

7 PROJECT ALTERNATIVES

7.1 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 California Department of General Services (DGS). (See PRC Sections 21081.5, 21081[a] [3].)

7.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

7.2.1 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 (CCR Section 15126.6[a]). Chapter 3, "Project Description," articulates the following project objectives:

- ▲ consolidate State office space and address State office space deficiencies in downtown Sacramento, prioritizing building on underutilized state property;
- ▲ accommodate staff from State-owned office buildings targeted for renovation or replacement (such as the Resources Building at 1416 9th Street) to vacate such building(s) and facilitate the eventual renovation and re-occupation while minimizing the number of disruptive moves for state agencies;
- ▲ provide a modern, efficient, and safe environment for State employees and the public they serve;
- ▲ integrate the new State development with the existing neighborhood;
- ▲ develop a sustainable and energy-efficient building;
- ▲ encourage and support the use of alternative commute modes by designing the project to have easy access to multiple transit modes (e.g., bus, light rail);
- ▲ design a building that is respectful of the existing historic Heilbron House or relocate the Heilbron House to an appropriate location; and
- ▲ maximize the effectiveness of the design-build project delivery method by maintaining sufficient flexibility in the performance criteria to support innovation in the design competition.

7.2.2 Environmental Impacts of the Resources Building Replacement Project

Sections 4.2 through 4.15 of this DEIR address the environmental impacts of implementation of the proposed Resources Building Replacement Project. Potentially feasible alternatives were developed with the objective of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 4 of this DEIR and summarized below. If an environmental issue area analyzed in this DEIR is not addressed below, it is because no significant impacts were identified for that issue area. Three significant and unavoidable environmental impacts of the project were identified. First, because it cannot be assured that nighttime construction can be avoided, and if needed, that applicable noise standards can be met, construction noise impacts are considered significant and unavoidable. Second, construction of the new office building next to the Historic Heilbron House is also considered a significant and unavoidable impact on historic architectural resources. Finally, an unavoidable outcome of higher density urban development with high rise buildings is increased periods of shadow at ground level locations; this impact is significant and unavoidable.

- ▲ **Utilities and Infrastructure:** The existing water delivery infrastructure at P Street Block includes two water mains that could be insufficient to supply water to the proposed building. Mitigation Measure 4.5-2 requires a water study to identify the best location for new service connections for water and fire flow as

well as necessary improvements to the water supply system to adequately serve the project and meet applicable requirements. With preparation of the water study and implementation of any identified infrastructure improvements in accordance with Mitigation Measure 4.5-2, the impact on water supply infrastructure capacity would be reduced to a **less-than-significant** level. Although PG&E has confirmed that the existing natural gas supply would be sufficient to serve the new office building, the infrastructure adjacent to the project site would be inadequate for providing a medium pressure service connection for the new office building. Mitigation Measure 4.5-7 requires coordination with PG&E and construction of new natural gas infrastructure that meets the project's need for a medium pressure natural gas service connection, which would reduce this impact to a **less-than-significant** level.

- ▲ **Air Quality:** During project construction, emissions of criteria pollutants would not exceed applicable thresholds except for oxides of nitrogen (NO_x). Mitigation Measure 4.6-1 requires implementation of various actions to reduce emissions from construction equipment, resulting in a sufficient limitation of NO_x emissions to reduce this impact to a **less-than-significant** level.
- ▲ **Noise:** During project construction, sufficient noise and groundborne vibration would be generated to exceed applicable thresholds. Mitigation Measures 4.8-1a and 4.8-1b would minimize construction noise at nearby sensitive noise receptors; however, because it cannot be assured at this time that nighttime construction will not be needed, and if needed that applicable noise standards can be met, this impact would be **significant and unavoidable**. Mitigation Measures 4.8-2a and 4.8-2b require study, monitoring, and adjustments to construction methods to limit construction-generated groundborne vibration to levels that do not exceed identified thresholds to prevent damage to nearby buildings and substantial human disturbance. Implementation of these measures would reduce this impact to a **less-than-significant** level. The truck loading dock for the new office building may be accessed from 7th Street on the west side of the P Street Block in close proximity to noise-sensitive receptors (i.e., Capitol Towers Apartments) where people normally sleep; however, the exact location of this feature has yet to be determined. Thus, it is possible that noise generated by trucks at the loading dock could expose off-site noise-sensitive receptors to noise levels that could result in sleep disturbance. Mitigation Measure 4.8-4 would require that the loading dock and delivery area be oriented, located, and designed in such a way that noise exposure at nearby sensitive receptors would comply with City of Sacramento interior noise standards for existing sensitive receptors, or that loading dock activity would not be permitted during nighttime hours (10:00 p.m. to 7:00 a.m.); thus, reducing this impact to a **less-than-significant** level.
- ▲ **Cultural and Tribal Cultural Resources:** Much of the project site has been disturbed during past development, reducing the potential for sub-surface cultural resources to be present. However, contact with previously undisturbed native soils during construction could result in damage or destruction of currently unrecorded subsurface historic and pre-historic archeological resources, tribal cultural resources, and human remains. Such contact would be most likely during excavation of the basement for the proposed office building. Mitigation Measures 4.12-1, 4.12-2, and 4.12-3 collectively require the presence of archeological and Native American monitors where undisturbed, or minimally disturbed native soils are encountered; stopping work in the vicinity of any area where evidence of historic or pre-historic archeological resources, tribal cultural resources, or human remains are encountered; properly evaluating, documenting, and protecting any finds; and transferring any archeological material or remains removed from the site to an appropriate organization or individual. Implementation of these measures would reduce this impact to a **less-than-significant** level.

Physical alteration of the immediate surroundings of the Heilbron House at 704 O Street would cause a substantial adverse change in the significance of historic architectural resources. This would result in a significant impact on the environment as described in State CEQA Guideline 15064.5(b)(1). This impact would be **significant and unavoidable**.

- ▲ **Biological Resources:** The project could result in the direct loss or temporary disturbance of trees protected under the City of Sacramento Tree Preservation Ordinance. Implementation of Mitigation Measure 4.13-1 would reduce impacts associated with tree removal to a **less-than-significant** level by providing replacement trees and complying with the City's Tree Preservation Ordinance.

- ▲ **Aesthetics, Light, and Glare:** The solar panels that could be located on the south building façade could produce glare that would shine into north facing windows of office buildings to the south and southeast, including OB8, OB9, and the Gregory Bateson Building. Therefore, the proposed project could introduce new sources of light and glare that would adversely affect daytime views of adjacent uses. As required by Mitigation Measure 4.15-3, DGS will prevent exposure of adjacent office buildings to daytime glare by designing and constructing the solar array on the south building façade, if applicable, in such a manner that the panels do not reflect sunlight into north facing windows of the office buildings immediately south and southeast of the project site. This will reduce the significant glare impact to a **less-than-significant** level. The proposed office building would be a maximum of 300-feet tall, which would cast shadows over Capitol Tower residences during the morning hours in winter, consistent with other mid- to high-rise buildings in the project vicinity. Shadows generated by the project would not fall on any particular shadow-sensitive areas for a substantial portion of the day during summer, fall, and spring months. However, during some winter months, a relatively small area of the eastern portion of the Capitol Tower super-block, across from the intersection of 7th and O Streets, would be shadowed by the proposed building during the morning hours. There is no feasible mitigation to reduce the overall area of the shadow and also meet the project objectives. An unavoidable outcome of higher density urban development with high rise buildings is increased periods of shadow at ground level locations. This impact is **significant and unavoidable**.

7.3 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 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.

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 DGS but are not evaluated further in this DEIR.

7.3.1 Demolition of the Heilbron House

This alternative considered recordation and demolition of the historic Heilbron House, allowing use of the entire P Street Block for construction of the proposed Resources Building Replacement Project. Under such a scenario, the new building could achieve the State's square footage objectives with a larger footprint and reduced height. Approximately 20 California State Parks employees currently work at the Heilbron House either full time, part time, or occasionally between field duties and would require permanent relocation. However, DGS received 165 comment letters and oral comments at the scoping meeting regarding preservation of the historic Heilbron House. Comments overwhelmingly expressed support for retaining the

Heilbron House and opposed demolition. In response to these concerns, DGS dismissed this option from further consideration and this alternative is not evaluated in detail in this EIR.

7.3.2 Alternative Location

This alternative considered construction of a new building on an alternative site in the downtown area. While this alternative could avoid impacts of building next to the Heilbron House, the remainder of the block is surface parking, meaning that no buildings need to be demolished for construction of a new office building on the P Street Block. Even assuming an alternative site is unoccupied, a fundamental goal of the project as proposed is to achieve the highest and best use of State-owned property. The State's CAP, CAP Implementation Plan, and 2015 CAP Progress Report identify the State-owned P Street Block as "office" and identify the block for a large State office building. In addition, DGS completed an update to the Sacramento Region State Office Planning Study that identified the P Street Block as a superior State-owned site for new development because of its proximity to the State Capitol, other government agencies, public transit, and other services and because it is an underutilized infill site (DGS 2017). An alternative location may not be near transit; therefore, an alternative location may not allow the State to achieve the objective of encouraging and supporting the use of alternative transportation through easy access to multiple transit modes (e.g., bus, light rail). Furthermore, an alternative location may require greater demolition if there are onsite structures, and may not be in as close proximity to other State and local agency offices and the State Capitol. For these reasons, this alternative is not evaluated in detail in this EIR.

7.3.3 Multiple Basement Levels

The proposed project includes a single below-grade basement level. This alternative would provide one or more additional basement levels. This approach would increase the total interior square footage of the building, or allow for a smaller above-ground building while maintaining the total square footage assumed for the proposed project. However, as identified in Section 4.9, "Geology and Soils," depth to groundwater in the downtown Sacramento area varies seasonally and groundwater can be less than 10 feet below the ground surface. Data collected as part of geotechnical studies at the project site showed groundwater at a depth of approximately 12 to 15 feet below the ground surface. A second or third basement level would require deep excavation and groundwater would be encountered, requiring dewatering, special engineering techniques to minimize groundwater intrusion into the lower basement levels, and continuous collection and pumping of groundwater away from the basement levels. Additional basement levels would substantially increase construction costs and require ongoing monitoring, maintenance, and costs to pump groundwater away from the lower basement levels as part of ongoing building operations. Project objectives can be achieved without the complexities associated with additional basement levels. This alternative would not preclude any significant impacts, and could result in greater environmental effects, such as a higher potential of encountering previously undisturbed native soils that could contain historic or prehistoric archeological resources. For these reasons, this alternative is not evaluated in detail in this EIR.

7.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives evaluated in this DEIR.

- ▲ **Alternative 1: No Project–No Development Alternative** assumes no demolition of the existing surface parking lot, no new building on the P Street Block and no child-care facilities on the rooftop plaza of the Subterranean Building. The project site would remain in its current condition.
- ▲ **Alternative 2: Relocate the Heilbron House Alternative** assumes project elements and features that are generally the same as the proposed project. However, the Heilbron House would be relocated from the P

Street Block to next to the Stanford Mansion, which would allow the new office building to occupy the entire P Street Block.

- ▲ **Alternative 3: Capitol Area Plan Alternative** assumes project elements and features that are the same as the proposed project; however, the office building would be consistent with the office building planned in the Capitol Area Plan (CAP) Implementation Program: an office building of approximately 628,000 GSF, net square footage of approximately 471,000, approximately 18 floors, approximately 5,000 to 8,000 square feet of commercial space, and 355 parking spaces. As with the proposed project and as identified in the CAP Implementation Program, the Heilbron House would remain in its current location.
- ▲ **Alternative 4: Child Care at OB 8/9 Alternative** assumes project elements and features that are the same as the proposed project. However, child care would be located at OB 8/9 on the block just south of the P Street Block rather than on the rooftop plaza of the Subterranean Building.

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

7.4.1 Alternative 1: No Project–No Development Alternative

Under Alternative 1, the No Project–No Development Alternative, no action would be taken by DGS and the project site would remain unchanged from current conditions. The surface parking lot on the P Street Block would remain in its current condition and the Heilbron House would remain in place and continue to be managed and used by California State Parks. No child-care facilities would be placed on the rooftop plaza of the Subterranean Building. Although the State’s CAP, CAP Implementation Plan, and 2015 CAP Progress Report identify the P Street Block for office, this alternative assumes that no development would occur and the project site would remain in its current state. If the Resources Building were to be vacated to support some future renovation, the existing Resources Building staff would be relocated to a currently unidentified building or buildings. The No Project–No Development Alternative would not meet the project objectives, but as required by CEQA, is evaluated in this DEIR.

Although it is acknowledged that with the No Project–No Development Alternative, there would be no discretionary action by the State, and thus no impact, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as “impacts” that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

LAND USE

The No Project–No Development Alternative would not be consistent with the objectives of the CAP because it would not meet the State offices objective to provide office space and related services to meet present and future space requirements for the State of California near the State Capitol. In addition, the No Project–No Development Alternative would not support the Sacramento Region Blueprint, 2016 MTS/SCS, City of Sacramento 2035 General Plan, and Central City Community Plan, which like the State’s CAP, call for infill development in downtown Sacramento, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating jobs closer to housing. This alternative would not address State office space deficiencies in downtown Sacramento, increase use of underutilized state property, develop an energy-efficient office building near transit lines, or allow for relocation of State employees from other downtown buildings that are in need of renovation or replacement (such as the Resources Building at 1416 9th Street). In comparison, the proposed project would be consistent with the objectives and purposes of the CAP, the 2015 CAP Progress Report, Governor Brown’s 2016 Five-Year Infrastructure Plan, and with local land use plans. Replacement of the P Street Block surface parking with a new State office building and placement of modular child-care structures on the roof plaza of the Subterranean Building would not result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an

environmental effect. Therefore, impacts of the No Project–No Development Alternative would be **greater** than those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

The No Project–No Development Alternative would not generate any new residents, jobs, or homes in the City of Sacramento. In comparison, the proposed project would allow space for an increase of approximately 1,200 new State employees, approximately 100 employees for retail and commercial elements, and up to 590 temporary construction jobs during peak construction periods; however, the project-related increase in employment would not induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region. Because the project would not result in significant population, employment, or housing impacts, the No Project–No Development Alternative would not avoid any such impacts. However, because the No Project–No Development Alternative would generate no new residents, jobs, or homes in Sacramento, it would result in **less** population, employment, and housing impacts than the proposed project.

TRANSPORTATION AND CIRCULATION

The No Project–No Development Alternative would not include any new development and would not generate any new traffic-related impacts. In comparison, the proposed project would add a small number of new trips to the roadway network in the vicinity, but would not cause degradation of LOS. The project would result in small increases in freeway off-ramp queues, and transit, bicycle, and pedestrian trips, but existing facilities are more than adequate to accommodate the small increases. Construction of the project would temporarily disrupt traffic in the vicinity of the project site, potentially through lane closures, lane narrowing, and detours, and these localized and temporary impacts would be minimized through implementation of a Construction Traffic Management Plan in accordance with City of Sacramento Code. All transportation and circulation impacts would be less than significant. Because the project would not result in significant transportation impacts, the No Project–No Development Alternative would not avoid any such impacts. However, because it would result in no impact, it would result in transportation and circulation impacts that are **less** than the proposed project.

UTILITIES AND INFRASTRUCTURE

The No Project–No Development Alternative would not result in additional demand for water, wastewater treatment, stormwater conveyance, electricity, or natural gas; nor would it result in the need for new facilities and infrastructure to support additional demand. By comparison, the proposed project would result in significant impacts associated with water conveyance and natural gas lines. However, these impacts would be reduced to less-than-significant levels with mitigation. Because the proposed project would not result in significant utilities impacts after mitigation, the No Project–No Development Alternative would not avoid any significant impacts. However, because the No Project–No Development Alternative would have no new demand for potable water, stormwater/surface-runoff management, wastewater treatment, and wastewater-conveyance infrastructure, it would result in **less** of an impact than the proposed project. However, the No Project–No Development Alternative also precludes payment by the State of the City's Combined Sewer Development Fee, which would assist in funding wastewater conveyance improvements in the project area.

AIR QUALITY

Because the No Project–No Development Alternative would involve no construction disturbances, new facilities, or new vehicular trip generation, this alternative would not generate new construction- or operations-related air emissions. By comparison, the proposed project would result in a significant impact related to construction emissions of NO_x. After mitigation, this impact would be reduced to less-than-significant levels. Implementation of the No Project–No Development Alternative would not result in this air-quality impact; therefore, this alternative would result in **less** of an impact than the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Because the No Project–No Development Alternative would involve no construction disturbances, new facilities, or new vehicular trip generation, this alternative would not generate new construction- or operations-related greenhouse gas (GHG) emissions. By comparison, the project would result in construction and operational GHG emissions; however, these emissions would be less than significant because both construction and operation of the proposed office building would include GHG efficiency measures (e.g., proximity to transit, solar power generation, Zero Net Energy) consistent with State and local policies and regulations for the purpose of reducing GHG emissions and enabling achievement of the statewide reduction targets. However, because the No Project–No Development Alternative would not result any new GHG emissions, this alternative would result in **less** of an impact than the proposed project with regard to climate change. However, the No Project–No Development Alternative also precludes the benefits of consolidating State employees in a new highly energy-efficient and GHG-emissions-efficient building and supporting renovation of the Resources Building, which would be expected to increase the energy efficiency of that building and reduce its GHG emissions.

NOISE

Under the No Project–No Development Alternative no new construction activities would occur, no new noise-generating land uses would be developed, and no additional traffic would be generated. Therefore, there would be no increase in the potential noise conflicts under the No Project-No Development Alternative. By comparison, the proposed project would result in significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration levels and operation-related long term noise. Implementation of the No Project–No Development Alternative would avoid these noise impacts; therefore, this alternative would result in **less** of an impact than the proposed project with regard to noise.

GEOLOGY AND SOILS

The No Project–No Development Alternative would not involve any ground disturbance. There would be no potential for increased erosion or increased risk from seismic or soils hazards. Although the proposed project would demolish the existing surface parking and construct a new office building, it would not generate the potential for substantial soil erosion and would result in less-than-significant impacts related to seismic hazards, liquefaction, and expansive soils. Because of developed site conditions and required building standards, neither the proposed project nor the No Project–No Development Alternative would result in significant impacts related to geology and soils. However, because the proposed project would result in ground disturbance and excavation to construct the project, geology and soils impacts of the No Project–No Development Alternative would be **less** than those of the proposed project.

HYDROLOGY AND WATER QUALITY

Under the No Project–No Development Alternative, there would be no potential for construction-related releases of sediment and contaminants into surface waters or groundwater, and no changes in water demand, stormwater generation, drainage patterns, or flood risk. In comparison, the project site is already developed with an office building and surface parking lot, and placing the proposed development on these sites would result in no impact, or a less-than-significant impact related to hydrology and water quality issues. Various stormwater pollution prevention devices and best management practices (BMPs) would be implemented, and the project would be required to comply with existing State and local regulations regarding the City's combined storm sewer (CSS) and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Furthermore, rainwater would be collected, treated, stored, and used in the new office building, reducing stormwater runoff from the project site. Neither the project nor the No Project-No Development Alternative would result in significant impacts related to hydrology and water quality. However, because construction of the proposed project would result in ground disturbance,

excavation, and would likely encounter groundwater, hydrology and water quality impacts of the No Project–No Development Alternative would be **less** than those of the proposed project.

HAZARDS AND HAZARDOUS MATERIALS

Under the No Project–No Development Alternative, no new facilities that use hazardous materials would be located on the project site and no new workers or visitors would have the potential to be exposed to new or existing sources of hazardous materials. Removal of the parking lot pavement, excavation and construction activities associated with the project could result in the exposure of construction workers and the public to hazardous materials. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent the project from resulting in a significant risk to construction workers or the public. Construction and operation of the project would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Although the proposed project would not result in any significant impacts related to hazardous materials and public health, the No Project–No Development Alternative results no disturbance of existing hazardous materials or use of hazardous materials. Therefore, the No Project–No Development Alternative would result in **less** of an impact than the proposed project with regard to hazards and hazardous materials.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The No Project–No Development Alternative would not require any building demolition or construction activities, thereby avoiding impacts related to the disturbance, destruction, or alteration of any known or as-yet-undiscovered/unrecorded pre-historic or historic archeological resources, tribal cultural resources, human remains, or historic architectural resources. In comparison, the proposed project would result in ground disturbance and development of new structures that could cause potentially significant impacts related to disturbance of undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. However, these impacts would be reduced to less-than-significant levels after mitigation. The proposed project would result in construction of a large office building next to the Heilbron House, which is considered in this DEIR to qualify as a historic resource under CEQA. Mitigation Measures 4.12-4, 4.12-5 and 4.12-6 would reduce the impact to the degree feasible, but would not reduce it to a less-than-significant level. This impact would be significant and unavoidable. Because the No Project–No Development Alternative does not include any new development, ground disturbance, or building demolition, it has a lesser potential to result in the disturbance of as-yet undiscovered subsurface archaeological resources and/or human remains and would not adversely affect historic structures. Overall, cultural resources impacts under the No Project–No Development Alternative would be **less** than the proposed project.

BIOLOGICAL RESOURCES

The No Project–No Development Alternative would not include any development and would thus not disturb any existing on-site biological resources. However, the project site is currently developed with urban uses and lacks sensitive species or their habitat. The only potential project impact would be removal or disturbance of street trees, which would be replaced, resulting in a less-than-significant impact. Although the project site is a developed urban location and the proposed project would not result in any significant biological resources impacts after mitigation, the No Project–No Development Alternative would avoid the disturbance of street trees. Therefore, the No Project–No Development Alternative would result in **less** of an impact than the proposed project with regard to biological resources.

PUBLIC SERVICES

The No Project–No Development Alternative would not generate increased demands for fire, police, solid waste disposal, or parks and recreation or school facilities. By contrast, the proposed project would create

minor increases in demand for fire, police, solid waste disposal, and parks and recreation facilities, primarily by increasing the net number of employees in the downtown area. However, increased demands for public services would be less than significant. Because the project would result in less-than-significant impacts on public services, the No Project–No Development Alternative would not reduce or avoid any significant impacts related to this environmental issue area. However, implementation of the proposed project would create an incremental increase in service demand that would not occur under the No Project–No Development Alternative. Therefore, the No Project–No Development Alternative would result in **less** of an impact than the proposed project with regard to public services.

AESTHETICS, LIGHT, AND GLARE

Under the No Project–No Development Alternative, no new development would occur. There would be no alteration of the visual character of the project site; views of the area from surrounding vantage points would not change; and no new sources of light, glare, or shadow would be created. In comparison, the proposed project would result in a new office building up to 20 stories tall where there is currently surface parking. However, the proposed project is located on a developed urban site surrounded by a mix of low-rise, mid-rise, and high-rise buildings and the project would comply with design objectives and guidelines, as well as the City's Central City Urban Design Guidelines to the greatest degree possible, which are designed to avoid degradation in visual character of the Central City area. Because the proposed project would be a qualifying infill project as defined by SB 743 (Public Resources Code Section 21099[d][1]), aesthetic impacts would not be considered significant effects on the environment significant despite the considerable and inherent visual impact of the high-rise building. In addition, the potential for glare from the new building would be mitigated to less than significant through design. However, shadows cast by the proposed office building would be an unmitigable significant and unavoidable impact. The No Project–No Development Alternative would avoid all aesthetic impacts, including the significant and unavoidable shadow impact and mitigable glare impacts related to the proposed office building. Therefore, the No Project–No Development Alternative would result in **less** of an impact than the proposed project with regard to visual impacts.

7.4.2 Alternative 2: Relocate the Heilbron House Alternative

Alternative 2, the Relocate the Heilbron House Alternative, is the same as the proposed project in all respects except for the treatment of the Heilbron House. Under this alternative, the Heilbron House would be moved from its location at the corner of 7th and O Streets to a site just east of the Stanford Mansion at 800 N Street (Exhibit 7-1). The new site would be at the southwest corner of the intersection of 9th Street and N Street, on the existing Resources Building courtyard where bike lockers are currently housed. The courtyard east of, and associated with, the Stanford Mansion would not be affected.

Because the Heilbron House would need to be moved prior to completion of the new building on the P Street Block, the house would arrive at the new site while staff still occupied the existing Resources Building. During this period, before the new building was completed, the existing bike lockers outside the Resources Building would be placed in a tighter configuration, and some moved to other locations on the Resources Building grounds, so that there would be no loss of available bike lockers.

To move the Heilbron House, it would need to be dismantled into two or more segments. Each segment would be moved to the new site, and the house would be reconstructed at the new location. The house would be repaired and restored in a manner consistent with Secretary of the Interior standards for the treatment of historic buildings. Utility connections would be restored to support its continued use by State Parks employees. Key features of the existing Heilbron House grounds, such as the surrounding fence, would be moved with the house, and landscaping would be provided at the new location.

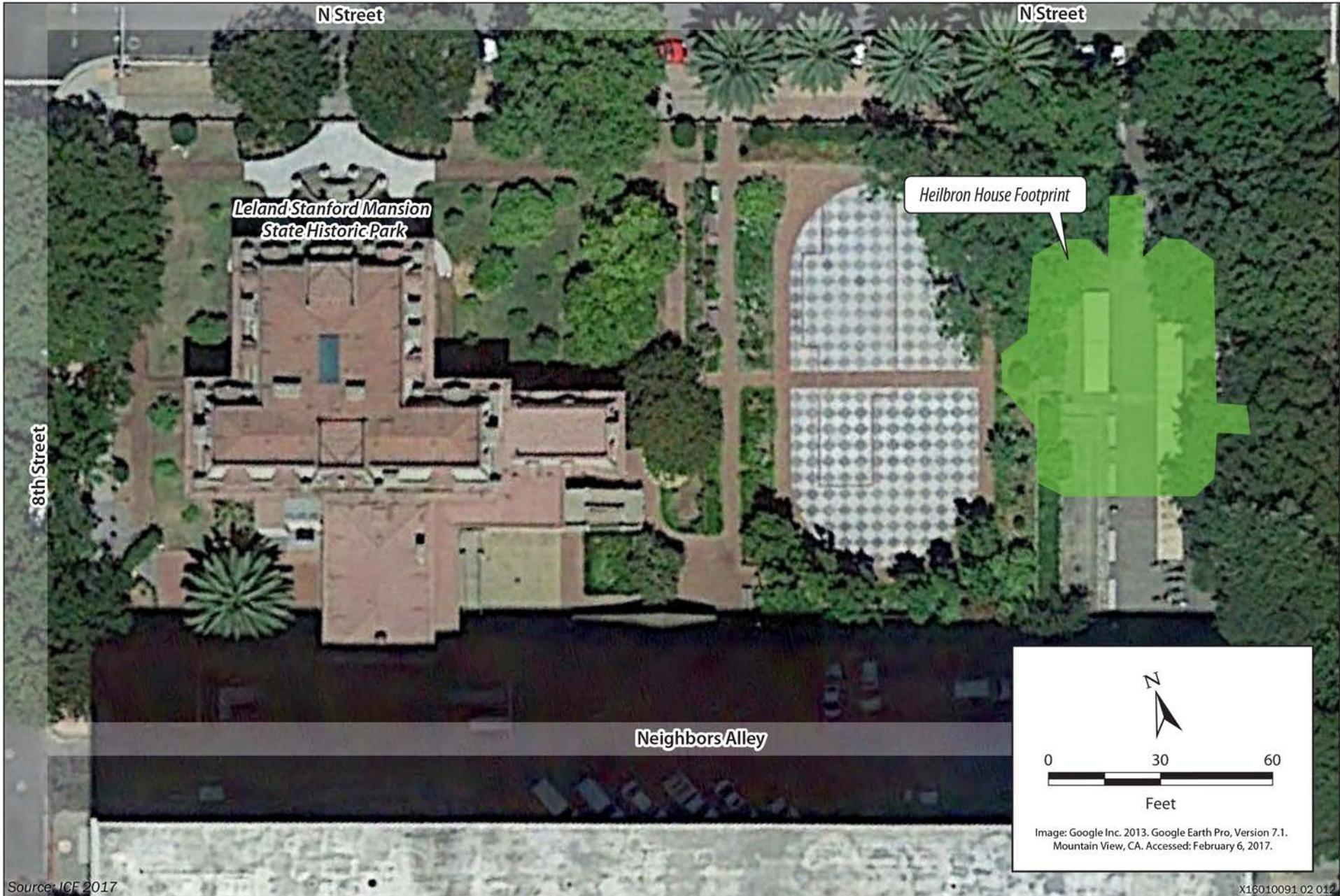


Exhibit 7-1

Heilbron House Relocation



Moving the Heilbron House, even in segments, would require temporarily disconnecting the Regional Transit light rail cables on O Street for several hours at a time on multiple days. Because of the large size of the house, overhead traffic lights along the transport route would need to be temporarily removed and trees may need to be trimmed. Traffic controls would be required along the route while pieces of the house are transported.

Removal of the Heilbron House from the P Street Block would allow the entire block to be used for the new office building; therefore, the footprint of the building would be anticipated to be larger, accommodating the needed square footage in a shorter building with fewer stories.

LAND USE

Like the proposed project, Alternative 2 would construct an office building on the P Street Block and would place child-care facilities on the roof plaza of the Subterranean Building. As with the proposed project, Alternative 2 would be consistent with the objectives of the CAP to provide office space and related services to meet present and future space requirements for the State of California near the State Capitol. In addition, Alternative 2 would support the Sacramento Region Blueprint, 2016 MTS/SCS, City of Sacramento 2035 General Plan, and Central City Community Plan, which like the State's CAP, call for infill development in downtown Sacramento, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating jobs closer to housing. Further, like the proposed project, Alternative 2 would consolidate and address State office space deficiencies in downtown Sacramento, increase use of underutilized state property, develop an energy-efficient office building near transit lines, or allow for relocation of State employees from other downtown buildings that are in need of renovation or replacement (such as the Resources Building).

Relocation of the Heilbron House in Alternative 2 would not alter existing or proposed land uses. The Heilbron House would be relocated to State-owned property next to the Stanford Mansion, which is designated as "other existing use" in the CAP. The house would remain in use as a State office building for State Parks. Neither the proposed project nor Alternative 2 would result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts of Alternative 2 would be **similar** to those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

Like the proposed project, Alternative 2 would not result in development of any new homes or generation of new residents. Both the proposed project and Alternative 2 would allow space for an increase of approximately 1,200 new State employees, approximately 100 employees for retail and commercial elements, and up to 590 temporary construction jobs during peak construction periods; however, the project-related increase in employment would not induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region. Alternative 2 would result in **similar** impacts on population, employment, and housing compared to the proposed project.

TRANSPORTATION AND CIRCULATION

Consistent with the proposed project, Alternative 2 would construct an office building on the P Street Block and would place child-care facilities on the roof plaza of the Subterranean Building. The vehicular access points under Alternative 2 would remain the same as the proposed project. The capacity of the office building and the child care would also be the same as the proposed project. Therefore, as with the proposed project, Alternative 2 would add a small number of new trips to the roadway network in the vicinity, but would not cause degradation of LOS. Both would result in small operational increases in freeway off-ramp queues, and transit, bicycle, and pedestrian trips, but existing facilities are more than adequate to accommodate the small increases.

Although the relocation of the Heilbron House would result in negligible changes in vehicular trips downtown, this element of Alternative 2 would result in greater temporary construction-related impacts. Similar to the proposed project, Alternative 2 would temporarily disrupt traffic in the vicinity of the project site, potentially through lane closures, lane narrowing, and detours, and these localized and temporary impacts would be minimized through implementation of a Construction Traffic Management Plan in accordance with City of Sacramento Code. However, Alternative 2 would require temporary disconnection of the Regional Transit Light Rail lines on O Street to move the Heilbron House. This disruption of transit services would be considered a significant temporary impact. Because the project would not result in significant transportation impacts, Alternative 2 would not avoid any such impacts, but rather would increase temporary disruption to transit services, which would not occur under the proposed project. Therefore, Alternative 2 would result in **greater** transportation and circulation impacts than the proposed project.

UTILITIES AND INFRASTRUCTURE

Alternative 2 would include an office building of the same size as the proposed project, child care for 60-70 children on the Subterranean Building, and the relocated Heilbron House would continue to operate as an office for State Parks adjacent to the Stanford Mansion. Alternative 2 would therefore result in the same demand for water, wastewater treatment, electricity, and natural gas as the proposed project, even if the demand is generated at different locations. Although the footprint of the office building could be greater with the Heilbron House moved from the P Street Block, impervious surfaces would be similar to the proposed project; therefore, stormwater runoff and demand for stormwater conveyance capacity would be the same. The proposed project would result in significant impacts associated with wastewater conveyance and natural gas infrastructure. However, these impacts would be reduced to less-than-significant levels with mitigation. Similar impacts and need for mitigation would occur under the Alternative 2. Therefore, Alternative 2 would result in **similar** utility and infrastructure impacts to those of the proposed project.

AIR QUALITY

Like the proposed project, Alternative 2 would include demolition surface parking, construction of a new office building, and installation of child-care facilities on the roof of the Subterranean Building, which would generate significant but mitigable construction-related air emissions. However, Alternative 2 would also relocate the Heilbron House, which would result in an associated increase in construction-related air emissions. After mitigation, this impact would be reduced to less-than-significant levels under both the proposed project and Alternative 2. Operations- and transportation-related air emissions would be the same as the proposed project because the number of employees would be the same, as would the size and location of the office building and child care. The relocation of the Heilbron House approximately one block away would result in a negligible change in vehicle trips related to the approximately 20 State Parks employees that work in the house. Furthermore, like the proposed project, Alternative 2 would be served by transit and would provide bicycle parking, showers, and lockers consistent with the proposed project. Therefore, Alternative 2 would result in **similar** air-quality impacts to the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Like the proposed project, Alternative 2 would include demolition surface parking, construction of a new office building, and installation of child-care facilities on the roof of the Subterranean Building, which would generate less-than-significant construction- and operations-related GHG emissions. The relocation of the Heilbron House would result in an associated increase in construction-related GHG emissions, but the impact would remain less significant. Both the proposed project and Alternative 2 would result in less-than-significant GHG impacts; therefore, Alternative 2 would result in **similar** construction- and operational-GHG emissions to the proposed project.

NOISE

Like the proposed project, Alternative 2 would include demolition of surface parking and construction of a new office building on the P Street Block, and installation of child-care facilities on the roof of the Subterranean Building. Alternative 2 would increase temporary construction-related noise because of relocation of the Heilbron House. However, because Alternative 2 would locate an office building and child-care facility of the same size/capacity on the same project site, and because operation of the Heilbron House in the new location would not generate significant operational noise, Alternative 2 would result in similar significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration impacts and noise impacts from building operation. The overall construction and operational noise impacts of the Alternative 2 would be **similar** to the noise impacts of the proposed project.

GEOLOGY AND SOILS

Alternative 2 would require similar excavation of soils as the proposed project, with a minor increase because of relocation of the Heilbron House, resulting in similar less-than-significant construction-related erosion impacts. The potential increase in the risk of exposure to injury or property damage because of a seismic event would be the same for Alternative 2 as the proposed project. Because of the same existing site conditions for the office building, and required compliance with building standards, neither the proposed project nor Alternative 2 would result in significant impacts related to geology and soils. Therefore, Alternative 2 and the proposed project would have **similar** impacts related to geology and soils.

HYDROLOGY AND WATER QUALITY

Alternative 2 would require similar excavation of soils during construction, with a minor increase due to relocation of the Heilbron House, resulting in a similar potential for construction-related releases of sediment and contaminants into surface waters or groundwater in comparison to the proposed project. Alternative 2 would result in a new office building and related features similar to the proposed project. Because the project site and the proposed site for relocation of the Heilbron House are already developed with impervious surfaces, long-term changes to runoff and water quality resulting from the project are considered less than significant for both the proposed project and Alternative 2. Similarly, various stormwater pollution prevention devices and BMPs would be implemented, and like the project, the Alternative 2 would be required to comply with existing State and local regulations regarding the City's CSS and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Alternative 2, like the proposed project, would not result in any significant impacts related to hydrology and water quality. Therefore, Alternative 2 would result in **similar** impacts to the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

Like the proposed project, demolition, excavation and construction activities associated with Alternative 2 could result in the exposure of construction workers and the public to hazardous materials. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent a significant risk to construction workers or the public under either the project or Alternative 2. Construction and operation of either the proposed project or the Alternative 2 would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Because neither the project nor the Alternative 2 would result in any significant impacts related to hazardous materials and public health, Alternative 2 would have **similar** impacts as the proposed project with regard to hazardous materials and public health.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 2 would require similar excavation of soils during construction, which would result in similar ground disturbance to the project and similar potential to disturb undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. However, relocating the Heilbron House next to the Stanford Mansion would have a potential effect on those two historical resources and on a third, the existing Resources Building. Moving the Heilbron House has the potential to result in a significant effect under CEQA because “relocation” of the building away from its historic site, “physical demolition” of its foundation and exterior staircases, or “alteration of the resource or its immediate surroundings” could all result in a “substantial adverse change in the significance” of the historical resource. The relocation would result in a loss of integrity of location, which would affect the historical association with the residential lot of August Heilbron and his family. If moved safely, the relocation would not result in an important loss of integrity of the design or workmanship of the building, because the important architectural features of the building would be retained. In addition, the physical demolition of the foundation and exterior staircases before relocation, and their subsequent alteration or restoration would not be an important loss of integrity of design, materials and workmanship, because the staircases are not original, and the brick foundation is not architecturally distinctive. Further, there would not be an important loss of integrity of setting, because there are no other buildings on the P Street Block from the period of significance, and the landscape was changed to accommodate past use of the building as a restaurant and bank. Important site characteristics would be maintained after relocation, including the setback from the street, compass orientation, compatibility of scale, use, and age of the immediate neighborhood, compatible landscape design and elements, the perimeter wrought iron fence and gate, lot size, and a corner lot or double width lot that maintains the visibility to the two primary elevations.

After relocation, the Heilbron House would no longer possess integrity of location, a new foundation would be constructed, and major repairs would be needed to reassemble the Heilbron House to its current appearance. As shown in Exhibit 7-1, the move would also change the immediate surroundings of the Stanford Mansion and, to avoid disturbance of a non-historic checkerboard plaza used for ceremonies and receptions, would cause the removal of some non-historic bicycle lockers at the Resources Building entrance plaza. Based on the shadow analysis (see Section 4.15, “Aesthetics, Light, and Glare,” Exhibit 4.15-12), the Heilbron House at the proposed relocation site next to the Stanford Mansion would be in the shadow of the existing Resources Building, in the mid-day and afternoon in the spring, fall and winter months.

An amendment to the National Register nomination would be prepared, and submitted to SHPO and NPS for review and approval. If the Heilbron House remains listed on the National Register following the move and repair, under the special considerations of the CRHR for moved buildings, it would retain its status as being automatically listed on the CRHR. However, there would still be significant shade and shadow effects on the Heilbron House, cast by the existing high rise Resources Building. This impact would be significant and unavoidable.

Under both the proposed project or Alternative 2, there would be significant an unavoidable shadow impacts and either impacts to the change in the immediate surroundings of the Heilbron House (under the proposed project) or impacts because of the loss of integrity of location (under Alternative 2). Therefore, Alternative 2 is would not avoid the project’s significant and unavoidable impact to this historic resource. Alternative 2 would result in **similar** cultural resource impacts to the proposed project.

BIOLOGICAL RESOURCES

Alternative 2 would develop the same project site with the same above-ground structures as the proposed project. Relocation of the Heilbron House would result in disturbance next to the Stanford Mansion, but like the project site, it is currently developed with urban uses and lacks sensitive species or their habitat. As with the proposed project, the only potential biological resources impact would be removal or disturbance of street trees, which would be replaced if needed, resulting in a less-than-significant impact. Alternative 2 would have **similar** biological resource impacts as the proposed project.

PUBLIC SERVICES

Similar to the proposed project, Alternative 2 would develop a new office building with a net increase of employees in the downtown area. The number of employees in the office building, number of children allowed in the child-care facility, and employees working in the Heilbron House would be the same under Alternative 2 as under the project. The increased number of employees would result in a minor increase in demand for fire, police, solid waste disposal, and parks and recreation facilities. Under both the proposed project and Alternative 2, increased demands for public services would be less than significant. Therefore, impacts of this Alternative 2 on public services would be **similar** to those of the project.

AESTHETICS, LIGHT, AND GLARE

Both Alternative 2 and the proposed project would remove the surface parking lot and develop a new office building on the P Street Block and place child-care facilities on the roof of the Subterranean Building. However, Alternative 2 would move the Heilbron House next to the Stanford Mansion, allowing the entire P Street Block to be used for the office building. This could mean that the office building footprint is larger and the height is lower under Alternative 2. Both Alternative 2 and the proposed project would comply with design objectives and guidelines, as well as the City's Central City Urban Design Guidelines to the greatest degree possible, which are designed to avoid degradation in visual character of the Central City area. However, while design of the building, as with the proposed project, would be undertaken with considerable attention to creating architecture and surrounding spaces that would enhance the existing environment, the inherent visual impact of the high-rise building would be considerable, and the structure could be perceived as a substantial degradation of views for residents and workers in the area. Notwithstanding the foregoing, SB 743 (Public Resources Code Section 21099[d][1]) provides that aesthetic impacts of qualifying infill projects shall not be considered significant impacts on the environment. Because the proposed project and Alternative 2 would both be such qualifying projects, aesthetic impacts would be less than significant. Additionally, both would mitigate potential glare impacts to less than significant through design. However, shadows cast by the proposed office building in either Alternative 2 or the proposed project would be an unmitigable significant and unavoidable impact, even though the building in Alternative could be shorter than the proposed building. Alternative 2 would not avoid the significant and unavoidable shadow impact and mitigable glare impacts related to the proposed office building. Furthermore, as discussed under Cultural and Tribal Cultural Resources, above, both Alternative 2 and the proposed project would result in significant and unavoidable shadow impacts to the Heilbron House. Therefore, Alternative 2 would have **similar** visual resource impacts as the project.

7.4.3 Alternative 3: Capitol Area Plan Alternative

Alternative 3, the Capitol Area Plan Alternative, includes construction and operation of an office building on the P Street Block similar to that of the proposed project, with the Heilbron House left in its current location and child-care facilities installed on the rooftop plaza of the Subterranean Building. The office building in Alternative 3 would have a similar footprint, would allow for relocation of staff from the Resources Building, and would include the same overall program elements and energy efficiency goals as the proposed project. However, under Alternative 3, the office building would be consistent with the CAP office development program, which identifies the P Street Block for construction of an approximately 628,000 GSF office building with approximately 471,000 net square feet (CAP Figures 2-2, 2-4, and 3-1) (DGS 1997a, and b), as opposed to the 800,000 GSF, 600,000 net sq. ft. building in the proposed project. The CAP Alternative office building would be 228,000 GSF and 129,000 net sq. ft. smaller, or approximately 20 percent smaller, than the proposed office building. Alternative 3 would accommodate approximately 20 percent fewer office spaces, and would therefore be estimated to provide space for approximately 2,800 staff (approximately 700 less staff than the 3,500 under the proposed project). Alternative 2 would also provide less retail/commercial space providing for approximately 5,000 to 8,000 sq. ft. rather than an estimated 50,000 sq. ft. under the proposed project. Alternative 3 would provide for 355 parking spaces whereas the proposed project would provide only 50 parking spaces. The parking spaces would be primarily in an above-ground

structure as part of the office building, rather than multiple levels below grade due to groundwater levels in the area. Consistent with Figure 3-5 of the CAP Implementation Plan, the massing for this alternative would result in approximately five levels on the northeast and southwest corners of the P Street block, and an approximately 18-story tower on the southeastern portion of the block at 8th and P Streets, providing consistency with the Capitol View Protection Act's 250-foot height limit on the northeast corner of the block and stepping back the office building from the Heilbron House. This building would therefore be shorter than the proposed office building (which would be 20 stories).

LAND USE

Like the proposed project, Alternative 3 would construct an office building on the P Street Block, would leave the Heilbron House in its existing location, and would place child-care facilities on the rooftop plaza of the Subterranean Building. As with the proposed project, Alternative 3 would be consistent with the objectives of the CAP to provide office space and related services to meet present and future space requirements for the State of California near the State Capitol. In addition, Alternative 3 would support the Sacramento Region Blueprint, 2016 MTS/SCS, City of Sacramento 2035 General Plan, and Central City Community Plan, which like the State's CAP, call for infill development in downtown Sacramento, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating jobs closer to housing. Further, like the proposed project, Alternative 3 would consolidate and address State office space deficiencies in downtown Sacramento, increase use of underutilized state property, develop an energy-efficient office building near transit lines, or allow for relocation of State employees from other downtown buildings that are in need of renovation or replacement (such as the Resources Building). Neither the proposed project nor Alternative 3 would result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts of Alternative 3 would be **similar** to those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

Like the proposed project, Alternative 3 would not result in development of any new homes or generation of new residents. Alternative 3 would provide for approximately 20 percent less space for State staff and would therefore accommodate 20 percent fewer new State employees (approximately 960 rather than 1,200). In addition, the reduced retail and commercial elements would reduce associated employees. Because of a smaller building size, the temporary construction jobs would also be reduced in comparison to the proposed project. Although the proposed project would not generate new employment that would induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region, Alternative 3 would have an incrementally reduced impact due to less construction and less employee office space. Therefore, Alternative 3 would have **less** of an impact on population, employment, and housing compared to the proposed project.

TRANSPORTATION AND CIRCULATION

Consistent with the proposed project, Alternative 3 would construct an office building on the P Street Block and would place child-care facilities on the roof plaza of the Subterranean Building. The vehicular access points under Alternative 3 would remain the same as the proposed project. Because Alternative 3 would reduce the building size and construction effort, it would generate less short-term construction traffic. Because Alternative 3 would accommodate approximately 700 fewer State employees than the proposed project, local traffic impacts would be slightly reduced. It is unknown where these employees would otherwise work; they could remain in, or be transferred to existing State buildings in the downtown Sacramento area, resulting in a continued contribution to traffic impacts on local downtown intersections. If these employees are located in buildings either inside or outside the downtown area that are not as well served by transit as the project site, more employees may drive rather than using transit, resulting in more vehicle trips and more vehicle miles travelled (VMT) than the proposed project. Ultimately, the vehicle trips generated by 700 State employees is a relatively small percentage of the overall traffic volumes in the

downtown area and the region. It is likely that any differences in traffic impacts between Alternative 3 and the proposed project would be minor, and overall impacts under Alternative 3 would be **similar** to those of the proposed project.

UTILITIES AND INFRASTRUCTURE

Alternative 3 would include an office building of the same size as the proposed project, child care for 60-70 children at the Subterranean Building, and the relocated Heilbron House would continue to operate as an office for State Parks in its current location. Alternative 3 would result in a reduced demand for water, wastewater treatment, electricity, and natural gas, because the building size would be smaller and staff capacity would be approximately 20 percent lower than the proposed project. The footprint of the office building would be similar to the proposed project, because it would also be developed on the P Street Block with the Heilbron House in place. Therefore, impervious surfaces would be similar to the proposed project and stormwater runoff and demand for stormwater conveyance capacity would be the same. The proposed project would result in significant impacts associated with wastewater conveyance and natural gas infrastructure. However, these impacts would be reduced to less-than-significant levels with mitigation. Similar impacts and need for mitigation would occur under the Alternative 3. Therefore, Alternative 3 would result in utility and infrastructure impacts that are **similar** to those of the proposed project.

AIR QUALITY

Like the proposed project, Alternative 3 would include demolition of surface parking, construction of a new office building on the P Street Block, and installation of child-care facilities on the roof of the Subterranean Building, which would generate significant but mitigable construction-related air emissions. After mitigation, this impact would be reduced to less-than-significant levels under both the proposed project and Alternative 3. However, the reduced building size in this alternative would incrementally reduce construction-related emissions. In addition, the approximately 20 percent reduction in staff capacity, reducing State employees in the building by 700, would reduce the operation-related air emissions. However, the transportation-related air emissions may not be reduced under Alternative 3 because the 700 employees not transferred to the new office building could be located in buildings either inside or outside of the downtown area that are not as well served by transit as the P Street Block. Therefore, more employees may drive rather than using transit, resulting in more vehicle trips, more VMT, and more associated air emissions. The proposed project would not result in significant impacts after mitigation; therefore, Alternative 3 would not avoid any significant impacts. However, Alternative 3 would reduce construction- and operation-related air emissions relative to the proposed project, resulting in **less** severe air quality impacts than the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Like the proposed project, Alternative 3 would include demolition of surface parking, construction of a new office building, and installation of child-care facilities on the roof of the Subterranean Building, which would generate less-than-significant construction- and operations-related GHG emissions. However, the reduced building size in this alternative would incrementally reduce construction-related emissions. In addition, the approximately 20 percent reduction in staff capacity, reducing State employees in the building by 700, would reduce the operations-related GHG emissions. However, the transportation-related GHG emissions may not be reduced under Alternative 3 because the 700 employees not transferred to the new office building could be located in buildings either inside or outside of the downtown area that are not as well served by transit as the P Street Block. Therefore, more employees may drive rather than using transit, resulting in more vehicle trips, more VMT, and more associated GHG emissions. The proposed project would result in less-than-significant GHG impacts; therefore, Alternative 3 would not avoid any significant impacts. However, Alternative 3 would reduce construction- and operational-related GHG emissions relative to the proposed project, resulting in impacts that are somewhat **less** than the proposed project relative to GHG emissions and climate change.

NOISE

Like the proposed project, Alternative 3 would include demolition of surface parking and construction of a new office building on the P Street Block, and installation of child-care facilities on the roof of the Subterranean Building. Although, the reduced building size in this alternative would incrementally reduce construction-related noise, Alternative 3 would result in similar significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration impacts and noise impacts from building operation. However, because Alternative 3 would locate an office building and child-care facility of the same size/capacity on the same project site, Alternative 3 would result in similar significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration impacts and noise impacts from building operation. The overall construction and operational noise impacts of the Alternative 3 would be **similar** to the noise impacts of the proposed project.

GEOLOGY AND SOILS

Alternative 3 would require similar excavation of soils as the proposed project, resulting in similar less-than-significant construction-related erosion impacts. The potential increase in the risk of exposure to injury or property damage because of a seismic event would be the same for Alternative 3 as the proposed project. Because of the same existing site conditions for the office building, and required compliance with building standards, neither the proposed project nor Alternative 3 would result in significant impacts related to geology and soils. Therefore, Alternative 3 and the proposed project would have **similar** impacts related to geology and soils.

HYDROLOGY AND WATER QUALITY

Alternative 3 would require similar excavation of soils during construction, resulting in a similar potential for construction-related releases of sediment and contaminants into surface waters or groundwater in comparison to the proposed project. Alternative 3 would result in a new office building and related features, similar to the proposed project. Because the project site is already developed with impervious surfaces, long-term changes to runoff and water quality resulting from the project would be less than significant for both the proposed project and Alternative 3. Similarly, various stormwater pollution prevention devices and BMPs would be implemented, and like the project, the Alternative 3 would be required to comply with existing State and local regulations regarding the City's CSS and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Alternative 3, like the proposed project, would not result in any significant impacts related to hydrology and water quality. Therefore, Alternative 3 would result in **similar** impacts to the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

Like the proposed project, demolition, excavation and construction activities associated with Alternative 3 could result in the exposure of construction workers and the public to hazardous materials. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent a significant risk to construction workers or the public under either the project or Alternative 3. Construction and operation of either the proposed project or the Alternative 3 would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Because neither the project nor the Alternative 3 would result in any significant impacts related to hazardous materials and public health, Alternative 3 would have **similar** impacts as the proposed project with regard to hazardous materials and public health.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 3 would require similar excavation of soils during construction, which would result in similar ground disturbance to the project and similar potential to disturb undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. In addition, like the proposed project, the Heilbron House would remain in its current location with a new office building developed next to it on the P Street Block. Under both the proposed project and Alternative 3, there would be a significant and unavoidable shadow impact and impact related to the change in the immediate surroundings of the Heilbron House. Therefore, Alternative 3 would not avoid the project's significant and unavoidable impact to this historic resource and would result in **similar** cultural resource impacts to the proposed project.

BIOLOGICAL RESOURCES

Alternative 3 would develop the same project site with similar above-ground structures as the proposed project. The project site is currently developed with urban uses and lacks sensitive species and their habitat. As with the proposed project, the only potential biological resources impact would be removal or disturbance of street trees, which would be replaced if needed, resulting in a less-than-significant impact. Alternative 3 would have **similar** biological resource impacts as the proposed project.

PUBLIC SERVICES

Similar to the proposed project, Alternative 3 would develop a new office building with a net increase of employees in the downtown area. Although the number of children allowed in the child-care facility and employees working in the Heilbron House would be the same under Alternative 3, the number of employees in the office building would be reduced by approximately 700 compared to the proposed project. The reduced number of employees would result in an incremental reduction in demand for fire, police, solid waste disposal, and parks and recreation facilities. However, the 700 employees not transferred to the new office building could be located in buildings either within or outside the downtown area, potentially resulting in the same demand for public services as the proposed project, but in different locations. Under both the proposed project and Alternative 3, increased demands for public services would be less than significant. Therefore, impacts of this alternative on public services are considered to be **similar** to those of the project.

AESTHETICS, LIGHT, AND GLARE

Both Alternative 3 and the proposed project would remove the surface parking lot, retain the Heilbron House in its current location, and develop a new office building on the P Street Block and would place child-care facilities on the rooftop plaza of the Subterranean Building. The office building in Alternative 3 would be reduced in size, with a similar footprint to the proposed project, but reduced building height. Both Alternative 3 and the proposed project would comply with design objectives and guidelines, as well as the City's Central City Urban Design Guidelines to the greatest degree possible, which are designed to avoid degradation in visual character of the Central City area. Because the building under Alternative 3 would also be a qualifying infill project as defined by SB 743, described above, aesthetic impacts would be less than significant despite the considerable and inherent visual impact of the high-rise building. Additionally, both would mitigate potential glare impacts to less than significant through design. However, wintertime shadows cast by the proposed office building in either Alternative 3 or the proposed project would be a significant and unavoidable impact, even though the building in Alternative 3 would be somewhat shorter than the proposed building. Alternative 3 would not avoid the significant and unavoidable shadow impact and mitigable glare impacts related to the proposed office building. Therefore, Alternative 3 would have **similar** visual resource impacts as the project.

7.4.4 Alternative 4: Child Care at OB 8/9 Alternative

Alternative 4, Child Care at OB 8/9 Alternative, is the same as the proposed project in all respects except for the location of the child-care facility. Under Alternative 4, the child-care facility would be located in the plaza of the State-owned OB 8/9 office building, south of the P Street Block, rather than on the rooftop plaza of the State's Subterranean Building to the north. The OB 8/9 plaza is on the southwest corner of the intersection of 8th and P Streets. The portion of the plaza with trees and a water feature would house the child-care facility. Modular buildings would be placed within the trees, retaining as many trees as possible to provide shade. The water feature would be removed to help accommodate the modular buildings and an outside play area. This child-care facility would accommodate 60 to 70 children, like the proposed project. There is an existing child-care center located in the northwestern OB 8/9 tower. This center has arranged to cone off a portion of P Street, between 7th and 8th Streets, between the hours of 7:00 a.m. to 9:00 a.m. for drop-off and 4:00 p.m. to 6:00 p.m. for pick-up. This area could also be used for drop-off and pick-up for the new child-care center.

LAND USE

Like the proposed project, Alternative 4 would construct an office building on the P Street Block and would leave the Heilbron House in its existing location; however, child-care facilities would be located at OB 8/9 rather than the Subterranean Building. OB 8/9 is designated "office" in the CAP and child care is an allowed use; in fact, child care is already provided at OB 8/9. As with the proposed project, Alternative 4 would be consistent with the objectives of the CAP to provide office space and related services to meet present and future space requirements for the State of California near the State Capitol. In addition, Alternative 4 would support the Sacramento Region Blueprint, 2016 MTS/SCS, City of Sacramento 2035 General Plan, and Central City Community Plan, which like the State's CAP, call for infill development in downtown Sacramento, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating jobs closer to housing. Further, like the proposed project, Alternative 4 would consolidate and address State office space deficiencies in downtown Sacramento, increase use of underutilized state property, develop an energy-efficient office building near transit lines, or allow for relocation of State employees from other downtown buildings that are in need of renovation or replacement (such as the Resources Building). Neither the proposed project nor Alternative 4 would result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts of Alternative 4 would be **similar** to those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

Like the proposed project, Alternative 4 would not result in development of any new homes or generation of new residents. Both the proposed project and Alternative 4 would allow space for an increase of approximately 1,200 new State employees, approximately 100 employees for retail and commercial elements, and up to 590 temporary construction jobs during peak construction periods; however, the project-related increase in employment would not induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region. Alternative 4 would result in **similar** impacts on population, employment, and housing compared to the proposed project.

TRANSPORTATION AND CIRCULATION

Consistent with the proposed project, Alternative 4 would construct an office building on the P Street Block; however, this alternative would place child-care facilities at OB 8/9. The vehicular access for the new office building would be the same as the proposed project, but there would be additional vehicular access for child care drop-off and pick-up at OB 8/9 (P Street, between 7th and 8th Streets). The capacity of the office building and the child care would be the same as the proposed project. Therefore, as with the proposed project, Alternative 4 would add a small number of new trips to the roadway network in the vicinity, but

would not cause degradation of LOS. Both would result in small operational increases in freeway off-ramp queues, and transit, bicycle, and pedestrian trips, but existing facilities are more than adequate to accommodate the small increases. Similar to the proposed project, construction of Alternative 4 would temporarily disrupt traffic in the vicinity of the project site, potentially through lane closures, lane narrowing, and detours, and these localized and temporary impacts would be minimized through implementation of a Construction Traffic Management Plan in accordance with City of Sacramento Code. Because the project would not result in significant transportation impacts, Alternative 4 would not avoid any such impacts. In addition, it is likely that any differences in traffic patterns due to the child care drop-off/pick-up would be minor. Therefore, Alternative 4 would result in **similar** transportation and circulation impacts than the proposed project.

UTILITIES AND INFRASTRUCTURE

Alternative 4 would include an office building of the same size as the proposed project, child care for 60-70 children at OB 8/9, and the Heilbron House would continue to operate as an office for State Parks. Alternative 4 would therefore result in the same demand for water, wastewater treatment, electricity, and natural gas as the proposed project, even if the demand is generated at different locations. The office building footprint and impervious surfaces would be similar to the proposed project; therefore, stormwater runoff and demand for stormwater conveyance capacity would be the same. The proposed project would result in significant impacts associated with wastewater conveyance and natural gas infrastructure. However, these impacts would be reduced to less-than-significant levels with mitigation. Similar impacts and need for mitigation would occur under the Alternative 4. Therefore, Alternative 4 would result in **similar** utility and infrastructure impacts to those of the proposed project.

AIR QUALITY

Like the proposed project, Alternative 4 would include demolition of surface parking, construction of a new office building, and installation of child-care facilities, which would generate significant but mitigable construction-related air emissions. After mitigation, this impact would be reduced to less-than-significant levels under both the proposed project and Alternative 4. Operations- and transportation-related air emissions would be the same as the proposed project because the number of employees would be the same, as would the size of the office building and child care. Like the proposed project, Alternative 4 would be served by transit and would provide bicycle parking, showers, and lockers consistent with the proposed project. Therefore, Alternative 4 would result in **similar** air quality impacts to the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Like the proposed project, Alternative 4 would include demolition of surface parking, construction of a new office building, and installation of child-care facilities, which would generate less-than-significant construction- and operations-related GHG emissions. Both the proposed project and Alternative 4 would result in less-than-significant GHG impacts; therefore, Alternative 4 would result in **similar** construction- and operational-GHG emissions to the proposed project.

NOISE

Like the proposed project, Alternative 4 would include demolition of surface parking and construction of a new office building on the P Street Block, and installation of child-care facilities. Although Alternative 4 would move child care to OB 8/9, the size and capacity of office and child-care facilities would be the same as the proposed project. Alternative 4 would result in similar significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration impacts and noise impacts from building operation. The overall construction and operational noise impacts of the Alternative 4 would be **similar** to the noise impacts of the proposed project.

GEOLOGY AND SOILS

Alternative 4 would require similar excavation of soils as the proposed project, resulting in similar less-than-significant construction-related erosion impacts. The potential increase in the risk of exposure to injury or property damage because of a seismic event would be the same for Alternative 4 as the proposed project. Because of the same existing site conditions for the office building, and required compliance with building standards, neither the proposed project nor Alternative 4 would result in significant impacts related to geology and soils. Therefore, Alternative 4 and the proposed project would have **similar** impacts related to geology and soils.

HYDROLOGY AND WATER QUALITY

Alternative 4 would require similar excavation of soils during construction, resulting in a similar potential for construction-related releases of sediment and contaminants into surface waters or groundwater in comparison to the proposed project. Alternative 4 would result in a new office building and related features similar to the proposed project. Because the project site is already developed with impervious surfaces, long-term changes to runoff and water quality resulting from the project are considered less than significant for both the proposed project and Alternative 4. Similarly, various stormwater pollution prevention devices and BMPs would be implemented, and like the project, the Alternative 4 would be required to comply with existing State and local regulations regarding the City's CSS and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Alternative 4, like the proposed project, would not result in any significant impacts related to hydrology and water quality. Therefore, Alternative 4 would result in **similar** impacts to the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

Like the proposed project, demolition, excavation and construction activities associated with Alternative 4 could result in the exposure of construction workers and the public to hazardous materials. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent a significant risk to construction workers or the public under either the project or Alternative 4. Construction and operation of either the proposed project or the Alternative 4 would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Because neither the project nor the Alternative 4 would result in any significant impacts related to hazardous materials and public health, Alternative 4 would have **similar** impacts as the proposed project with regard to hazardous materials and public health.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Alternative 4 would require similar excavation of soils during construction, which would result in similar ground disturbance to the project and similar potential to disturb undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. In addition, like under the proposed project, the Heilbron House would remain in its current location with a new office building developed next to it on the P Street Block. Under both the proposed project and Alternative 4, there would be a significant and unavoidable shadow impact and a mitigable impact related to the change in the immediate surroundings of the Heilbron House. Therefore, Alternative 4 would not avoid the project's significant and unavoidable impact to this historic resource and would result in **similar** cultural resource impacts to the proposed project.

BIOLOGICAL RESOURCES

Alternative 4 would develop the same project site with similar above-ground structures as the proposed project; in addition, child care would be located at OB 8/9. The project site is currently developed with urban

uses and lacks sensitive species or their habitat. As with the proposed project, the only potential biological resources impact would be removal or disturbance of street trees, which would be replaced if needed, resulting in a less-than-significant impact. Alternative 4 would have **similar** biological resource impacts as the proposed project.

PUBLIC SERVICES

Similar to the proposed project, Alternative 4 would develop a new office building with a net increase of employees in the downtown area. The number of children allowed in the child-care facility and employees working in the Heilbron House would also be the same under Alternative 4 compared to the proposed project. Therefore, Alternative 4 would result in the same demand for fire, police, solid waste disposal, and parks and recreation facilities. Under both the proposed project and Alternative 4, increased demands for public services would be less than significant. Therefore, impacts of Alternative 4 on public services are **similar** to those of the project.

AESTHETICS, LIGHT, AND GLARE

Both Alternative 4 and the proposed project would remove the surface parking lot, retain the Heilbron House in its current location, and develop a new office building on the P Street Block. Alternative 4 would place child-care facilities at OB 8/9 south of the building site rather than atop the Subterranean Building north of the site. Both Alternative 4 and the proposed project would comply with design objectives and guidelines, as well as the City's Central City Urban Design Guidelines to the greatest degree possible, which are designed to avoid degradation in visual character of the Central City area. Because the building under Alternative 4, as with the proposed project, would be a qualifying infill project as defined by SB 743, described above, aesthetic impacts would be less than significant despite the considerable and inherent visual impact of a high-rise building. Additionally, both would mitigate potential glare impacts to less-than-significant levels through design. However, shadows cast by the proposed office building in either Alternative 4 or the proposed project would be an unmitigable significant and unavoidable impact. Alternative 4 would not avoid the significant and unavoidable shadow impact and mitigable glare impacts related to the proposed office building. Therefore, Alternative 4 would have **similar** visual resource impacts as the project.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project–No Development Alternative (described above in Section 7.4.1) would avoid all adverse impacts resulting from construction and operation of the Resources Building Replacement Project analyzed in Chapter 4, it is the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the objectives the project as presented above in Section 7.2.

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 7-1, below, Alternative 3, the Capitol Area Plan Alternative, would be environmentally superior action alternative because although the environmental impacts would be similar to the proposed project, and no significant impacts or significant and unavoidable impacts would be completely avoided, the reduced degree of construction and reduced building size would reduce the employee population and reduce the emissions of criteria air pollutants and GHGs generated by the construction and operation of the project.

Table 7-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed Resources Building Replacement Project

Environmental Topic	Proposed Project	Alternative 1: No Project – No Development Alternative	Alternative 2: Relocate Heilbron House Alternative	Alternative 3: Capitol Area Plan Alternative	Alternative 4: Child Care at OB 8/9 Alternative
Land Use	Less than Significant	Greater	Similar	Similar	Similar
Population, Employment, and Housing	Less than Significant	Less	Similar	Less	Similar
Transportation and Circulation	Less than Significant	Less	Greater	Similar	Similar
Utilities	Less than Significant with Mitigation	Less	Similar	Similar	Similar
Air Quality	Less than Significant with Mitigation	Less	Similar	Less	Similar
Greenhouse Gas Emissions and Climate Change	Less than Significant	Less	Similar	Less	Similar
Noise	Significant and Unavoidable	Less	Similar	Similar	Similar
Geology and Soils	Less than Significant	Less	Similar	Similar	Similar
Hydrology and Water Quality	Less than Significant	Similar	Similar	Similar	Similar
Hazards and Hazardous Materials	Less than Significant	Less	Similar	Similar	Similar
Cultural Resources and Tribal Cultural Resources	Significant and Unavoidable	Less	Similar	Similar	Similar
Biological Resources	Less than Significant with Mitigation	Less	Similar	Similar	Similar
Public Services	Less than Significant	Less	Similar	Similar	Similar
Aesthetics, Light, and Glare	Significant and Unavoidable	Less	Similar	Similar	Similar

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