up to 3.00 and increased allowable height of two additional stories (addition of 450 units)
- Site IP-1 would have and increased FAR up to 3.00 and increased allowable height of two additional stories (addition of 374 units)
- The College/Broadstone district would have an increased FAR to 2.5, but remove Site CB-4 (1,116) which would result in an increased development capacity of 871 units and increased allowed height.

This alternative would result in denser and taller development in the College/Broadstone district, Iron Point district, and a portion of the Glenn Station district. Table 5-1 shows a summary of the total units under this alternative. Overall, the Denser Development Alternative would result in 6,095 multi-family units, which is 49 more units than proposed the project.

Table 5-1 Alternative 2 Unit Summary

Alternative 2 Site Change	Unit Change
GS-3 and GS-4	450
IP-1	374
College/Broadstone district increased FAR	871
GS-2 and GS-5	(531)
GS-1	(156)
CC-1	(959)
Total	**49**

() = negative number

AESTHETICS

As discussed in Section 3.1, "Aesthetics," of this Draft SEIR, the project would result in significant and unavoidable impacts to visual quality and views and new sources of substantial light and glare from new multi-family residential development. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. The alterative would increase the allowed height with two additional stories as compared to the project. Therefore, denser and taller development under this alternative would result in increased visual and lighting impacts. (*Greater*)

AIR QUALITY

As discussed in Section 3.2, "Air Quality," of this Draft SEIR, the project would result in less than significant impacts from construction emissions and local mobile source carbon monoxide emissions and significant and unavoidable impacts for operational emissions, odors, and toxic air contaminants. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. As more units would be developed under this alternative, construction and operational emissions would be greater. Additionally, denser development could result in greater odors, mobile carbon monoxide emissions, and potential toxic air contaminant exposure at nearby receptors. Therefore, impacts would be greater for Alternative 2 than under the project. (*Greater*)

CULTURAL AND TRIBAL CULTURAL RESOURCES

As discussed in Section 3.3, "Cultural and Tribal Cultural Resources," of this Draft SEIR, the project would result in significant and unavoidable impacts to archaeological, historic, and tribal cultural resources and less than significant impacts to human remains. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas . Because there would be fewer sites developed with denser development earthmoving activities for Alternative 2 would be reduced, which could result in less disturbance, destruction, or alteration of known or as-yet-undiscovered/unrecorded archaeological resources, tribal cultural resources, or human remains. Additionally, fewer developed sites could reduce impacts to potential historic age structures. Therefore, the impacts under this alternative would be less than those under the project. (*Less*)

ENERGY

As discussed in Section 3.4, "Energy," of this Draft SEIR, the project would result in less than significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. This alternative would have greater energy demands than the project because there would be 49 additional units proposed under Alternative 2. Therefore, Alternative 2 would result in greater energy impacts. (*Greater*)

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As discussed in Section 3.5, "Greenhouse Gas Emissions," of this Draft SEIR, the project would result in significant and unavoidable impacts related to GHGs and climate change. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. Therefore, construction and operation-related GHG emissions would be more efficient than the project due to denser development. Because Alternative 2 would result in denser development in a different location as the project GHG impacts would be slightly less than the project. (*Less*)

LAND USE AND PLANNING

As discussed in Section 3.6, "Land Use and Planning," of this Draft SEIR, the project would not result in significant impacts related to land use conflicts. As with the project, future projects under the Denser Development Alternative would be required to comply with General Plan, FPASP, and City Municipal Code requirements that address environmental effects from development. Further, the Denser Development Alternative would provide the 49 additional residential units as compared to the project to meet the requirements of state law intended to help the

City meet its share of the RHNA. Therefore, there would be a larger RHNA buffer under this alternative. Land use and planning impacts associated with this alternative would be similar to those under the project. (*Similar*)

NOISE

As discussed in Section 3.7, "Noise," of this Draft SEIR, the project would not result in significant impacts related to construction noise or vibration and long term noise exposure. However, traffic noise impacts were determined to be significant and unavoidable. Future development under the Denser Development Alternative could prolong noise generated during construction and result in different construction methods due to denser development and increased heights. For example, constructing a taller multi-family residential building could require a pile diver to make piles deep enough to support a larger structure. However, development under this alternative would be required to adhere to project Mitigation Measures 3.7-1 Implement Noise-Reducing Construction Practices, Prepare and Implement a Noise Control Plan, and Monitor and Record Construction Noise Near Sensitive Receptors, 3.7-2 Develop and Implement a Vibration Damage Control Plan, and 3.7-4 Heating, Ventilation, and Cooling Noise. However, under this alternative denser development and increase in 49 units would result in greater construction noise and vibration and long-term noise exposure. Additionally, increased development would result in more traffic and traffic related noise. Development under this alternative would result in greater noise impacts from increased and denser development. (*Greater*)

POPULATION AND HOUSING

As discussed in Section 3.8, "Population and Housing," of this Draft SEIR, the project would not result in significant impacts related to population growth. Under Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. The 49 additional units would result in slightly greater population growth as compared to the project. However, this alternative would provide a greater buffer for the City's RHNA. Therefore, population growth impacts would be slightly greater to the project and consistent with the City's adopted 2021-2029 Housing Element. (*Greater*)

PUBLIC SERVICES AND RECREATION

As discussed in Section 3.9, "Public Services and Recreation," of this Draft SEIR, the project would generate additional residents, which would increase the need for additional fire protection and law enforcement services and additional parks. However, these services are funded through a variety of sources (e.g., property taxes, development impact fees, fees for services) and are expanded as needed to accommodate additional population growth. For parks, City Municipal Code Chapter 16.32 and Chapter 4.10 require future developments to dedicate land or pay an in-lieu fee for the development of neighborhood and community parks. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. Therefore, impacts to public services and recreation would be greater as a result of the additional units under this alternative. However, development would be required to pay the same fees for fire protection and law enforcement services and adhere to the City Municipal Code for development of parks. Because this alternative would result in additional units, which would have the potential to result in additional residents as compared to the project, impacts would be greater. (*Greater*)

TRANSPORTATION

As discussed in Section 3.10, "Transportation," of this Draft SEIR, the project would result in less than significant impacts related to VMT. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the

project, resulting in increased multi-family development in these areas. Intensified multi-family development around the light rail stations would further reduce VMT. Therefore, impacts would be less to the project. (*Less*)

UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.11, "Utilities and Service Systems," of this Draft SEIR, the project would result in less than significant impacts to water supply, dry utilities, and solid waste. Although wastewater conveyance and treatment impacts would be less than significant the project would result impacts to the wastewater system north of Highway 50 and Mitigation Measures 3.11-2a and 3.11-2b would be required to ensure adequate capacity in the City 27-inch and 33-inch sewer sheds. Under the Denser Development Alternative, approximately 1,695 units would be shifted to the College/Broadstone, Iron Point Station and Glenn Station districts with an additional 49 units as compared to the project, resulting in increased multi-family development in these areas. Therefore, development beyond what was analyzed in the General Plan EIR would not occur in the 27-inch sewer shed and Mitigation Measures 3.11-2b would no longer be required. However, increasing multi-family development in Iron Point Station district and the portion of the Glenn Station district outside of the 27-unch sewer shed would likely shift some of the housing units to the 33-inch sewer shed, resulting in more units in the 33-inch sewer shed as compared to the project. Implementation of Mitigation Measure 3.11-2a would be required for this alternative to improve localized sewer infrastructure in the 33-inch sewer shed. An increase of 49 multi-family units under this alternative would result in slightly greater water supply, dry utilities, and solid waste impacts than the project. There would be capacity to serve the slight increase in units under this alternative. However, because City 27-inch sewer shed would no longer be impacted this alternative would have reduced impacts as compared to the project. (*Less*)

5.4.3 Alternative 3: Folsom Plan Area Alternative

Under the Folsom Plan Area Alternative all development proposed for the project needed to meet the target housing demand for the City's RHNA would be in the Folsom Plan Area. The Folsom Plan Area Alternative would include all proposed 6,046 additional multi-family residential units south of Highway 50 in the Folsom Plan Area. To achieve additional residential development in the Folsom Plan Area this alternative would allow for increased building height of two additional stories, higher density, and greater FAR on sites designated as part of the project in the FPASP for development. Therefore, overall development under this alternative would be denser and taller than currently permitted in the Folsom Plan Area.

AESTHETICS

As discussed in Section 3.1, "Aesthetics," of this Draft SEIR, the project would result in significant and unavoidable impacts to visual quality and views and new sources of substantial light and glare from new multi-family residential development. Under this alternative all new multi-family development would be located in the Folsom Plan Area. Therefore, although impacts to existing visual character and light and glare north of Highway 50 would be reduced. This alternative would allow for increased building height with two additional stories compared what is currently allowed in the Folsom Plan Area, which would result in denser and taller development south of Highway 50. Denser and taller development would result in increased visual and lighting impacts. Therefore, these impacts would be greater for Alternative 3 than under the project. (*Greater*)

AIR QUALITY

As discussed in Section 3.2, "Air Quality," of this Draft SEIR, the project would result in less than significant impacts from construction emissions and local mobile source carbon monoxide emissions and significant and unavoidable impacts for operational emissions, odors, and toxic air contaminants. Under this alternative all multi-family development would be located in the Folsom Plan Area. As the same number of units would be developed under this alternative, construction and operational emissions would be similar. However, concentration of development in the Folsom Plan Area could result in greater odors, mobile carbon monoxide emissions, and potential toxic air

contaminant exposure at nearby receptors. Therefore, these impacts would be greater for Alternative 3 than under the project. (*Greater*)

CULTURAL AND TRIBAL RESOURCES

As discussed in Section 3.3, "Cultural and Tribal Cultural Resources," of this Draft SEIR, the project would result in significant and unavoidable impacts to archaeological, historic, and tribal cultural resources and less than significant impacts to human remains. For this alternative, all of the additional 6,046 multi-family development units would be located in the Folsom Plan Area, which would reduce the potential of impacting historic-age buildings. Under this alternative there would l be less ground disturbance north of Highway 50. However, earthmoving activities for Alternative 3 south of Highway 50 would be increased with denser development, which could result in the disturbance, destruction, or alteration of known or as-yet-undiscovered/unrecorded archaeological resources, tribal cultural resources, or human remains. Although the Folsom Plan Area Alternative would reduce the intensity of operations north of Highway 50, site disturbance would be similar as the project because greater site disturbance would occur south of Highway 50 in the Folsom Plan Area. Therefore, the overall impacts under this alternative would be similar to those under the project. (*Similar*)

ENERGY

As discussed in Section 3.4, "Energy," of this Draft SEIR, the project would result in less than significant environmental impacts related to wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct plans for renewable energy or energy efficiency. Under this alternative all new multi-family development proposed as part of the project would be located in the Folsom Plan Area. The Folsom Plan Area Alternative would have similar energy demands as the project because the same number of units are proposed under this alternative. Therefore, Alternative 3 would also not result in significant energy impacts. Energy impacts under this alternative would be similar as the project. (*Similar*)

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As discussed in Section 3.5, "Greenhouse Gas Emissions," of this Draft SEIR, the project would result in significant and unavoidable impacts related to GHGs and climate change. Under this alternative all new multi-family development proposed as part of the project would be located in the Folsom Plan Area and the same number of units would be developed as the project. Therefore, similar construction-related GHG emissions would be generated than under the Folsom Plan Area Alternative. However, because there are less public transit services and not light rail station in the Folsom Plan Area, this alternative would result in greater transit related GHG emissions due to increased VMT during operation. Therefore, the Folsom Plan Area Alternative would result in the greater GHG impacts as compared to the project. (*Greater*)

LAND USE AND PLANNING

As discussed in Section 3.6, "Land Use and Planning," of this Draft SEIR, the project would not result in significant impacts related to land use conflicts. As with the project, future development under the Folsom Plan Area Alternative would be required to comply with General Plan, FPASP, and City Municipal Code requirements that address environmental effects from development. Further, the project and the Folsom Plan Area Alternative would provide the same amount of residential development to meet the requirements of state law intended to help the City meet its share of the RHNA as the project. Land use and planning impacts associated with this alternative would be similar to those under the project. (*Similar*)

NOISE

As discussed in Section 3.7, "Noise," of this Draft SEIR, the project would not result in significant impacts related to construction noise or vibration and long-term noise exposure. However, traffic noise impacts were determined to be significant and unavoidable. Future development under the Folsom Plan Area Alternative could prolong noise generated during construction and result in different construction methods due to denser development and increased heights. For example, constructing a taller multi-family residential building could require a pile driver to make piles deep enough to support a larger structure. However, development under this alternative would be required to adhere to project Mitigation Measures 3.7-1 Implement Noise-Reducing Construction Practices, Prepare and Implement a Noise Control Plan, and Monitor and Record Construction Noise Near Sensitive Receptors, 3.7-2 Develop and Implement a Vibration Damage Control Plan, and 3.7-4 Heating, Ventilation, and Cooling Noise. However, under this alternative all new multi-family development proposed as part of the project would be located in the Folsom Plan Area. Denser development in the Folsom Plan Area would result in greater construction noise and vibration and long-term noise exposure. Additionally, denser development would result in increased vehicle trips and traffic related noise in the Folsom Plan Area as compared to the project. Development under this alternative would result in greater noise impacts from intensified development south of Highway 50. (*Greater*)

POPULATION AND HOUSING

As discussed in Section 3.8, "Population and Housing," of this Draft SEIR, the project would not result in significant impacts related to population growth. The Folsom Plan Area Alternative would result in the same number of residential units, and thus population growth as under the project. However, this alternative would result in higher population growth in the Folson Plan Area than under the project, exceeding the maximum number of residential units established in the FPASP. Although this increased population growth would be consistent with the regional growth projections for the City, this alternative would concentrate affordable housing development in Folsom Plan Area. The population growth impacts would be slightly greater to the project. (*Slightly Greater*)

PUBLIC SERVICES AND RECREATION

As discussed in Section 3.9, "Public Services and Recreation," of this Draft SEIR, the project would generate additional residents, which would increase the need for additional fire protection and law enforcement services and additional parks. However, these services are funded through a variety of sources (e.g., property taxes, development impact fees, fees for services) and are expanded as needed to accommodate additional population growth. For parks, City Municipal Code Chapter 16.32 and Chapter 4.10 require future developments to dedicate land or pay an in-lieu fee for the development of neighborhood and community parks. Under this alternative all new multi-family development proposed as part of the project would be located in the Folsom Plan Area. Therefore, impacts to public services and recreation would be increased south of Highway 50 as all development would be concentrated in the Folsom Plan Area. However, development would be required to pay the same fees for fire protection and law enforcement services and adhere to the City Municipal Code for development of parks. Because this alternative would result in the development of the same number of residences as anticipated by the project, impacts would be similar as the project. (*Similar*)

TRANSPORTATION

As discussed in Section 3.10, "Transportation," of this Draft SEIR, the project would result in less than significant impacts related to VMT. Under this alternative the same number of multi-family units proposed as part of the project would be located in the Folsom Plan Area. Because there are less public transit services, less job centers and no light rail stations in the Folsom Plan Area, the alternative would result in increased VMT as compared to the project. Therefore, development under this alternative would increase VMT due to reduced transit and job opportunities. Impacts would be greater than the project. (*Greater*)

UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.11, "Utilities and Service Systems," of this Draft SEIR, the project would result in less than significant impacts to water supply, dry utilities, and solid waste. Although wastewater conveyance and treatment impacts would be less than significant, the project would result in impacts to the wastewater system north of Highway 50 and Mitigation Measures 3.11-2a and 3.11-2b would be required to ensure adequate capacity in the City 27-inch and 33-inch sewer sheds. Under this alternative all multi-family development proposed as part of the project would be located in the Folsom Plan Area. Therefore, this alternative would no longer impact the City 27-inch and 33-inch sewer sheds and Mitigation Measures 3.11-2a and 3.11-2b would not be required. However, this alternative would increase the allowed maximum development of approximately 11,461 residential units in the Folsom Plan Area by 6,046 units. As discussed in Section 3.11, the Wastewater Master Plan Update for the FPASP indicated that the wastewater collection and conveyance facilities for the Folsom Plan Area was based on the total contributing amount of 15,554 equivalent single-family dwelling units, which would be 4,093 units more than what was permitted in the FPASP (11,461 units). Implementation of this alternative would exceed the wastewater collection and conveyance capacity analyzed in the Wastewater Maste Plan Update, which would result in greater wastewater impacts than the project in the Folsom Plan Area.

Regarding water supply, the water supply available to the Folsom Plan Area is restricted by a Water Supply Agreement. The Water Supply Agreement limits the water supply to the Folsom Plan Area to not exceed 5,600 acre-feet per year (AFY). As discussed in Section 3.11, it was estimated that implementation of the FPASP would result in a water demand of approximately 4,821.47 AFY. Therefore, the anticipated water demand for the FPASP would not exceed the 5,600-AFY water supply and there would be approximately 778.53 AFY of water surplus. Implementation of this alternative would result in the development of 6,046 units in the Folsom Plan Area. Utilizing the future water demand factor of 0.22 AFY/dwelling unit (see Table 3.11-8), this alternative would result in water demand of approximately 1,330 AFY in the Folsom Plan Area. The 1,330 AFY water demand would exceed the 778,53 AFY of water surplus under the Water Supply Agreement. This alternative would result in greater water supply impacts than the project in the Folsom Plan Area.

As discussed in Section 3.11, a Technical Dry Utilities Study was prepared for the Folsom Plan Area and concluded that all the major dry utilities (natural gas, electric, telephone, and cable television) necessary to serve the FPASP either already exist on-site or are available adjacent to the site. Furthermore, as discussed in Section 3.11.2, "Environmental Setting," SMUD, PG&E, and AT&T and Comcast Communication have planned to construct additional electricity, natural gas, and telecommunication infrastructure to serve the Folsom Plan Area. Future development under this alternative would be required to comply with General Plan Policies PFS 8.1.1 through PFS 8.1.5 to ensure that adequate utilities services would be provided to the City's residents. It is reasonable to assume that this alternative would not result in a substantial increase in demand for dry utilities compared to what was planned for the Folsom Plan Area. The same number of multi-family units are proposed in the Folsom Plan Area dry utilities and solid waste impacts would be similar to the project.

Based on the discussion above, this alternative would result in greater impacts related to wastewater and water supply in the Folsom Plan Area as compared to the project and would result in similar impacts related to dry utilities and solid waste as compared to the project. Development under this alternative would result in greater utilities and service systems impacts from intensified development on the Folsom Plan Area (*Greater*).

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project Alternative (described above in Section 5.4.1) would avoid all adverse impacts resulting from implementation of the City of Folsom 2035 General Plan Amendments for Increased Residential Capacity Project analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project Alternative would not meet the objectives of the project as presented above in Section 5.2.1.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives

evaluated. As illustrated in Table 5-2, the Alternative 2: Denser Development Alternative would be environmentally superior action alternative. Although Alternative 2 would not avoid significant and unavoidable impacts associated with the project, this alternative would result in lesser impacts related to cultural and tribal cultural resources, GHG emission, transportation, and utilities and service systems. It should be noted that the findings for the proposed project in Table 5-2 are based on the findings of the General Plan EIR. The project as proposed would not result in increased or new impacts as those identified in the General Plan EIR.

Table 5-2 Summary of Environmental Effects of the Alternatives Relative to the 2035 General Plan Amendments for Increased Residential Capacity Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Denser Development Alternative	Alternative 3: Folsom Plan Area Alternative
Aesthetics	Significant and Unavoidable	Less	Greater	Greater
Air Quality	Significant and Unavoidable	Less	Greater	Greater
Cultural and Tribal Cultural Resources	Significant and Unavoidable	Less	Less	Similar
Energy	Less than Significant	Less	Greater	Similar
Greenhouse Gas Emissions and Climate Change	Significant and Unavoidable	Less	Less	Greater
Land Use and Planning	Less than Significant	Less	Similar	Similar
Noise	Significant and Unavoidable	Less	Greater	Greater
Population and Housing	Less than Significant	Less	Greater	Slightly Greater
Public Services	Less than Significant	Less	Greater	Similar
Transportation	Less than Significant	Less	Less	Greater
Utilities and Service Systems	Less than Significant (with mitigation)	Less	Less	Greater

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