CHAPTER 6
Project Alternatives

6.1 Overview

An EIR must describe a range of alternatives to the proposed projects that might feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The feasibility of an alternative is determined by the lead agency based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (State CEQA Guidelines section 15126.6(f)(1)).

This chapter presents the applicant objectives of the proposed projects, summarizes the significant effects of the proposed projects that cannot be avoided or reduced to insignificance, and describes the alternatives that were considered but dismissed from further evaluation. This chapter identifies the alternatives that were evaluated in the 2007 RSP EIR, and then revises those to develop alternatives that are reasonable in the context of the current proposals. In addition to alternatives to the RSPU, this chapter evaluates alternatives to the project-specific components, including the KP Medical Center, the MLS Stadium and the Stormwater Outfall.

This chapter also identifies the alternatives that were evaluated in the 2007 RSP EIR.

The chapter then discloses the comparative effects of each of the alternatives relative to the proposed projects, and evaluates the relationship of the alternatives to the project objectives. As required under section 15126.6(e) of the State CEQA Guidelines, an environmentally superior alternative is identified and addressed at the end of this chapter.

6.2 Factors in the Selection of Alternatives

6.2.1 Project Objectives

The following are the project applicants' stated objectives for the proposed projects:

Railyards Specific Plan Update

The overall goal of the RSPU is the orderly and systematic development of an integrated mixed-use component of the downtown community that is compatible with site characteristics and consistent with the City's goals and policies. More specifically, the objectives of the proposed RSPU are:

1. Transform the Railyards area from an underutilized industrial site into a transit-oriented, attractive, and vibrant mixed-use contribution to development, enhancement, and preservation of the City fabric;

2. Promote a dynamic 24-hour mixed use urban village that provides a range of complementary uses—including cultural, office, hospitality, health care, entertainment, retail, residential, educational and open space—and a mixture of housing types, including affordable housing;

3. Integrate the Railyards area into the fabric of the existing Central City. The Railyards have historically been isolated from the Central City and the opportunity exists to seamlessly connect the area in all directions with the rest of the City;

4. Provide a land use regulatory framework that promotes density, facilitates vertical and horizontal mixed-use, and is flexible to allow development to respond to changing market conditions;

5. Connect the Railyards with Sacramento's downtown office, retail, and government center, as well as Old Sacramento, the River District, and the Alkali Flat neighborhood, using pedestrian and bicycle facilities, roadways, and public transportation;

6. Connect the Railyards to the Sacramento River waterfront, and allow for hotel, public open space, retail, waterfront residential and recreational uses consistent with the Riverfront Master Plan, resulting in a vibrant waterfront amenity, serving the City and the region;

7. Utilize the historic Central Shops buildings as a community resource and heritage tourism draw, as well as inspiration for a mix of uses that will help to create a culturally vibrant urban City core;

8. Promote downtown development that is a regional draw for the City of Sacramento due to its geographic location near the Sacramento River waterfront and its unique mix of community amenities including transportation options, cultural experiences and entertainment opportunities, and residential, office, hospitality, retail, a regional medical center, a sports and entertainment stadium, open space, and other desirable uses consistent with the City's plans and policies;

9. Provide sufficient land, entitlements, and regulatory provisions to support the development of a Kaiser Permanente regional medical center and a multi-purpose stadium that could accommodate a Major League Soccer franchise, including conveniently located parking;

10. Provide a mix of uses that complement and support the Sacramento Valley Station and the City's planned Sacramento Intermodal Transit Facility (SITF), connecting the Central City to the region, the state, and beyond;

11. Promote environmental sustainability through use of green building technology, water conservation, renewable energy resources, or other community innovations as appropriate;

12. Contribute to the successful implementation of the City's 2035 General Plan and SACOG's Metropolitan Transportation Plan/Sustainable Communities Strategy; and

13. Promote a transportation corridor that accommodates the needs of regional and local passenger rail, freight rail, bus service, and other alternative modes of transportation.

KP Medical Center

The overall goal of the KP Medical Center is to construct and operate a new, state-of-the-art, approximately 1.3 million square foot flagship medical center campus located on the western end of the RSP Area that would provide high-quality, affordable health care services to KP members in the City of Sacramento and surrounding communities. More specifically, the objectives of the proposed KP Medical Center are to:

1. Design a new medical campus in a manner which allows the flexibility to respond to the varied and evolving health care demands of KP members living in Sacramento and surrounding areas, and within the framework of a rapidly changing health care industry and KP's obligation to serve as a responsible steward of its members' dues;

2. Supplement and support KP's existing regional clinics and medical facilities, completely relocate capacity and medical uses from KP's existing older facility located at Morse Avenue in Sacramento to a new seismically-safe medical center, and provide desirable advanced medical facilities to the community;

3. Relying on Kaiser Permanente's extensive experience with building major medical centers throughout the nation, construct a medical center of approximately 1.3 million square feet of hospital and medical uses, under local and state regulatory oversight and with maximum operational and cost efficiencies, on a sizeable, approximately 17.8-acre portion of the RSP Area with long range development capacity, which will accommodate expected future growth of KP members requiring health care services;

4. Contribute to the transformation of Downtown Sacramento into a commercial and community hub, thereby advancing the goals, policies, and objectives of the RSP;

5. Create a comprehensively planned, advanced care medical center within the RSP Area which provides community vitality, economic growth and a wide range of employment opportunities in Sacramento and surrounding regions;

6. Construct a new medical campus within a revitalized Downtown Sacramento area at a site with convenient freeway access, close proximity to existing public transportation, and infrastructure, along with helistop capabilities;

7. Provide quality public open space on the Medical Center campus for informal community gathering spaces, to enhance opportunities for pedestrian and bicycle mobility and connectivity within the Medical Center campus and from Railyards Boulevard to Vista Park, and to provide convenient and desirable access to physical activity as part of achieving Kaiser's Thrive© mission; and

8. Augment the sustainable community practices employed within the RSP Area by constructing a medical center campus utilizing green building technology, water conservation features and energy-efficient infrastructure.

MLS Stadium

The overall goal of the MLS Stadium project is to build and operate a stadium that can serve as the home to a new Sacramento-based Major League Soccer (MLS) team that would be an outgrowth of and capitalize on the success of the United Soccer League (USL) Sacramento Republic FC. The specific objectives of the proposed MLS Stadium are:

1. Develop a state-of-the-art multipurpose stadium and entertainment facility that meets MLS industry standards, with capacity for up to approximately 25,000 ticketed attendees that will serve as the long-term home of the Sacramento Republic FC;

2. Locate the stadium and entertainment facility on a site that can be readily assembled and that enables development of the facility within budget and on schedule to accommodate MLS expansion efforts;

3. Develop and design the stadium and entertainment facility to promote major entertainment, family and civic events that are compatible with, and enhance, the RSP Area and surrounding vicinity;

4. Leverage the stadium and entertainment facility to catalyze redevelopment of the Railyards area consistent with the objectives of the RSPU and help promote

redevelopment of underutilized downtown properties throughout the Central Business District; and

5. Promote access to the stadium and entertainment facility by multiple modes of transportation, including convenient parking.

Stormwater Outfall

The overall goal of the Stormwater Outfall project is to construct an outfall to the Sacramento River that accommodates the needs of the Railyards stormwater drainage system and meets the requirements of the City and relevant regulatory agencies. The specific objectives of the proposed Stormwater Outfall project are:

1. Design a Stormwater Outfall that allows for full development of the Railyards area that facilitates integration of the project into the fabric of the existing Central City;

2. Construct an outfall structure that will provide stormwater management and protection to the majority of the Railyards area;

3. Create an outfall structure that will safely discharge stormwater flows from the Railyards area into the Sacramento River in compliance with local, state and federal requirements;

4. Design the outfall structure to facilitate and maximize pedestrian and bicycle access on the levee-top bicycle and pedestrian path and to maintain the views of the Sacramento River;

5. Minimize the impact of discharged flows into the existing Combined Sewer System and other stormwater drainage systems servicing the City of Sacramento;

6. Design, construct, and operate an outfall structure that maintains the structural integrity of the Sacramento River bank and levee, and that minimizes any disruption to natural habitats on or adjacent to the outfall site; and

7. Design and construct a stormwater outfall structure that can be accepted by dedication to the City of Sacramento and thereafter operated by the City of Sacramento in compliance with local, state and federal requirements.

6.2.2 Significant Effects of the Proposed Projects

Table 6-1 lists the project-specific and cumulative significant and unavoidable impacts of the proposed projects, as discussed in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures. In many cases, an impact is significant and unavoidable for one or more, but not all, of the proposed projects. The impacts that are significant but that can be mitigated to a less-

than-significant level are shown in **Tables 6-3**, **6-4**, **6-5** and **6-8** (presented at the end of this chapter) for the RSPU, KP Medical Center, the MLS Stadium, and the Stormwater Outfall, respectively.

TABLE 6-1.
PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS BY PROJECT

Impacts	RSPU	KP Medical Center	MLS Stadium	Stormwater Outfall
4.1 Aesthetics				
Impact 4.1-3: The proposed projects could create substantial new sources of light.	X		X	
4.2 Air Quality				
Impact 4.2-3: The proposed projects could result in long-term (operational) emissions of NOx ROG, PM10, or PM2.5.	X	X		
Impact 4.2-9: The proposed project could contribute to cumulative increases in long-term (operational) emissions of NOx ROG, PM10 and PM2.5.	X	X	X	X
4.3 Biological Resources				
Impact 4.3-2: Development of the proposed projects could result in the loss of potential nesting habitat for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	X	X	X	X
Impact 4.3-11: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative harm to, or loss of nesting habitat, for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	X	X	X	X
4.4 Cultural Resources				
Impact 4.4-8: The proposed projects could contribute to the cumulative loss or alteration of archaeological resources, including human remains.	X	X	X	
4.10 Noise				
Impact 4.10-1: Construction of the proposed projects could generate noise that would conflict with City standards.	X	X	X	
Impact 4.10-2: Operations of the proposed projects could result in a substantial permanent increase in ambient exterior noise levels in the project vicinity.	X	X	X	
Impact 4.10-4: Construction of the proposed projects could expose existing and/or planned buildings, and persons within, to vibration that could disturb people and damage buildings.	X	X	X	

TABLE 6-1.
PROJECT-SPECIFIC SIGNIFICANT AND UNAVOIDABLE IMPACTS BY PROJECT

Impacts	RSPU	KP Medical Center	MLS Stadium	Stormwater Outfall
Impact 4.10-7: The proposed projects would contribute to cumulative construction that could expose existing and/or planned buildings, and persons within, to significant vibration.	X	X	X	
4.12 Transportation				
Impact 4.12-1: The proposed projects could worsen conditions at intersections in the City of Sacramento.			X	
Impact 4.12-3: The proposed projects could worsen vehicle queuing at off-ramps on I-5.	X	X	X	
4.12-10: The proposed projects could worsen vehicle queuing at off-ramps on I-5 under cumulative conditions.	X	X	X	
4.13 Utilities				
4.13-7: The proposed projects would contribute to cumulative increases in demand for water supply and treatment.	X	X	X	

The cumulative impacts of the proposed projects were also evaluated in Chapter 4. For the most part, if the RSPU contribution toward a cumulative impact would be significant, then the KP Medical Center, MLS Stadium and Stormwater Outfall contributions to cumulative impacts would also be considered significant, because they are all components of the RSPU. The exceptions would be where one or more of the project components would not itself have any impact. For example, the KP Medical Center and MLS Stadium would both generate traffic, which would be part of the RSPU contribution to cumulative operational traffic congestion. The Stormwater Outfall, however, would not generate any traffic after construction, so it would not contribute to cumulative operational traffic impacts.

6.3 Alternatives Considered but Dismissed From Further Evaluation

In identifying alternatives to the proposed projects, primary consideration was given to alternatives that could reduce significant unavoidable impacts resulting from the proposed projects while still obtaining the projects' objectives. Certain impacts that are identified as being significant and unavoidable under the proposed projects (e.g., increase in air pollutants from project construction and operation) are due primarily to developing an area that is currently undeveloped or intensifying development activity beyond current levels. These impacts would not be possible to eliminate, but could be reduced, for example, by limiting the

size of the project, reconfiguring uses, or implementing mitigation measures. Alternatives that reduce the intensity of development on the project site or change the location of the project are addressed later in this chapter.

The 2007 RSP EIR considered a number of alternatives that were dismissed from further analysis because they would not meet most of the basic project objectives and/or would not substantially reduce identified significant impacts. The 2007 RSP DEIR discusses those alternatives that were dismissed from further consideration on pages 8-4 through 8-7. This list is applicable to the RSPU as well. The alternatives that were considered but dismissed in the 2007 EIR are summarized below.

- **Low Density Residential-Only Alternative:** The low-density, residential-only alternative proposed to develop the RSP Area as mostly single-family residential units, but was determined to be economically infeasible based on the high cost of site remediation and a failure to meet most of the objectives of the 2007 RSP. Although extensive remediation has occurred since 2007, a low density residential development would still not be economically feasible due to the costs of infrastructure and developing in a downtown area, particularly given the need, pursuant to the residential restrictions in the 2015 Land Use Covenant and the remediation standards that require extensive fill wherever there would be contact with soil (e.g., backyards). Therefore, the reasons for rejecting this alternative in 2007 would be valid for the 2016 RSPU as well. In addition, a low-density development would not be consistent with the City's 2035 General Plan, which envisions high-density residential development in the Central City.

- **Low Building Height Alternative:** The low building height alternative would keep the same densities for the RSP but limit building heights to four stories. This alternative would reduce impacts associated with dense development, such as traffic congestion, but was found to be unlikely to generate the revenues needed to support the high cost of infrastructure improvements. Further, it was likely that the reduction in residential, office and retail uses in the RSP Area would be shifted to other locations in the area, so the impacts would be dispersed rather than eliminated, and could even be greater than the 2007 RSP, particularly impacts stemming from increased vehicle miles traveled (VMT). The alternative was dismissed because it failed meet most of the basic objectives of the 2007 RSP and also failed to substantially lessen environmental impacts. The same rationale would apply to the RSPU, which is intended to be a high-density, urban mixed-use project.

- **Central Shops Rehabilitation/Center City Park Alternative:** This alternative would have focused around the redevelopment of the Central Shops and provide a large-scale active and passive park space in the remainder of the RSP Area. The alternative was dismissed from further consideration because it would result in greater environmental

effects associated with housing, office, retail and other uses eliminated from the 2007 RSP being developed elsewhere in the greater Sacramento region, and because it would fail to meet any the objectives of the 2007 RSP. This would be true for the RSPU as well.

No other potential feasible alternatives to the proposed RSPU have been identified that are not encompassed by or addressed in the alternatives analyzed in this chapter.

For this SEIR, there are three project-specific components, each of which would result in significant impacts, and are therefore subject to separate alternatives analyses. The following alternatives were considered but dismissed from further analysis for the project components, because they would not fulfill most of the project objectives, would not eliminate or substantially lessen environmental effects, and/or would otherwise be infeasible.

KP Medical Center

- **No Pile Driving Alternative:** One of the significant impacts associated with development of the KP Medical Center is noise associated with pile driving during construction. A preliminary Foundations Assessment Report was prepared to assess site suitability for construction. Based on soil conditions, liquefaction potential and lack of bearing capacity, the Report concludes that pile driving would be required to construct the KP Medical Center as proposed.[1] The maximum height that could be achieved on the KP Medical Center site using conventional construction techniques (without pile driving) would likely be 4 stories. In order to contain the hospital uses described for the hospital and hospital support building (658,000 square feet (sf) and 210,000 sf, respectively, the floor plate would need to be approximately 5 acres (217,000 sf per floor). Floor plates of this size would be unwieldy, inefficient, and in some cases would not meet code. For example, the entire 252 beds planned for Phase 1 would need to be placed on one floor, which would be against such code requirements as those for exits and windows in patient rooms. For these reasons, a "no pile driving" alternative was not further analyzed.

- **Offsite Location:** The primary objectives of the KP Medical Center are to relocate medical uses from Kaiser's existing older facility located at Morse Avenue in Sacramento to a new, seismically-safe medical center. In order to accommodate the patient demand that currently exists at the Morse Avenue facility, the new KP Medical Center needs to be at least as large as the Morse Avenue facility. The number of inpatient beds, the square footage and types of services provided on site, and the medical office facilities must at least be comparable in size and scale to the Morse Avenue facility. For these reasons, an offsite location would need to be approximately 17.8 acres, and could

[1] Lionakis, 2015. *Kaiser Permanente Sacramento Railyards Master Plan Dewatering and Foundations Construction Techniques Narrative*, September 4, 2015, page 1.

be larger if placed in a suburban location necessitating surface parking and low-profile building forms.

In addition, the facility would need to be located near a major transportation corridor so that it could be quickly and easily accessed by emergency vehicles. A suburban location would be acceptable, if there could be adequate separation from residences and/or other sensitive uses so that they would not be subject to repeated helicopter noise. Access to transit is also important for Kaiser patients who do not drive. Finally, the hospital must be located in an area with greater than 100-year flood protection. One possible site, the Sleep Train Arena site in Natomas, would not have full 100-year flood protection in the near term. The City is not aware of another site within the city boundaries that would meet these criteria and would be available to Kaiser Permanente for purchase and use as a hospital, and would have fewer or less severe environmental effects than the proposed KP Medical Center in the Railyards.

- **Existing Morse Avenue Facility:** Upgrading and/or expanding the Morse Avenue facility is also not considered feasible. The existing facility does not meet seismic code, so extensive and expensive retrofitting would be needed. Bringing the existing facility up to code would require larger hospital rooms and other facilities, so that the number of beds that could be accommodated within the existing facility would be substantially reduced. Renovation would also disrupt ongoing services. Expanding the existing facility and/or building a new 420-bed facility would be more costly and take longer than a new facility at the RSP Area. It would also be more disruptive of ongoing services at the Morse Avenue facility. A new building at Morse Avenue would require demolition of the existing hospital, which would result in additional construction air emissions. In addition, the RSP Area is better situated for transportation and transit than the Morse Avenue facility.

No other potentially feasible alternatives to the proposed KP Medical Center have been identified that are not otherwise encompassed by or addressed in the alternatives analyzed in this chapter.

MLS Stadium

Enclosed Stadium: Among the impacts of the MLS Stadium is noise from crowds and amplified speech and entertainment. One way to reduce crowd noise and noise from events within the Stadium would be to cover the stadium, so that these noises would be confined to the interior. This alternative was not addressed further for several reasons:

- Soccer is an outdoor sport. The vast majority of all professional soccer stadiums do not have a fully enclosed roof. The few examples where soccer is played indoors exist within stadiums that accommodate a range of 30,000 to 75,000 attendees, are used as

multipurpose venues and have retractable roofs. Few soccer stadiums in the world fit within this model. For example, there is only one professional soccer team in the world that currently plays within a domed stadium (no retractable roof). The Sapporo Dome is located in Sapporo, Japan. The stadium has a fully retractable soccer pitch. A fully enclosed roof typically increases the stadium cost by approximately $100 Million. A retractable roof typically increases the stadium cost by approximately $150 Million.

- The MLS does not consider artificial turf to be acceptable for the play field. A retractable roof would therefore require adding grow lights to the project. This would not only add project costs but also substantially increase the energy loads of the building.

- A retractable roof would decrease the energy efficiency of the building.

- There are typically three types of roofs used by professional soccer stadiums that are not enclosed—no roof, canopies that cover a portion of the stands, and full wraparound roof. Under the latter, which is the type of roof proposed for the MLS Stadium, the pitch and portions of the seating are open to the sky. This type of roof provides the most screening and protection from weather without being fully enclosed, along with energy optimization through solar utilization.

For the above reasons, a fully enclosed stadium was not analyzed.

No other potentially feasible alternatives to the proposed MLS Stadium have been identified that are not otherwise encompassed by or addressed in the alternatives analyzed in this chapter.

Stormwater Outfall

- **Alternative Location**: The impacts of the Stormwater Outfall would be the result of construction activities along the Sacramento River bank. One option would be to relocate the Outfall. However, given that the Outfall must discharge to the river, any location is likely to have similar impacts. Further, the current presence of the I Street Bridge limits the distance downstream that the Outfall structure could be constructed, and the planned location of the I Street Bridge replacement limits the distance upstream that the Outfall structure could be placed.

- **Cistern**: The 2007 RSP provided for the construction of a subsurface cistern, which would detain the first-flush component of stormflows, and then discharge the water to the City's combined sewer system in the vicinity of 3rd & I Streets. Drainage flows in excess of the first-flush storage capacity would be detained in a second chamber and discharged to the Sacramento River. The proposed RSPU does not include the cistern because decentralized low impact development (LID) measures were determined to be more effective than the centralized water quality treatment that would have occurred within the

cistern. Further, because it would require construction of both a cistern and an outfall on the river, this alternative would have similar impacts to the RSPU Stormwater Outfall. For these reasons, the cistern was not considered further in the alternatives analysis.

No other potentially feasible alternatives to the proposed Stormwater Outfall have been identified that are not otherwise encompassed by or addressed in the alternatives analyzed in this chapter.

6.4 Alternatives Selected for Further Consideration

This section describes the range of alternatives to the proposed projects that are analyzed in this Draft SEIR and presents how specific impacts differ in severity from those associated with the proposed projects. For the most part, significant impacts of the alternatives can be mitigated to insignificance through adoption of mitigation measures identified in Chapter 4, which contains the environmental analysis of the proposed projects. To varying degrees, the following alternatives would also avoid and/or lessen project impacts, including some or all of the unavoidable effects of the projects. Alternatives are provided for each of the proposed projects. The 2007 RSP EIR evaluated four alternatives: No Project/No Development, No Project/ General Plan Buildout, Reduced Density/Intensity and Water Supply Constrained. The alternatives evaluated for the RSPU mirror these alternatives, with the exception of Alternative 4. In addition, this SEIR evaluates alternatives to the specific projects that are analyzed in Chapter 4—the KP Medical Center, the MLS Stadium and the Stormwater Outfall. The 2007 RSP EIR did not evaluate project-specific components and therefore did not have alternatives focused on particular projects.

The alternatives that are evaluated are:

RSPU Alternatives

- Alternative 1: No Project/No Build: No new development occurs within the RSP Area.

- Alternative 2: No Project/No Action: The RSP Area is developed as provided for under existing land use designations and zoning, which are consistent with the 2007 RSP.

- Alternative 3: Reduced Density: Office, retail and commercial uses are reduced by 40 percent. The museum in the Central Shops, the MLS Stadium and the KP Medical Center Phase 1 hospital development are not reduced, but the retail space within the Central Shops and the Phase 2 medical office buildings are reduced by 40 percent.

KP Medical Center Alternatives

- Alternative 4: No Project/No KP Medical Center: The KP Medical Center is developed with the land uses identified for the Land Use Variant. No new medical center is developed within the RSP Area.

- Alternative 5: Reduced Medical Center: The hospital, hospital support building and medical office buildings are all reduced by approximately 30 percent. The hospital would have 280 beds, similar to the existing Morse Avenue facility. The Hospital Support Building would be reduced to 140,000 sf, and the Medical Office buildings would be reduced to 100,000 sf each, for a total of 200,000 sf.

MLS Stadium

- Alternative 6: No Project/No MLS Stadium: The MLS Stadium site is assumed to be developed with the land uses identified for the RSPU Land Use Variant**.** No MLS Stadium is developed.

- Alternative 7: Smaller Stadium: The stadium is reduced in size to a capacity for 18,000 ticketed attendees.

- Alternative 8: Relocated Railyards Stadium: The MLS Stadium is relocated to west of 7th Street, and the area located east of 7th Street is zoned R-5, to replace the residential and retail development from west of 7th Street**.** The number of units and square footage would not change; rather the stadium and the residential uses would be "flipped" across 7th Street.

- Alternative 9: Natomas MLS Stadium: A MLS Stadium with a ticketed capacity of 25,000 would be built at the site of the Sleep Train Arena. The site within the RSP Area that had been proposed for the stadium would be developed consistent with the Land Use Variant.

Stormwater Outfall

- Alternative 10: No Project/Stormwater Outfall: The Stormwater Outfall would not be built as described in the SEIR**.**

RSPU Alternatives

Four alternatives to the RSPU are evaluated, including the No Project alternatives. A comparison of land uses under the "build" alternatives is provided in **Table 6-2**.

TABLE 6-2.
RSPU ALTERNATIVES - COMPARISON OF LAND USES

Land Use	Proposed RSPU	Alternative 1 No Project/ No Development	Alternative 2 No Project/ No Action	Alternative 3 Reduced Density
Housing (units)	6,000 – 10,000	0	10,000 - 12,500	3,600
Office (sf)	2,757,027 - 3,857,027	0	0 – 2,828,200	2,314,216
Medical Office (sf)	510,000	0	0	306,000
Hospital Facilities (sf)	718,003	0	0	430,801
Retail (sf)	514,270	0	1,384,00	308,562
Flexible Mixed Use (sf)	771,405	0	491,000	462,843
MLS Stadium (attendee capacity)	25,000	0	0	25,000
Hotel (rooms/keys)	1,100	0	1,100	660
Historic & Cultural (sf)	485,390	0	485,390	363,234
Retail (sf)	162,525	0		97,515
Museum (sf)	180,000	0	187,830	180,000
Flex (sf)	142,865	0		85,719
Open Space (acres)	30	0	41.16	30

SOURCE: Downtown Railyard Venture, LLC, 2016.

Alternative 1: No Project/No Build Alternative

Description

The CEQA Guidelines require the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines section 15126.6(e)(1)). The No Project/No Build Alternative describes an alternative in which no development would occur in the RSP Area with the exception of the continued current use of the Sacramento Valley Station; office and retail uses in the adjacent Railway Express Annex (REA) building; parking lots that front on 7th Street between F and H Streets; and streets that were called for in the 2007 RSP, constructed following approval of the 2007 RSP, and will be opened in the coming months, including 5th and 6th Streets between H Street and Railyards Boulevard, as well as Railyards Boulevard from 7th Street to Bercut Drive. The site-specific conditions of the No Project/No Build alternative are best described by the existing conditions presented in the environmental setting sections in Chapter 4 of this Draft EIR.

Under the No Project/No Build Alternative, the City Council would not approve the project, and none of the mitigation measures identified within this Draft EIR would be implemented. The alternatives analysis must also describe conditions that could reasonably be expected to occur if the RSPU project is not approved. In this case, it is reasonable to assume that, if the

project is not approved, the project site would remain largely undeveloped, with the exception of the existing uses described above. Therefore, the impacts of the No Project/No Build Alternative would be identical to the existing conditions described in the settings of Chapter 4. Alternatively, if the RSPU project is not approved, the RSP Area could be redeveloped under current conditions consistent with the land use designations and allowable uses identified in the 2007 RSP and 2035 General Plan (see Alternative 2 below).

Comparative Analysis of Environmental Effects

Table 6-3 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed RSPU and Alternative 1.

Impacts Identified as Being the Same or Similar to the Proposed Project

Because no development would occur under Alternative 1, there would be no impacts that would be similar to the proposed RSPU.

Impacts Identified as Being Less Severe than the Proposed Project

Because no impacts would occur as the result of the No Project/No Build Alternative, all impacts would be inherently less severe than under the proposed RSPU. No mitigation would be required of this alternative.

Impacts Identified as Being More Severe than the Proposed Project

Alternative 1 would have no impacts that would be more severe than under the proposed RSPU, because there would be no changes within the RSP Area due to Alternative 1. Further, there are no existing conditions that could result in significant impacts if the RSPU is not developed. For example, the remediation of contaminated groundwater and soils would continue even if the RSP Area remains undeveloped.

Because the RSPU would be accommodating growth that would inevitably occur within the Sacramento region, there could be significant effects related to such development elsewhere in the region, and some effects could be more severe. To the extent that such development were more dispersed and less dense than the proposed RSPU, some impacts might be more significant. For example, if VMT increases, then impacts on air quality and greenhouse gasses would be more severe. Depending on location and the acreage that is disturbed, impacts on biological and cultural resources could increase if development is located elsewhere. However, it is not known where or what type of development would occur if the RSPU is not approved, so it would be speculative to provide a more definitive discussion of potential impacts.

Relationship to Project Objectives

None of the RSPU objectives would be realized under Alternative 1. Nor would any of the KP Medical Center or MLS Stadium objectives be realized under this alternative.

Alternative 2: No Project/No Action Alternative

Description

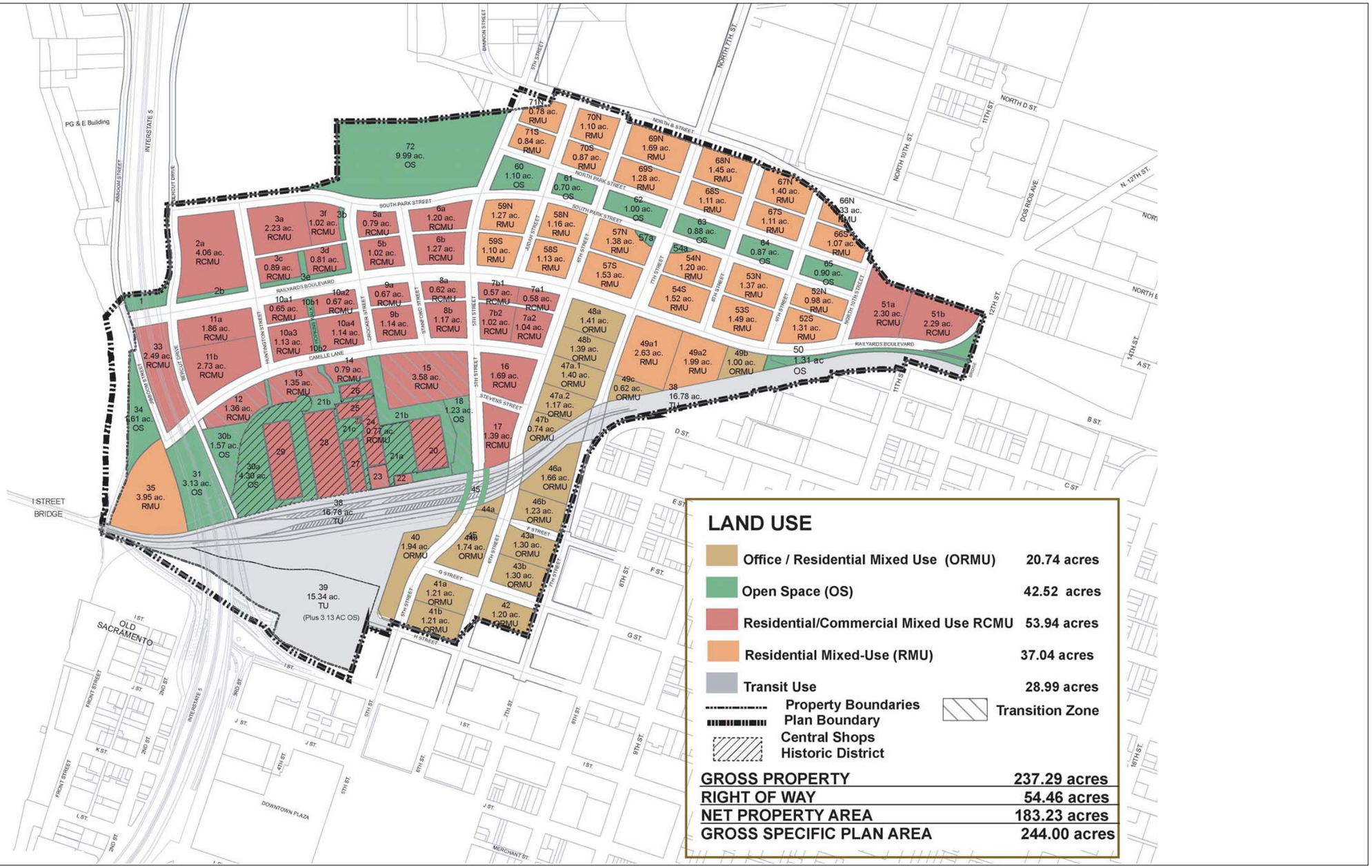
The No Project/No Action Alternative assumes that the RSP Area would be redeveloped under current conditions consistent with the land use designations and allowable uses identified in the 2007 RSP and 2035 General Plan (see **Figure 6-1**). For the most part, the types of uses (e.g., office, high density residential, historic/cultural) are very similar, although the number of units, square footage, distribution and mix of uses differ. In addition, there would be no a regional medical center under the 2007 RSP. The 2007 RSP did provide for a sports and entertainment center overlay, which could potentially be the site of a soccer stadium, although the overlay site is not located near the proposed MLS Stadium site.

Table 6-2 compares the square footage and unit count for this alternative and the proposed RSPU. In general, the amount of residential and office development could be higher under the No Action Alternative, while the amount of retail would be much higher (515,000 sf under the RSPU compared to 1.4 msf for the 2007 RSP). Land uses have also been redistributed in some cases. For example, the area bound by 7th and 10th Streets, Railyards Boulevard and the northern embankment is designated residential/mixed use (allowing retail and neighborhood office, but not other office uses) in the 2007 RSP, but C-3 in the 2016 RSPU, which allows both residential and high rise office.

A number of elements would be very similar. The Central Shops District would have a similar amount of development (approximately 485,000 sf) with historic/cultural, retail, entertainment and office uses. Both the 2007 RSP and 2016 RSPU provide for an approximately 10-acre park in the northwest corner of the RSP Area. The assumed uses in the Transit Zone, such as the intermodal facility would be identical. The backbone infrastructure would be similar, with some variation in the street layout. Several roads have already been constructed along the alignments identified in the 2007 RSP, including Railyards Boulevard and the extensions of 5th and 6th Streets. The railroad tracks have also been relocated to the current alignment as called for in the 2007 RSP. Like the 2016 RSPU, this alternative would also have a conceptual location for a school, fire station and police substation.

Other key differences between the 2007 RSP and the 2016 RSPU include:

- The 2007 RSP included a Sports and Entertainment Facility Overlay on four blocks north of the rail line and on either side of 7th Street. The 2016 RSPU does not include this overlay, but does provide for the MLS Stadium farther north in the RSP Area, east of 7th Street.



SOURCE: Railyards Specific Plan EIR 2007.

Sacramento Railyards Specific Plan Update . 150286

Figure 6-1

Alternative 2 – No Project/No Action

- The 2007 RSP would manage stormwater flows with a cistern that would detain those flows, and discharge them to both the City's CSS and a new outfall on the Sacramento River. The 2016 RSPU does not include a cistern, and all stormwater would be discharged to the river through a new outfall.

- The 2016 RSPU anticipates both a new medical center and a soccer stadium. While these uses would be allowed in under the 2007 RSP, they were not anticipated in either the 2007 RSP nor the 2007 RSP EIR.

As shown in Table 6-2, the No Project/No Action Alternative allows for a maximum of 12,500 residential units (including 400 units in mixed-use flex), 2.9 million square feet of office uses (including 491,000 sf in mixed-use flex), 1.4 million square feet of retail uses, 491,000 sf of mixed-use flex space (which could be developed as 491,000 sf of office, retail, or other non-residential uses, or approximately 400 residential units, or some combination of these uses), 1,100 hotel rooms, 485,390 sf of historic and cultural uses, 41.2 acres of open space, 1.7 acres of utilities, and 9,700 parking spaces.

Comparative Analysis of Environmental Effects

Table 6-3 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed RSPU and Alternative 2. In order to provide a comparison to the propose RSPU impacts, this analysis considers the effects of the adopted 2007 RSP under existing conditions, rather than simply reiterating impact conclusions identified in the 2007 RSP EIR.

Impacts Identified as Being the Same or Similar to the Proposed Project

The acreage that would be developed under Alternative 2 would be almost identical to the proposed RSPU, and would include a stormwater outfall (although smaller than the proposed Stormwater Outfall), so impacts related to ground disturbance would be the same. Specifically, impacts would be the same for biological resources, including raptors and other protected species (Impacts 4.3-2 and 4.3-11), Valley elderberry longhorn beetle (Impacts 4.3-4 and 4.2-13), bat species (4.3-6 and 4.3-15), wetlands and riparian vegetation (Impacts 4.3-7), fish (Impact 4.3-8 and 4.3-17) and trees (4.3-9). Similarly, impacts on archaeological (Impacts 4.4-1 and 4.4-8) and paleontological resources (Impacts 4.4-7 and 4.4-10) would be unchanged, as would the risk of exposure to or interference with contaminated groundwater or soils during construction (Impact 4.8-1, 4.8-3, 4.8-4, 4.8-7, 4.8-8, 4.8-9).

The level of construction activity on a daily basis would also be similar to the proposed RSPU. Therefore, for both the RSPU and Alternative 2, short-term construction emissions would be significant even with mitigation (Impact 4.2-2), but cumulative construction emissions would be mitigable to a less-than-significant level (Impact 4.2-8).

The type of development that would occur would also use similar equipment, which could include pile driving. Because the same area would be developed, construction noise from Alternative 2 would have the same effect on existing and future residences and other sensitive users (Impacts 4.10-1, 4.10-4 and 4.10-6). Construction noise would continue to be a significant and unavoidable impact, even with mitigation.

Both the proposed RSPU and Alternative 2 would have high-rise buildings that could create disruptive amounts of glare if the buildings are sheathed in highly reflective surfaces (Impacts 4.1-4 and 4.1-8). However, in both cases, mitigation requiring low emission glass and limiting the use of highly-reflective glass surfaces would reduce the impact to a less-than-significant level.

The high-rise buildings that would be developed under either the proposed RSPU or Alternative 2 could also alter wind speeds in a manner that affects pedestrians (Impact 4.2-7). Because the number of buildings with heights in excess of 85 feet would likely be similar under either, this impact would be similar for the Alternative 2 and the proposed RSPU.

Impacts on the Central Shops and Water Tower would be similar, because both the RSPU and Alternative 2 allow for development in proximity to the shops, and with similar building heights (Impacts 4.4-2, 4.4-3 and 4.4-9). With mitigation, the impact would be less than significant. This includes the potential for damage due to dewatering (Impact 4.6-2) and vibration (Impact 4.10-5).

Both the RSPU and Alternative 2 would have residential buildings in proximity to the railroad tracks and Interstate 5 (I-5) (Impacts 4.10-5 and 4.10-7).

Both Alternative 2 and the proposed RSPU allow for a school to be located within the RSP, which could be a significant impact if the school were located within 1,500 feet of the railroad tracks (Impact 4.11-6). However, mitigation requiring an assessment of the suitability of any proposed school would reduce this impact to a less-than-significant level.

Alternative 2 could have more residential units than the proposed RSPU (10,000 to 12,500 du under Alternative 2 compared to 6,000 to 10,000 du under the RSPU). Therefore, the resulting demand for public services would be greater under Alternative 2. In most cases (fire, police, schools, libraries), the impacts would be less than significant. In the case of parks, Alternative 2 provides more open space but also would have a greater demand than the proposed RSPU—a demand for 286 total acres compared to a total demand of 182 acres under the proposed RSPU (Impacts 4.11-8 and 4.11-9). In both cases, mitigation would be required to ensure that the amount of park/open space would meet the City requirements.

Alternative 2 would result in a similar level of construction to the RSPU, so the potential for conflicts with construction traffic would be similar (Impacts 4.12-7 and 4.12-14). As with the RSPU, mitigation requiring a Construction Traffic Management Plan would reduce this impact to a less-than-significant level.

Impacts Identified as Being Less Severe than the Proposed Project

For the most part, the impacts on visual impacts would be similar between Alternative 2 and the RSPU, because both plans would introduce new, high density and high-rise buildings into an area that is largely undeveloped. In many cases, the new development would be more visually pleasing than existing conditions at the RSP Area, which is composed largely of mounds of excavated material and depressions. However, there are some aspects of the plans that where there would be differences in resulting views, as discussed below.

Both the RSPU and Alternative 2 would result in the development of a largely vacant site with large-floor plate and high-rise buildings. Both the proposed RSPU and the 2007 RSP allow for unlimited building heights in some areas, and specify building heights in others (see Figure 3-18 of the 2007 RSP Draft EIR and Figure 2-8 of the RSPU Draft EIR). The 2007 RSP restricts heights in the areas immediately north and east of the Central Shops to 85 feet (and in one spot, 120 feet), while the proposed RSPU allows street-wall heights of 65 to 85 feet in this area. Under the RSPU, most residential neighborhoods are limited to 250 feet, with street-walls of 65 to 85 feet, while in the 2007 RSP, heights in the portions of the more residential neighborhood would be limited to 85 to 120 feet. For the most part, this type of high-density development is consistent with a downtown, and views of the RSP Area would be unchanged (the Central Shops) or improved under either Alternative 2 or the proposed RSPU. However, one area of concern has been identified. The area east of 7th Street between F Street and the UPRR tracks is a relatively low-density neighborhood, Alkali Flat. The proposed RSPU allows building heights of 120 feet along 7th Street between F Street and the tracks, with a maximum street-wall height of 65 feet. This is considered a significant impact that would be mitigated to a less-than-significant level by restricting street-wall height to 35 feet (Impact 4.1-1). The 2007 RSP already limits street-wall height to 35 feet in this area, so it would have a less-than-significant impact, and would not require mitigation. It should be noted that with mitigation, the impact would be similar.

Both the 2007 RSP and the proposed RSPU allow for buildings of up to 450 feet on the land between I-5 and the Sacramento River. The 2007 RSP EIR concluded that this was a less-than-significant impact, in part because the 2007 RSP Design Guidelines would ensure the creation of slender towers with sufficient separation to maintain through-views to the river from I-5. The proposed RSPU Design Guidelines would allow for a bulk and height that could be in conflict with the riverfront, and could reduce visual access to the river at both the pedestrian and I-5 levels (Impacts 4.1-2 and 4.1-6). This is considered a significant impact, but one that could be lessened to a less-than-significant level by limiting heights within 80 feet of the River

to 35 feet. As shown in Figure 3-19 of the 2007 RSP Draft EIR, Alternative 2 would limit heights within 160 feet of the River to 35 feet. For these reasons, Alternative 2 would have less of an impact on views from the River than the proposed RSPU. It should be noted that with mitigation, the impacts would be similar.

Alternative 2 and the proposed RSPU would both result in new sources of light and glare within the RSP Area. Lighting could be disruptive to night-time activities in nearby neighborhoods, particularly east of 7th Street (Impacts 4.1-3). Mitigation limiting the extent to which lighting is allowed to spillover would reduce most lighting impacts to a less-than-significant level for both the proposed RSPU and Alternative 2. However, the proposed RSPU also includes the MLS Stadium, which would emit light from its canopy through the opening in the roof, and would have extensive lighting for signage, security and other purposes. The stadium would be located in close proximity to existing residential neighborhoods, and even with mitigation, the increased lighting from the stadium would be considered a significant and unavoidable impact. Alternative 2 would not include a stadium, so its lighting impacts would be less severe than the proposed RSPU.

With mitigation, this impact would be less than significant for both. However, because Alternative 2 would have fewer jobs (approximately 16,524 employees compared to approximately 22,000 under the proposed RSPU) and more housing (10,000 to 12,500 units compared to 6,000 to 10,000 units under the 2007 RSP), emissions levels would be expected to be lower under Alternative 2. Similarly, Alternative 2 would be expected to generate emissions of NOx, PM10 and PM2.5 that exceed standards (Impacts 4.2-3 and 4.2-9), a significant and unavoidable impact, but at lower levels than the proposed RSPU.

Alternative 2 would generate approximately 88, 730 gross daily vehicle trips under existing conditions, of which 55,013 vehicle trips would be internal. In contrast, the RSPU would generate fewer gross daily trips, approximately 84,113, but more external vehicle trips, 57,281, than Alternative 2. Because Alternative 2 would have fewer external trips, the impacts on local roads and the freeways would be somewhat less severe under Alternative 2. Under cumulative conditions, the RSPU would also generate fewer daily trips, but substantially more AM peak hour trips (23%) and more PM peak hour trips (6.5%). As a result, Alternative 2 would result in fewer intersections operating at LOS E or F (Impacts 4.12-1 and 4.12-8), slight improvements in freeway operations (Impacts 4.12-2 and 4.12-9) and less vehicle queuing at I-5 offramps (Impacts 4.12-3 and 4.12-10). Nonetheless, Alternative 2 would still generate a substantial amount of traffic, so mitigation would be required for each of these impacts, and the impacts on offramps would remain significant and unavoidable.

Unlike the proposed RSPU, Alternative 2 would not include a soccer stadium. Therefore, impacts related to pedestrians traveling to the stadium (Impacts 4.12-6 and 4.12-13) would not occur.

Both the proposed RSPU and Alternative 2 would expose existing and future sensitive receptors to similar levels of noise from traffic, loading docks, HVAC systems and other stationary sources (Impacts 4.10-2, 4.10-3 and 4.10-9) in some cases in excess of City standards. With mitigation, these impacts would be less than significant. However, the proposed RSPU includes the MLS Stadium, which would generate noise from crowds and amplified systems that could not be mitigated to a less-than-significant level (Impacts 4.10-2 and 4.10-9). Alternative 2 would not include an open-air stadium, so its impacts would be less than significant with mitigation, and the noise impacts would be less severe than under the proposed RSPU.

Impacts Identified as Being More Severe than the Proposed Project

Because of the greater number of residential units, Alternative 2 would have a higher water demand than the proposed RSPU (approximately 2,107 to 2,186 afy compared to 1,871 to 2,278 afy). While this demand could be met under existing conditions, under cumulative conditions there could be times when total City water demand would exceed its available treated supply (Impact 4.13-7). This impact would be slightly more severe under Alternative 2, due to the higher demand.

Relationship to Project Objectives

Alternative 2 would meet most of the RSPU project objectives, because it would contain a similar mix of uses (with the exception of the MLS Stadium and the KP Medical Center). Alternative 2 would develop the Railyards with transit-oriented, mixed-use development, and could promote a 24-hour urban village with a range of complementary uses (e.g., retail, office, hospitality, educational) and a mix of housing types. This development would be integrated into the existing Central City through the extension of roads, bike paths and pedestrian facilities, and would connect to the Sacramento River waterfront. Alternative 2 would provide a transportation corridor that accommodates a variety of transportation modes, and would complement and support the Sacramento Valley Station and the Sacramento Intermodal Transit Facility. The Central Shops would be used as a community resource, including a museum and tourist-oriented retail uses.

Alternative 2 would not provide health care-oriented development, and would not promote downtown development to the extent that the RSPU would, because Alternative 2 would not have two of the major regional draws—the KP Medical Center and the MLS Stadium. In addition, Alternative 2 would not meet any of the objectives of the KP Medical Center or the MLS Stadium.

Alternative 3: Decreased Density/Intensity Alternative

Description

The purpose of Alternative 3, Decreased Density/Intensity, is to reduce those impacts associated with the level of development that would occur within the RSP Area. By reducing

the number of residential units and the square footage for retail, commercial and other uses, the resident, employee and visitor population within the RSP Area would drop, resulting in a reduction in the number of vehicles associated with RSP Area development, and the associated levels of air emissions and traffic noise. The demand for public and utility services would also be reduced.

The Decreased Density/Intensity Alternative would retain the same distribution of land uses, but would reduce the total amount of development that would be allowed within the RSP Area. Under this alternative, there would be a 40 percent reduction in residential, office and retail uses. As shown in Table 6-2, the number of residential uses would be reduced to 3,600 to 6,000 units, office would be reduced to 2.3 msf, and retail uses would be reduced from 514,000 to 308,000 sf. The number of hotel rooms would be reduced to 660. Flex space and office and retail uses within the Central Shops District would also be reduced by 40 percent. The KP Medical Center Phase 2 medical office buildings would also be reduced in size. Several components of the proposed projects would be unchanged, including:

- The size and layout of the Kaiser Permanente Medical Center would remain the same as proposed; however, the Phase 2 medical office buildings would be reduced in size by 40 percent in order to reduce peak hour trip generation associated with these offices, while maintaining the number of in-patient hospital beds.
- The MLS Stadium would remain the same.
- The roadway system and other infrastructure would not change.
- The museum would remain 180,000 sf.

Comparative Analysis of Environmental Effects

Table 6-3 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 3.

Impacts Identified as Being the Same or Similar to the Proposed Project

The acreage that would be developed under Alternative 3 would be similar to the proposed RSPU, so impacts related to ground disturbance would be the same. Specifically, impacts would be the same for biological resources, including raptors and other protected species (Impacts 4.3-2 and 4.3-11), Valley elderberry longhorn beetle (Impacts 4.3-4 and 4.2-13), bat species (4.3-6 and 4.3-15), wetlands and riparian vegetation (Impacts 4.3-7), fish (Impact 4.3-8 and 4.3-17) and trees (4.3-9). Similarly, impacts on archaeological (Impacts 4.4-1 and 4.4-8) and paleontological resources (Impacts 4.4-7 and 4.4-10) would be unchanged, as would the risk of exposure to or interference with contaminated groundwater or soils during construction (Impact 4.8-1, 4.8-3, 4.8-4, 4.8-7, 4.8-8, 4.8-9).

Because the amount of impervious surface to be developed would not change, Alternative 3 would have the same effect on localized flooding as the proposed RSPU (Impacts 4.9-3 and 4.13-2). Mitigation Measure 4.13-2 would be required of both Alternative 2 and the proposed RSPU to reduce this impact to a less-than-significant level.

Like the proposed RSPU, Alternative 3 would result in fairly high-density development, which would alter the existing character of the RSP Area. For the most part, the new development would be consistent with the character of the downtown, and with the direction of relevant plans, policies and guidelines. However, under either the proposed RSPU or Alternative 3, the street-walls along 7th Street adjacent to the Alkali Flat neighborhood could be tall enough that they would reduce views, sky access and sunlight in the neighborhood (Impact 4.1-1). This impact would be less than significant with mitigation limiting the street-walls in this area to 35 feet.

Impacts on the Central Shops would be similar, because Alternative 3 would allow for development in proximity to the shops, and with similar building heights (Impacts 4.4-2, 4.4-3 and 4.4-9). With mitigation, the impact would be less than significant. This includes the potential for damage due to dewatering (Impact 4.6-2) and vibration (Impact 4.10-4).

Under Alternative 3, as with the proposed RSPU, a school could be located within the RSP Area, which would be a significant impact if the school were located within 1,500 feet of the railroad tracks (Impact 4.11-6). However, mitigation requiring an assessment of the suitability of any proposed school would reduce this impact to a less-than-significant level.

Because Alternative 3 includes the 25,000-capacity MSL Stadium, the potential for pedestrian impacts would be unchanged (Impacts 4.12-6 and 4.12-13), and the same mitigation, requiring an Event Traffic Management Plan would be required.

Impacts Identified as Being Less Severe than the Proposed Project

Under Alternative 3, the level of construction activity on a daily basis would be similar to the proposed RSPU, and the area to be graded would be the same. Therefore, short-term construction emissions would be significant (Impact 4.2-2), but cumulative construction emissions would be mitigable to a less-than-significant level (Impact 4.2-8). The severity of this impact would be reduced, because Alternative 3 develop over a shorter period of time and develop less square footage.

The type of development that would occur would also use similar equipment, which could include pile driving. Because the same area would be developed, construction noise from Alternative 3 would have a similar effect on existing and future residences and other sensitive users (Impacts 4.10-1 and 4.10-6). However, the period of construction would be shorter because less square footage would be developed.

Like the proposed RSPU, Alternative 3 would allow for buildings of up to 450 feet on the land between I-5 and the Sacramento River, although it is less likely that buildings would be this tall under Alternative 3 due to the reduction in square footage (Impacts 4.1-2 and 4.1-6). This is considered a significant impact, but one that could be lessened to a less-than-significant level by limiting heights within 80 feet of the River to 35 feet and complying with the bulk and massing requirements of the Central City Urban Design Guidelines Central Core Guidelines.

Alternative 3 would result in new sources of light and glare within the RSP Area. Lighting could be disruptive to night-time activities in nearby neighborhoods, particularly east of 7th Street (Impacts 4.1-3). Mitigation limiting the extent to which lighting is allowed to spillover would reduce most lighting impacts to a less-than-significant level for both the proposed RSPU and Alternative 3, and this impact would be less severe than under the RSPU because there would be less development. However, Alternative 3 also includes the MLS Stadium, which would emit light from its canopy through the opening in the roof, and would have extensive lighting for signage, security and other purposes. The stadium would be located in close proximity to existing residential neighborhoods, and even with mitigation, the increased lighting from the stadium would be considered a significant and unavoidable impact under Alternative 3 as well as the proposed RSPU.

Buildings developed under Alternative 3 would likely smaller and shorter than those of the proposed RSPU due to the reduction in units and square footage. Nonetheless, buildings could be tall enough to create disruptive amounts of glare if the buildings are sheathed in highly reflective surfaces (Impacts 4.1-4 and 4.1-8). Mitigation requiring low emission glass and limiting the use of highly-reflective glass surfaces would reduce the impact to a less-than-significant level for both Alternative 3 and the proposed RSPU.

Similarly, Alternative 3 could have high-rise buildings that would alter wind speeds in a manner that affects pedestrians (Impact 4.2-7). Because the number of buildings with heights in excess of 85 feet would likely be fewer than under the proposed RSPU, this impact would be less severe for Alternative 3.

Alternative 3 would result in a substantial reduction in external vehicle trips (relative to the RSPU). This would result in generally improved operations on study roadways, and fewer or less severe circulation impacts. For example, under existing conditions, Alternative 3 would result in 13,300 average daily trips (ADT) on the segment of 7th Street from south of Railyards Boulevard to F Street, down from 17,800 ADT under existing plus RSPU conditions. This represents a reduction of 4,500 daily trips, which is an approximate 25 percent reduction in trips added to this segment. The impacts on local intersections (Impacts 4.12-1 and 4.12-8) would vary based on location, because the KP Medical Center and MLS Stadium would not be reduced in size. Traffic on the freeway (Impact 4.12-2 and 4.12-9) and queuing at I-5 ramps (Impacts 4.12-3 and 4.12-10) would likely continue to be significant. Mitigation Measures 4.12-1 and 4.12-8, which require implementation of an Event Transportation Management Plan,

payment of fees toward the I-5 Subregional Corridor Mitigation program (SCMP), transportation demand measures, roadway improvements and other measures, would still be required of Alternative 3 to reduce impacts on intersections, freeway operations and I-5 offramps. However, some elements of the mitigation measures may not be required of Alternative 3.

Because Alternative 3 would result in less construction than the RSPU, there would be less potential for conflicts with construction traffic (Impacts 4.12-7 and 4.12-14). Nonetheless, the impact would be significant because a substantial amount of construction would occur, and mitigation requiring a Construction Traffic Management Plan would be needed to reduce this impact to a less-than-significant level.

Alternative 3 development would generate air emissions from traffic and energy use. The level of air emission would be lower than under the proposed RSPU due to the 40 percent reduction in residential, retail and office development. However, Alternative 3 would generate air pollutants at levels that could impede attainment of the federal 8-hour ozone standard (Impacts 4.2-1). With mitigation, this impact would be less than significant. Similarly, Alternative 2 would be expected to generate emissions of NOx, PM10 and $PM_{2.5}$ that exceed standards (Impacts 4.2-3 and 4.2-9), a significant and unavoidable impact, but at lower levels than the proposed RSPU.

Alternative 3 would have fewer residential units than the proposed RSPU (3,600 compared to 6,000 to 10,000 du under the RSPU). Therefore, the resulting demand for public services would be reduced under Alternative 3. In most cases (fire, police, schools, libraries), the impacts would be less than significant for both Alternative 3 and the RSPU. In the case of parks, Alternative 3 would provide the same amount of park/open space but with lower demand—109 acres compared to 182 to 273 acres under the proposed RSPU (Impacts 4.11-8 and 4.11-9). In both cases, because the demand for parkland would exceed the amount provided within the RSP Area, mitigation would be required to ensure that the amount of park/open space would meet the City requirements.

Alternative 3 would expose existing and future sensitive receptors to noise from traffic, loading docks, HVAC systems and other stationary sources (Impacts 4.10-2, 4.10-3 and 4.10-9) that would in some cases be in excess of City standards. In particular, traffic noise levels along 7th Street would be reduced enough that City standards could be met, which would not be the case under the proposed RSPU. Alternative 3 could also have residential buildings in proximity to the railroad tracks and I-5 (Impacts 4.10-5 and 4.10-7). With mitigation, these impacts would be less than significant, and less severe than the RSPU because the amount of residential, retail and office development would be less. Noise from the MLS Stadium crowds and amplified systems would occur under both the RSPU and Alternative 3, and would be significant and unavoidable even with mitigation. However, because Alternative 3 would meet City standards for traffic noise, the severity of the noise impacts would be reduced relative to the RSPU.

Alternative 3 would generate a lower demand for water—approximately 1,198 afy compared to 1,871 to 2,278 afy under the RSPU. While this demand is lower than the proposed RSPU, and could be met under existing conditions, under cumulative conditions there could be times when total City 8would exceed its available treated supply (Impact 4.13-7). This impact would be less severe under Alternative 3, due to the lower demand.

Impacts Identified as Being More Severe than the Proposed Project

No impacts were identified that would be more severe under Alternative 3 than under the proposed RSPU.

Relationship to Project Objectives

Alternative 3 would meet most of the project objectives, because it would contain a similar mix of uses, including the MLS Stadium and the KP Medical Center. For example, Alternative 3 would develop the Railyards with transit-oriented, mixed-use development, and could promote a 24-hour urban village with a range of complimentary uses (e.g., retail, office, hospitality, health care, educational) and a mix of housing types. This development would be integrated into the existing Central City through the extension of roads, bike paths and pedestrian facilities, and would connect to the Sacramento River waterfront. A transportation corridor that accommodates a variety of transportation modes and complements the Sacramento Valley Station and the Sacramento Intermodal Transit Facility would be developed. The Central Shops would be used as a community resource, including a museum and tourist-oriented retail uses. Alternative 3 would also promote downtown development by providing the major regional draws, specifically the KP Medical Center and the MLS Stadium. However, the extent to which objectives are related to the level of development (e.g., creating a vibrant, transit-oriented 24-hour development) could be less under Alternative 3 because there would be fewer residential units and less retail and office development. Further, the KP Medical Center objectives would not be fully realized due to the reduction in the size of the MOBs. For example, the KP Medical Center would not maximize efficiency, because some medical office uses would need to be located at a distance from the hospital, and would not be able to offer an expansion of advance medical services or accommodate the demands of future growth in membership. That growth would then have to be accommodated elsewhere in the region or City, resulting in additional environmental impacts, and a decrease in the efficiency gained my having a consolidated medical center with substantial medical office space.

This alternative would meet all of the objectives of the proposed MLS Stadium.

KP Medical Center Alternatives

Alternative 4: No Project/No KP Medical Center

As discussed above, typically there are two types of "No Project" alternatives. The first assumes that no changes occur at the project site, so that the existing conditions are maintained. The second No Project alternative considers what could be expected to happen given existing zoning and reasonably foreseeable changes. For the KP Medical Center, under a No Project/No Build alternative, the existing site conditions would remain. That is, the site would remain undeveloped in close to its current state. Some additional grading could be undertaken in order to complete remediation activities, but then no additional changes would occur. The outcome of the No Project/No Build alternative is described in the existing conditions sections of Chapter 4 and in Alternative 1 for the RSPU.

For the "No Project/No Action" alternative, it is assumed that the RSPU would be developed, but with a different set of land uses in the area zoned as the Hospital Special Planning District (SPD) under the proposed project. Typically, the existing zoning for the site would be assumed to be developed in a "No Project/No Action" alternative. In this case, it is assumed that the RSPU would move forward without the KP Medical Center. Therefore, the land uses assumed under the Land Use Variant in Chapter 2 are assumed to be developed under this alternative. For this alternatives analysis, it is assumed that the approximately 17.8-acre site within the Railyards would remain zoned H SPD, which allows for office uses and conditionally allows residential uses (with a Conditional Use Permit), and the land uses would be those described for the Land Use Variant in Chapter 2. The following uses are assumed to be developed within the KP Medical Center site:

- Office: 921,002 sf
- Retail: 92,100 sf
- Flex: 138,150 sf
- Residential: 250 dwelling units

It should be noted that these land uses are also allowed under the current zoning. The Residential/Commercial Mixed Use, allows for up to 250 dwelling units per acre and a maximum FAR of 8.0. The above mix of land uses would require a minimum of 6.3 acres, which could easily be accommodated on the approximately 17.8-acre site.

A total of approximately 5,804 employees would be generated by Alternative 4.

The street system would be similar to the proposed KP Medical Center, except that Huntington Street would be extended between Railyards Boulevard and South Park Street. Utilities would

also be similar, with main water and storm drain lines in Railyards Boulevard, Bercut Street, South Park Street and 5th Street, and main sewer lines in Railyards Boulevard and 5th Street.

Under this alternative, Kaiser would continue to operate its Sacramento Medical Center at the Morse Avenue location in unincorporated Sacramento County. The Morse Avenue facility offers a full hospital, inpatient and ambulatory surgical services, medical offices, emergency services, pharmacy, and other related healthcare services and administrative functions. However, as discussed previously, in order to continue using the Morse Avenue facility, seismic retrofits would be required to meet State requirements. At the same time, other changes would be required to meet code requirements, such as increasing the size of hospital rooms. As a result, the number of beds available within the existing facility would be reduced from 283 beds to approximately 70 beds, requiring a large addition and/or new facilities in order to maintain existing service levels.

Table 6-4 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 4.

Impacts Identified as Being the Same or Similar to the Proposed Project

Those impacts that are the result of ground disturbance would be the same for the proposed KP Medical Center and Alternative 4, because the same area would be disturbed by construction. Therefore, all biological and cultural resource impacts (Impacts 4.3-2, 4.3-11, 4.4-1, and 4.4-7, 4.4-8 and 4.4-10) would be the same, as would the risk of exposure to contaminated soils or groundwater during construction (Impact 4.8-7). Other construction-related noise (Impacts 4.10-1 and 4.10-6) and vibration impacts (Impacts 4.10-4 and 4.10-7) would also be similar, as would construction-related air emissions (Impacts 4.2-2 and 4.2-8).

As discussed on pages 4.2-33 and 4.2-34, the Land Use Variant would have similar vehicle miles traveled (VMT) to the proposed RSPU, indicating that replacing the KP Medical Center with residential and commercial development would not substantially alter air emissions. Operational emissions would generally be lower under Alternative 4 than under the proposed KP Medical Center, as indicated by a comparison of the emissions from the RSPU and the Land Use Variant (see Tables 4.2-18, 4.2-19 and 4.2-20). Therefore, Alternative 4 would have a reduced impact on air emissions (Impact 4.2-3), including the contribution to cumulative increases in air emissions (Impact 4.2-9). These impacts would remain significant and unavoidable even with implementation of Mitigation Measure 4.2-1, which requires implementation of the *Air Quality Management Plan* found in Appendix C.2.

If residential and/or commercial development on the KP Medical Center site were arranged in buildings that exceed 85-feet, they could have the potential to cause hazardous wind conditions for pedestrians (Impact 4.2-7). Mitigation is available to reduce this impact to a less-than-significant level through testing and design.

Traffic from the KP Medical Center would not exceed City noise levels, but certain stationary sources could, including HVAC systems and loading docks (Impact 4.10-2). Alternative 4 would include these same noise sources. Noise sources associated with the KP Medical Center specifically, ambulance sirens and helicopters, would not be significant. With mitigation, the impacts of stationary noise sources would be less than significant, and the noise created by Alternative 4 would be similar to the proposed KP Medical Center.

The area and amount of construction would be similar, so construction traffic impacts would be the same (Impacts 4.12-7 and 4.12-14).

Impacts Identified as Being Less Severe than the Proposed Project

Traffic impacts would be similar to the proposed KP Medical Center, and the same intersections (Impacts 4.12-1 and 4.12-8), freeway operations (Impacts 4.12-2 and 4.12-9) and I-5 offramps (Impacts 4.12-3 and 4.12-10) would be affected. However, the magnitude of these impacts would be reduced, because Alternative 4 would generate 11 percent fewer trips than the proposed KP Medical Center. For example, Alternative 4 would generate 1,850 gross unadjusted trips in the AM peak hour and 2,260 in the PM peak hour. In contrast, the KP Medical Center would generate 2,056 trips in the AM peak hour and 2500 in the PM peak hour. Alternative 4 would have internalized trips and a greater non-automobile mode split due to the mix of land uses. Nonetheless, this reduction in trips would not be enough to avoid impacts on intersections and the freeway, so mitigation would still be required.

Impacts Identified as Being More Severe than the Proposed Project

The residential, office and retail development associated with Alternative 4 would generate a demand for water of approximately 283 afy, compared to 219 afy for the proposed KP Medical Center. Therefore, Alternative 4 would contribute more toward cumulative demand for water supply (Impact 4.13-7), which is a significant and unavoidable cumulative impact.

Relationship to Project Objectives

Alternative 4 would not meet any of the KP Medical Center objectives, because it would not construct a new medical center campus in downtown Sacramento. In addition, Alternative 4 would not meet certain RSPU objectives, such as providing for a range of complimentary uses that include health care, and providing sufficient land, entitlements, and regulatory provisions to support the development of a Kaiser Permanente regional medical center.

Alternative 5: Reduced Medical Center

Alternative 5 would replace the Morse Avenue facility, and would include an expansion beyond the existing services offered at Morse Avenue. Under Alternative 5, approximately 280 beds would be provided in the hospital. This size hospital would be large enough to replace the Morse Avenue facility, which currently has 287 beds. Other facilities would be reduced by a commensurate amount, so that Alternative 5 would be approximately two-thirds the size of the

proposed KP Medical Center project. The Hospital Support Building (HSB) would be reduced from 210,000 sf to 140,000 sf. Similarly, only 200,000 sf of medical office buildings uses would be constructed, along with 2,440 parking spaces in parking garages. The Central Utility Plant would also be reduced by approximately one-third. A helistop would be located immediately west of the hospital building.

Alternative 5 would occupy the same blocks as the KP Medical Center project, bounded by South Park Street on the north, Bercut Street on the west, Railyards Boulevard on the south and 5th Street on the east. The footprint of the various structures would be similar, so the reduction in beds and square footage would be reflected primarily in building height. The hospital would be 10 floors in height, compared to 14 floors for the proposed KP Medical Center project. The medical office buildings would be 4 stories tall, rather than 6 stories. The western garage would be 5 levels, with 1 level below grade. The eastern garage would have 8 levels, with one below grade.

The roadway system for Alternative 5 would be the same as for the proposed KP Medical Center project. Access to the hospital would be provided from Railyards Boulevard, with access to the garage from Railyards Boulevard and Bercut Street. Utilities lines would also be similar, with the main water and stormwater lines in Railyards Boulevard, 5th Street, South Park Street and Bercut Street. Main sewer lines would be located in Railyards Boulevard and 5th Street. The hospital would have a central utility plant (CUP), which could be smaller than the 60,000 sf plant proposed for the project. The CUP would be located on a 20,000 sf site near the southeast corner of South Park Street and Bercut Drive.

Under Alternative 5, there would be approximately 2,830 employees at the KP Medical Center site, compared to the 4,465 employees at the proposed KP Medical Center.

While Alternative 5 would replace the Morse Avenue facility, it would not provide for any growth in membership and/or expansion of services as provided for by the proposed KP Medical Center. Therefore, it would not serve as a regional medical center to the extent that the proposed KP Medical Center would.

Table 6-4 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 5.

Impacts Identified as Being the Same or Similar to the Proposed Project

Under Alternative 5, the hospital and medical buildings would be reduced in height, but the overall project would maintain a very similar footprint. Therefore, impacts resulting from ground disturbance would be the same as the proposed KP Medical Center project. This would include all biological and cultural resource impacts (Impacts 4.3-2, 4.3-11, 4.4-1, and 4.4-7, 4.4-8 and 4.4-10), as well as the risk of exposure to contaminated soils or groundwater during construction (Impact 4.8-7).

Impacts Identified as Being Less Severe than the Proposed Project

Construction-related noise and vibration impacts (Impacts 4.10-1, 4.10-4, 4.10-6 and 4.10-7) would be similar to the proposed KP Medical Center on a day-to-day basis, but the duration of these construction activities would be reduced due to the reduced amount of square footage to be developed. Similarly, overall construction emissions would be reduced, although daily emissions would be similar (Impact 4.2-2 and 4.2-8).

Operational emissions would be reduced under Alternative 5, because the number of hospital beds and office square footage would be reduced by approximately one-third. This would mean that there would be less energy used, and approximately 1,635 fewer employees than under the proposed KP Medical Center, which would correspond to a reduction in traffic and traffic-related air emissions (Impacts 4.2-3 and 4.2-9). These impacts would remain significant and unavoidable even with implementation of Mitigation Measure 4.2-1, which requires implementation of the *Air Quality Management Plan* found in Appendix C.2.

Under Alternative 5, buildings would be reduced in height, but at 10 stories, the hospital building could still alter wind speeds at ground level, affecting pedestrians (Impact 4.2-7). As with the proposed project, mitigation would reduce this impact to a less-than-significant level.

Traffic from the KP Medical Center would not exceed City noise levels, but certain stationary sources could, including HVAC systems and loading docks (Impact 4.10-2). Under Alternative 5, there would be fewer of these noise sources, because of the reduction in beds and office space. Nonetheless, they would require mitigation to ensure that noise levels would be less than significant.

Alternative 5 would result in a reduction in external vehicle trips of approximately one-third compared to the KP Medical Center project. As a result, there would be less congestion at intersections (Impacts 4.12-1 and 4.12-8). Nonetheless, traffic impacts on intersections, freeway operations (Impact 4.12-2 and 4.12-9) and queuing at I-5 ramps (Impacts 4.12-3 and 4.12-10) would likely continue to be significant. Mitigation Measures 4.12-1 and 4.12-8, which require implementation of a Transportation Demand Management Plan, payment of fees toward the I-5 Subregional Corridor Mitigation program (SCMP), and specific roadway improvements would be required. However, the extent of improvements needed to offset Alternative 5 impacts may be less extensive than under the proposed KP Medical Center project.

Because Alternative 5 would result in less construction than the RSPU, there would be less potential for conflicts with construction traffic (Impacts 4.12-7 and 4.12-14). Nonetheless, the impact would be significant because a substantial amount of construction would occur, and mitigation requiring a Construction Traffic Management Plan would be needed to reduce this impact to a less-than-significant level.

Water demand for Alternative 5 would be approximately 121 afy, compared to 182 afy under the proposed KP Medical Center project. While water demand would be reduced, it would still be a considerable contribution to cumulative increases in water demand, even with mitigation (Impact 4.13-7).

Impacts Identified as Being More Severe than the Proposed Project

No impacts were identified as more severe than the proposed KP Medical Center. However, because Alternative 5 would provide only for the replacement of the Morse Avenue facility, Kaiser Permanente would need to build additional facilities elsewhere in the region to provide for membership growth. Depending on the location and size of such facilities, they could result in additional traffic, air quality, noise and related impacts.

Relationship to Project Objectives

Alternative 5 would partially achieve the KP Medical Center project objectives by replacing the Morse Avenue facility with a seismically safe, up-to-date facility. However, because Alternative 5 would only provide for replacement, it would not have the flexibility to respond to evolving health care needs of KP members, provide capacity for long-term growth and development, nor allow for the provision of new advanced medical services beyond those currently provided at the Morse Avenue facility. In addition, because new facilities would need to be located elsewhere, there would be less opportunity for comprehensive planning for medical services and the efficiencies captured by the consolidation of those cervices at one location. Additionally, those new facilities at other locations would have their own environmental impacts. The Alternative 5 hospital would help transform downtown Sacramento into a commercial and community hub by diversifying the resources available within the downtown to include more medical facilities, but to a lesser extent than the proposed KP Medical Center project. Similarly, Alternative 5 would meet the RSPU project objectives to provide a range of uses, including health care, and to support the development of a Kaiser Permanente regional medical center, but to a lesser extent than the proposed KP Medical Center, for the reasons stated above. Further, because fewer of the KP medical services would be located in the RSP Area, this Alternative would not support the RSPU objectives to promote downtown development that is a regional draw to the extent that the proposed KP Medical Center would.

MLS Stadium Alternatives

Alternative 6: No Project/No MLS Stadium

Under this alternative, the MLS Stadium would not be built within the RSP Area. As a result, there would be no professional outdoor soccer team in Sacramento. As discussed earlier, a “No Build” alternative would assume that the MLS Stadium site would remain undeveloped and that the only changes that would occur would be related to finalizing remediation of the site. The conditions described in Chapter 4 settings and Alternative 1 would continue.

For a "No Action" alternative, land uses are typically based on existing uses. In this case, because it is assumed that the RSPU would be implemented on the remainder of the site, it is assumed that the land uses identified in the Land Use Variant in Chapter 2 would be developed on the stadium site, including:

- Residential: 750 units
- Retail: 30,700 sf
- Flex Space: 46,050 sf

The above uses are also consistent with the existing zoning of Residential Mixed Use, which allows up to 310 dwelling units per acre and a maximum FAR of 1.0. A minimum of 2.4 acres would be needed for the above residential uses and 1.76 acres for the retail and flex space uses. The stadium site is approximately 14 acres, which could accommodate these uses.

The roadway system would differ from the proposed MLS Stadium, because South Park Street, 8th Street and 9th Street would extend into the site to provide more circulation to the smaller blocks. Utilities would be similar, with main water and sewer lines in Railyards Boulevard, 7th Street and 10th Street, and storm drain lines in 7th Street and Railyards Boulevard.

A small park would be developed in the center of the site, and open space would continue to be provided along the embankment.

Comparative Analysis of Environmental Effects

Table 6-5 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 6.

Impacts Identified as Being the Same or Similar to the Proposed Project

Those impacts that are the result of ground disturbance would be the same for the proposed MLS Stadium and Alternative 6, because the same area would be disturbed by construction. Therefore, all biological and cultural resource impacts (Impacts 4.3-2, 4.2-11, 4.4-1, and 4.4-7, 4.4-8 and 4.4-10) would be the same, as would the risk of exposure to contaminated soils or groundwater during construction (Impact 4.8-7). Other construction-related noise and vibration impacts (Impacts 4.10-4 and 4.10-7) would be similar, although the severity may differ slightly depending on the layout of Alternative 6 development. For example, construction noise (Impacts 4.10-1 and 4.10-6) would be similar because both the proposed MLS Stadium and Alternative 6, for the most part, would use the same types of construction equipment. However, the severity of the impact would depend largely on the duration of construction activities in proximity to residential and other sensitive receptors. If the layout of Alternative 6 placed buildings farther from existing residential units than the MLS Stadium, then construction noise and vibration in those areas would be of somewhat shorter duration.

As discussed on pages 4.2-33 and 4.2-34, the Land Use Variant would have similar vehicle miles traveled (VMT) to the proposed RSPU, indicating that replacing the MLS Stadium with residential and retail development would not substantially alter air emissions (Impacts 4.2-3 and 4.2-9).

Impacts Identified as Being Less Severe than the Proposed Project

Operational emissions would generally be lower under Alternative 6 than under the proposed MLS Stadium, as indicated by a comparison of the emissions from the RSPU and the Land Use Variant (see Tables 4.2-18, 4.2-19 and 4.2-20). Therefore, Alternative 6's contribution to cumulative increases in air emissions would be lower than the proposed MLS Stadium (Impact 4.2-9). However, this cumulative impact would remain significant and unavoidable even with implementation of Mitigation Measure 4.2-9, which requires implementation of the *Air Quality Management Plan* found in Appendix C.2.

The RSP Area is largely undeveloped with only minimal sources of lighting. The MLS Stadium would introduce a variety of lighting, including illumination of surrounding plazas, street lighting, sidewalk lighting, building perimeter lighting and outdoor security lighting. Much of this lighting would be similar in visibility and distribution to lighting that would accompany high-density residential and retail development under Alternative 6 (Impact 4.1-3). However, Alternative 6 would not have large illuminated signs or the type of lighting that would be visible from the Stadium center or searchlights or other temporary lighting that could be used at events. Therefore, while the impact of new light under Alternative 6 would be significant, it would be less severe than for the MLS Stadium. Furthermore, mitigation is available to reduce lighting impacts to a less-than-significant level for residential and commercial uses, such as Alternative 6, but the lighting associated with the MLS Stadium would be a significant and unavoidable impact, even with mitigation.

Both the proposed MLS Stadium and the residential and commercial uses associated with Alternative 6 would have a variety of noise sources, including traffic, HVAC equipment and loading docks (Impacts 4.10-2, 4.10-3 and 4.10-9). Mitigation would reduce the noise from these sources to acceptable, less-than-significant levels for both interior and exterior noise. However, the MLS Stadium would also have amplified sound during events, primarily from the public address system, concert stage on the soccer field and stages outside of the Stadium in the plaza areas. Mitigation Measure 4.10-3, requiring that acoustical features be incorporated into the architecture and outdoor sound system of the MLS Stadium would lessen the noise, but City noise standards might still be exceeded, so the impact would remain significant and unavoidable. Therefore, the impacts on nearby sensitive receptors, particularly the neighborhoods to the south and southeast, would be more severe under the proposed MLS Stadium than under Alternative 6.

Alternative 6 would not result in traffic impacts in the pre-event PM peak hour (Impacts 4.12-1 and 4.12-8), or result in potential pedestrian access conflicts (Impacts 4.12-6 and 4.12-13). Mitigation would not be required of these impacts.

Impacts Identified as Being More Severe than the Proposed Project

Alternative 6 could bring new residents in proximity to the railroad tracks (Impact 4.10-2) and which generates noise in excess of City standards for residential uses, but mitigation requiring a 190-setback from the tracks would reduce this impact to a less-than-significant level**.** The MLS Stadium site is large enough to accommodate a 190-foot setback for residential uses. The MLS Stadium would not place residential units near the railroad tracks.

Unlike the MLS Stadium, residential and commercial development under Alternative 6 could be developed in high-rises with highly reflective surfaces (Impacts 4.1-4 and 4.1-8. This impact would be reduced to a less-than-significant level by limiting the expanse of highly reflective glass.

If residential and/or commercial development on the stadium site were arranged in buildings that exceed 85-feet, and therefore have the potential to cause hazardous wind conditions for pedestrians (Impact 4.2-7). Mitigation is available to reduce this impact to a less-than-significant level through testing and design.

Alternative 6 would include residential units, which would increase the demand for parks and recreational facilities (Impacts 4.11-8 and 4.11-9). With 750 units, and assuming 2.1 persons per household, Alternative 6 would have a population of 1,575 people. A small park would be provided at the center of the Alternative 6 development, but it would be less than one-acre in size. Mitigation requiring the provision of additional parks and/or recreational facilities and/or payment of in lieu fees would reduce this impact to a less-than-significant level.

Traffic congestion would be slightly more severe under Alternative 6 during the PM peak hour, so impacts on intersections (Impacts 4.12-1 and 4.12-8) and I-5 queuing (Impacts 4.12-3 and 4.12-10) would be more severe than under the proposed MLS Stadium. The same mitigation measures would be required of Alternative 6, and some additional facility improvements may be required.

The residential and commercial development associated with Alternative 6 would generate a demand for water of approximately 101 acre-feet per year (afy) compared to 7 afy for the MLS Stadium. This greater demand would contribute more towards the significant and unavoidable cumulative demand for additional water supply (Impact 4.13-7).

Relationship to Project Objectives

Alternative 6 would not achieve the objectives of the proposed MLS Stadium, because no new professional soccer stadium would be constructed. Further, Alternative 6 would not achieve RSPU project objectives related to providing a range of complementary uses that includes entertainment, promoting downtown development that is a regional draw for the City, and providing sufficient land, entitlements and regulatory provisions to support the development of a multi-purpose stadium that could accommodate a Major League Soccer franchise.

Alternative 7: Smaller Stadium

This alternative would reduce the size of the MLS stadium to 18,000 capacity, which is the same size as another professional soccer facility, Avaya Field in San Jose. Although the capacity would be reduced by 28 percent, the size of the building would not change substantially, because the size of the field could not be reduced and there would still need to be paved entryways and gathering spaces outside of and within the stadium.

The facilities at the Alternative 7 stadium would be essentially the same as for the 25,000-capacity stadium, but in some cases they would be smaller. For example, the seating bowl would be shorter and there would be fewer concessions. Some components would likely be similar in size, such as the field itself and team facilities and locker rooms. The reduction in square footage would result in a smaller footprint and a lower profile for the stadium. However, due to its location, it is unlikely that an additional, usable parcel could be created for non-stadium-related retail or other purposes. Therefore, this analysis assumes that Alternative 7 would use the entire area dedicated to the 25,000-capacity stadium, with any excess space dedicated to landscaping or plazas.

The smaller stadium is anticipated to host the same number of events as the proposed MLS Stadium; however, attendance levels would be reduced to the stadium's smaller size (see **Table 6-6**). Estimated attendance would range from 4,000 people at community events to 21,500 at concerts. As with the 25,000-capacity stadium, the 18,000-capacity stadium is assumed to have additional capacity for concerts, because the field could be used for attendees. Soccer-related events would have an expected attendance of 12,600 to 18,000 under Alternative 7, compared to 18,000 to 25,000 under the proposed MLS Stadium. On an average daily and annual basis, attendance would be approximately 30 percent lower under Alternative 7, compared to the 25,000-capacity MLS Stadium.

TABLE 6-6.
EVENT ATTENDANCE COMPARISON OF ALTERNATIVE 7 AND PROPOSED MLS STADIUM

	Proposed MLS Stadium 25,000-Ticketed Capacity			Alternative 7 18,000-Ticketed Capacity		
Event Type	**Event Daily Attendance**	**Average Annual Events**	**Annual Attendance**	**Event Daily Attendance**	**Average Annual Events**	**Annual Attendance**
MLS Regular Season	25,000	17	425,000	17,100	17	290,700
MLS Special Game(s)	20,000	1	20,000	14,400	1	14,400
MLS Playoff Game(s)	25,000	1	25,000	18,000	1	18,000
CONCACAF/Cup Games	17,500	2	35,000	12,600	2	25,200
U.S. National Team Matches	25,000	1	25,000	18,000	1	18,000
Other Soccer Events	18,000	3	54,000	12,600	3	37,800
Concerts - Tier I	27,000	2	54,000	21,250	2	42,500
Concerts - Tier II	18,000	5	90,000	12,500	5	62,500
Community Events	4,000	5	20,000	4,000	5	20,000
Total	**20,212**	**37**	748,000	14,253	**37**	529,100

SOURCE: Sacramento Soccer and Entertainment Holdings, Inc., 2016.

Employment levels would also be similar, although reduced due to the reduction in attendance levels. The permanent staff would need to include the same number of staff for management, maintenance, and ticket sales. Players, coaches, trainers and scouts are also considered in the permanent employee number, although they would only be at the stadium on event days. For this analysis, it is assumed that the permanent staff would not change. Temporary, event-day staff would be more dependent on attendance levels. Alternative 7 is estimated to require from 102 to 330 temporary staff on event days, including police, EMTs, security, stagehands and cleaning staff.

Comparative Analysis of Environmental Effects

Table 6-5 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 7.Impacts Identified as Being the Same or Similar to the Proposed Project

As discussed above, although the stadium size would be reduced under Alternative 7, the entire site bounded by Railyards Boulevard, 8th Street, North 10th Street and the embankment would be graded and then covered in building, roads, hardscape (e.g. plazas and planters), and landscaping. Therefore, those impacts that are the result of ground disturbance would be the same for the proposed MLS Stadium and Alternative 7. The impacts on biological and cultural resources (Impacts 4.3-2, 4.2-11, 4.4-1, and 4.4-7, 4.4-8 and 4.4-10) and the risk of exposure to contaminated soils or groundwater during construction (Impacts 4.8-7 through 4.8-9) would be the same or very similar.

Development on the stadium site, under either the proposed MLS Stadium or Alternative 7 could precede completion of the Stormwater Outfall, necessitating the use of onsite retention basins to collect storm drainage. If the capacity of these basins is exceeded, then localized flooding could occur (Impact 4.9-3 and Impact 4.13-2). This risk would be the same regardless of the capacity of the stadium.

Impacts Identified as Being Less Severe than the Proposed Project

Reducing the size of the stadium and the number of attendees would lessen a number of impacts. Construction-related noise and vibration impacts (Impacts 4.10-1, 4.10-4, 4.10-6 and 4.10-7) would be similar to the proposed 25,000-capacity stadium on a day-to-day basis, but the construction period would likely be shorter for the smaller, 18,000-capacity stadium, so the duration of these construction activities could be reduced. Nonetheless, because the same type of equipment would be used, and the smaller stadium would also be located in proximity to residential and other sensitive users, these impacts would remain significant and unavoidable under Alternative 7. Similarly, overall construction emissions would be reduced, although daily emissions would be similar (Impact 4.2-2 and 4.2-8).

Regardless of size, a new, open stadium would introduce a variety of lighting, including large illuminated signs, illumination of surrounding plazas, street lighting, sidewalk lighting,

building perimeter lighting and outdoor security lighting. Under Alternative 7, the amount of lighting could be reduced, but the potential for spill-over onto nearby residences and distractions to drivers, pedestrians and others would still occur (Impact 4.1-3). Therefore, while the impact of new light under Alternative 7 would be significant and unavoidable even with mitigation, it would be less severe than for the MLS Stadium.

The amount of air emissions under Alternative 7 would be reduced due to the 30 percent reduction in attendance. Similarly, Alternative 7 would contribute considerably to cumulative increases in air pollutant emissions, but at a lesser level than the proposed MLS Stadium (Impact 4.2-9). This cumulative impact would remain significant and unavoidable for both Alternative 7 and the proposed MLS Stadium, even with implementation of Mitigation Measure 4.2-9, which requires implementation of the *Air Quality Management Plan* found in Appendix C.2.

The Alternative 7 stadium, like the proposed MLS Stadium, would have a variety of noise sources, including traffic, HVAC equipment and loading docks (Impacts 4.10-2, 4.10-3 and 4.10-9). Mitigation would reduce the noise from these sources to acceptable, less-than-significant levels for both interior and exterior noise. Because there would be fewer people attending events, noise associated with the traffic and crowds would be reduced under Alternative 7. However, the proposed MLS Stadium, the 18,000-capacity stadium would have amplified sound during events, primarily from the public address system, concert stage on the soccer field and stages outside of the Stadium in the plaza areas. Mitigation Measure 4.10-3, requiring that acoustical features be incorporated into the architecture and outdoor sound system of the MLS Stadium would lessen the noise, but City noise standards might still be exceeded, so the impact would remain significant and unavoidable. Although Alternative 7 would have a similar effect related to amplified noise, it would reduce the magnitude of other noise sources, so operational noise impacts would be less severe under Alternative 7 than under the proposed MLS Stadium.

Alternative 7 would maintain the MLS Stadium in its current location, but reduce its maximum capacity from 25,000 to 18,000. The planned roadway, transit, bicycle, and pedestrian networks associated with this alternative would remain unchanged under baseline and cumulative conditions. Table 4.12-26 indicates that the proposed MLS Stadium (with 25,000 capacity) would generate 7,063 inbound vehicle trips and 235 outbound vehicle trips during the weekday pre-event (6:30 – 7:30 PM) peak hour. This alternative would generate 72 percent of these totals (5,085 inbound trips and 169 outbound trips) by virtue of its reduced capacity. Mode splits, vehicle occupancy levels, and arrival time characteristics would not be expected to materially change under this alternative.

This alternative would likely result in improved operations (versus the proposed MLS Stadium) at most study intersections and freeway facilities within the study area (Impacts 4.12-1 through

4.12-3 and 4.12-8 through 4.12-10. However, it is likely that many of the mitigation measures identified for the proposed MLS Stadium would also be necessary for Alternative 7. This would include widening of 7th Street from Railyards Boulevard to North B Street, new traffic signals at various locations within the RSP Area, new/expanded sidewalks and crosswalks, and an Event Transportation Management Plan (TMP) to accommodate vehicles, bicyclists, pedestrians, and transit during pre-event and post-event conditions. Impacts 4.12-3 and 4.12-10, queuing on I-5 offramps, would likely remain significant and unavoidable, even with mitigation, although the impact would be less severe under Alternative 7.

Because Alternative 7 would result in less construction than the RSPU, there would be less potential for conflicts with construction traffic (Impacts 4.12-7 and 4.12-14). Nonetheless, the impact would be significant because a substantial amount of construction would occur, and mitigation requiring a Construction Traffic Management Plan would be needed to reduce this impact to a less-than-significant level.

Water demand for the stadium is based on the capacity, so the smaller 18,000-capacity stadium would require less water than the proposed MLS Stadium (approximately 5 acre-feet per year (afy)) compared to 7 afy for the MLS Stadium. Although less than the MLS Stadium, this demand for water would contribute to the significant and unavoidable cumulative demand for additional water supply (Impact 4.13-7).

Impacts Identified as Being More Severe than the Proposed Project

None of impacts under Alternative 7 would be more severe than the proposed 25,000-capacity MLS Stadium. To the extent that Alternative 7 is more porous, noise leakage from the Stadium bowl could be exacerbated (Impacts 4.10-2 and 4.10-6).

Relationship to Project Objectives

Alternative 7 could meet some of the project objectives of bringing a state-of-the-art stadium and entertainment facility to RSP Area; it could provide a catalyst to development of the RSP Area and would be accessible by multiple modes of transportation. The ability of Alternative 7 to meet the basic objectives of the project such as serving as a catalyst and promoting major entertainment events could be limited by its size, with annual attendance reduced from 748,000 to 529,000. The smaller size of the stadium could also make it more difficult to achieve the objective of meeting MLS industry standards. Similarly, Alternative 7 would contribute to RSPU project objectives to a lesser extent than the proposed MLS Stadium, particularly those objectives related to providing a range of complementary uses that includes entertainment, promoting downtown development that is a regional draw for the City, and providing sufficient land, entitlements and regulatory provisions to support the development of a multi-purpose stadium that could accommodate a Major League Soccer franchise.

Alternative 8: Relocated Railyards Stadium

Under Alternative 8, a 25,000-capacity stadium would be constructed in the RSP Area, but at a different location. Given that approximately 14 contiguous acres are needed for the stadium, the only location with the appropriate dimensions within the RSP Area is located directly to the west of the proposed MLS Stadium site (see **Figure 6-2**). The Alternative 8 site would be bounded by 7th Street on the east, Railyards Boulevard on the south, 5th Street on the west and the embankment on the north. This alternative location would reduce impacts specific to the MLS Stadium, such as crowd noise and lighting, by moving the source of those impacts farther from the sensitive uses east of 7th Street and south of the RSP Area. The entrance to the Alternative 8 stadium and the associated plazas and stages would front 7th Street. As shown in Figure 6-2, there would be a strip of land to the west of the stadium, along 5th Street, that could be developed with commercial uses, similar to the land uses assumed to be located between 7th and 8th Streets for the proposed MLS Stadium site. Also as shown in Figure 6-2, the residential land uses that would be displaced by the relocated stadium would be moved to the former location, essentially swapped with the stadium. Therefore, the area bounded by 7th Street, North 10th Street, Railyards Boulevard and the embankment would be zoned R-5.

Because of this "swap," Alternative 8 is assumed to have the same number of dwelling units and non-residential square footage as would occur under the proposed MLS Stadium. The uses that could be developed on these sites are shown in **Table 6-7**.

TABLE 6-7.
COMPARISON OF DEVELOPMENT ON MLS STADIUM SITE AND R-5 RESIDENTIAL SITE

	MLS Site/C-3	R-5 Site
Dwelling Units	686	1,840
Retail	40,511 sf	108,529 sf
Flex-Retail	30,666 sf	0
Flex-Office	91,999 sf	0
Total Non-Residential	163,176 sf	108,529 sf
Stadium	25,000 capacity	0

The two sites are slightly different in size, which could affect the layout and design of the residential and commercial buildings. The current MLS Stadium/C-3 site is a total of 21 acres, including developable lots and open space. The stadium itself would occupy approximately 13.27 acres, and the residential and commercial development would occupy 6.89 acres. The R-5 Residential Site is composed of approximately 18.16 acres, including 17.03 acres of developable lots and 1.13 acres of open space. Under Alternative 8, the MLS Site/C-3 development program would need to occupy the 18.16-acre site. Assuming the stadium is the

same size, there would be approximately 4.89 acres available for the accompanying residential and commercial development, a reduction of 2 acres or about 30 percent the area available under the proposed MLS Stadium. The C-3 zone allows up to 450 dwelling units per acre and an FAR of 8.0, so the residential, retail and flex space could easily be accommodated on the smaller site. The current site of the proposed MLS Stadium is larger than the current area proposed for R-5 zoning, so that level of residential and retail development could be accommodated as well.

The roadway system would be altered to provide through access to the residential blocks east of 7th Street and 6th Street and Judah Street would not be extended north of Railyards Boulevard.

The Alternative 8 site is encumbered by an affordable and market rate housing covenant in favor of California Department of Housing and Community Development (HCD) regarding the obligation to construct a total of 1,100 residential units of which 267 are restricted as affordable rate units. Therefore, this alternative may prove not be feasible, because it would require that the covenant be rescinded. Nonetheless, the alternative is included in this analysis because it is the only alternate site within the RSP Area that is of sufficient size to accommodate the Stadium.

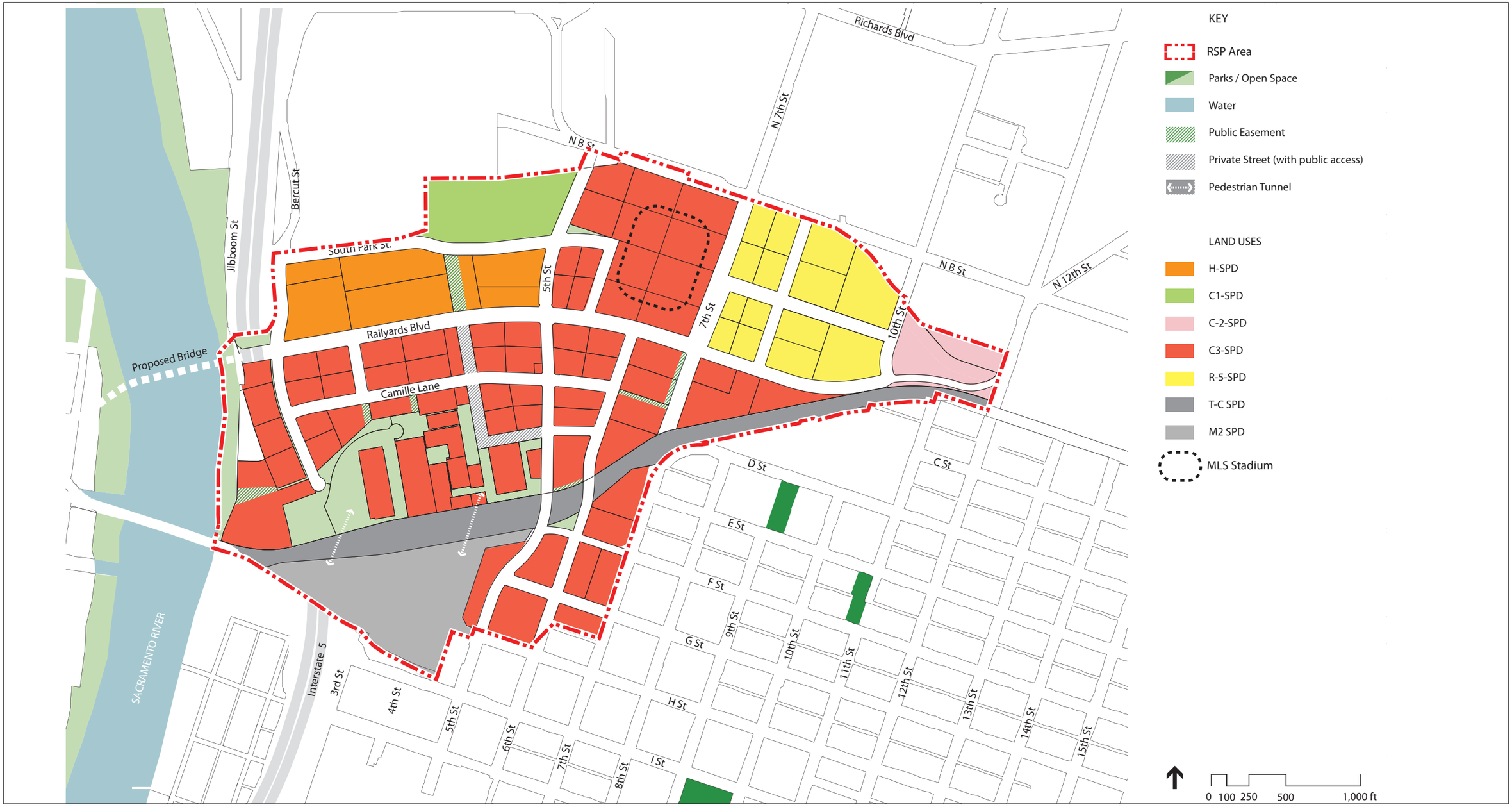
Comparative Analysis of Environmental Effects

Table 6-5 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 8.

Impacts Identified as Being the Same or Similar to the Proposed Project

Many of the impacts of Alternative 8 would essentially identical to the proposed MLS Stadium, because the same area would be disturbed during construction, and the size of the stadium, number of residential units and non-residential square footage would not change. All construction impacts would be the same, because the area to be disturbed and amount of construction would not change. This includes construction emissions (Impacts 4.2-2 and 4.2-8), all biological and cultural resource impacts (Impacts 4.3-2, 4.2-11, 4.4-1, and 4.4-7, 4.4-8 and 4.4-10), the risk of exposure to contaminated soils or groundwater during construction (Impact 4.8-7), and construction-related noise and vibration impacts (Impacts 4.10-1, 4.10-4, 4.10-6 and 4.10-7).

Because the levels of development would be the same, the amount of traffic generated, vehicle miles traveled and energy use would also be the same. Therefore, impacts stemming from increased traffic and energy use would be the same for both Alternative 8 and the proposed MLS Stadium--increased air emissions (Impact 4.2-9) and increased demand for water (Impact 4.13-7).



SOURCE: AECOM, June 6, 2016

Figure 6-2
Alternative 8 MLS Stadium - Natomas Location

Unlike the MLS Stadium, residential and commercial development on the Alternative 7 site could be developed in high-rises with highly reflective surfaces (Impacts 4.1-4 and 4.1-8) and/or the potential to cause hazardous wind conditions for pedestrians (Impact 4.2-7). These impacts would not be new; rather, the impacts would just occur at a different location. Also, these impacts would be reduced to a less-than-significant level by implementing mitigation identified in Chapter 4.

The size of the stadium would not change under Alternative 8, so the number of external trips would be similar to the proposed MLS Stadium. Therefore, impacts on queuing on I-5 (Impacts 4.12-3 and 4.12-10) would be similar. Mitigation would be required to reduce impacts on these facilities, but the impact on I-5 queuing would remain significant and unavoidable.

Because the stadium under Alternative 8 would be the same size, the amount of construction and the resulting potential for conflicts with construction traffic would be the same as the proposed MLS Stadium (Impacts 4.12-7 and 4.12-14). The impact would be significant because a substantial amount of construction would occur, and mitigation requiring a Construction Traffic Management Plan would be needed to reduce this impact to a less-than-significant level.

Impacts Identified as Being Less Severe than the Proposed Project

Alternative 8 would substantially lessen impacts related to the location of the MLS Stadium relative to existing residential and other sources, specifically noise (Impacts 4.10-2, 4.10-3 and 4.10-9) and light (Impact 4.1-3). These impacts would be significant and unavoidable for the MLS Stadium at the proposed location, even with mitigation, due to the site's proximity to existing residences and other sensitive uses to the south and southeast. As discussed on pages 4.1-80 and 4.1-81 of Chapter 4, a canopy would cover the majority of the Stadium seating areas, but it would be open over portions of the field. Field lighting would be located under and alongside the inside edge of the canopy. This lighting would be directed downward, so light could be emitted through the open areas. In addition, illuminated signs and other lighting could include animated, colorful and changing lights, which would be more noticeable to nearby residents than unchanging white light. These lights could be disturbing and/or disruptive to individuals in homes, offices and on residential streets in Alkali Flat or other nearby neighborhoods.

Alternative 8 would relocate the stadium to the east, where it would be bordered on three sides by the RSP Area and to the north by vacant land and industrial and other non-residential uses. The Stadium would be approximately 2 blocks farther from Alkali Flat than the proposed MLS Stadium site. Future uses would include the KP Medical Center to the west, high-density residential, office and retail to the south and high-density residential and retail to the east. The River District Specific Plan calls for high-density multifamily uses to the north of the RSP Area boundary. These uses would be less sensitive to the type of lighting and activity associated with the stadium than the lower-density residential neighborhoods to the west of the

RSP Area. The lower density neighborhoods would still be able to see the lights from the Stadium, but distance and intervening development, such as the residential and retail buildings along 7th Street would reduce its visibility. Therefore, while relocating the Stadium to this location, the lighting impacts would be substantially reduced, although not eliminated.

Under Alternative 8, residential buildings on the site of the proposed MLS Stadium would be in proximity to the railroad tracks, and therefore subject to rail noise and vibration (Impact 4.10-2). However, because the site is 2 acres larger than the area where the R-5 zoning is proposed with the project, there would be enough room to achieve the 190-foot setback required by mitigation, without reducing the number of residential units.

Crowd and amplified noise would be audible at substantial distances from the Stadium. As discussed on pages 4.10-50 through 4.10-53 of Chapter 4, amplified noise could exceed City noise standards at sensitive receptors as far as 3,000 feet from the Stadium during nighttime events, and as far as 2,000 feet during the day. Existing residential areas that could be affected by these noise levels include Alkali Flat, the Creamery, the Dos Rios Housing project, Globe Mills, the Quinn Cottages, and residences on Water Street. KCRA, which records broadcasts at its studios approximately 500 feet from the proposed MLS Stadium site would be subjected to exterior noise levels as high as 85 dBA L_{eq} (interior noises would be lower). Future sensitive uses, such as the residential units within the RSP Area would be subjected to exterior noise levels as high as 90 dBA L_{eq}. Crowd noise would not be as pronounced as amplified noise, but could still exceed City standards up to 800 feet from the Stadium. Mitigation Measure 4.10-3 requires that the outdoor amplified sound system to be designed to minimize noise exposure at offsite residences through measures such as speaker height, orientation and volume control. Even with this mitigation, it is expected that City noise standards would be exceeded at existing and future sensitive receptors. Therefore, the impact would be significant and unavoidable, even with mitigation.

By moving the Stadium to the west, Alternative 8 would put more distance between residential uses to the south and west and the amplified noise and crowd noise from the Stadium. Assuming that the City standards for nighttime noise can be achieved at 3,000 feet from the Stadium, Alternative 8 could have adverse effects on residential neighborhoods west of 12th Street and north of G Street. In contrast, noise levels could exceed nighttime standards as far as 16th Street to east and I Street to the south under the proposed MLS Stadium. Portions of the Dos Rios Housing Project could also be affected under Alternative 8, but to a lesser degree than the proposed MLS Stadium location. This analysis does not take into consideration the residential and commercial buildings that would be located on the portion of the proposed MSL Stadium site, which would block much of the line of site from the Stadium. It should also be noted that the Alternative 8 location is closer to land that is zoned for residential development in the River District Specific Plan, immediately north of the RSP Area. These units, if and when they are developed, could be subject to more noise from the Stadium at the Alternative 8 location. The combination of distance and buildings being constructed between

the stadium and existing residential units would substantially reduce the noise impact from amplification and crowds. However, the impact could remain significant and unavoidable because those residences closest to the RSP Area would still experience noise levels above City standards.

Impacts Identified as Being More Severe than the Proposed Project

The Alternative 8 location is also much closer to the KP Medical Center project site than the proposed MLS Stadium site. Hospitals can be considered sensitive to noise levels (Impacts 4.10-2, 4.10-3 and 4.10-9). Under Alternative 8, buildings would be constructed immediately west of the stadium, so the hospital would be buffered from stadium noise. The KP Medical Center Phase 2 parking structure would also provide some buffering. However, the upper floors of the hospital, which would contain patient rooms, could be more directly exposed to stadium noise, particularly before the buildings west of the stadium are constructed. Mitigation would reduce the noise from these sources to acceptable, less-than-significant levels for both interior and exterior noise for both Alternative 8 and the proposed project.

Alternative 8 would situate the 25,000-capacity MLS Stadium west of 7th Street between Railyards Boulevard and North B Street.

This alternative would generally result in greater impacts on intersections (Impacts 4.12-1 and 4.12-8), pedestrian circulation (Impacts 4.12- 6 and 4.12-13) than the proposed MLS Stadium for several reasons. First, it would eliminate the connection of 6th Street from Railyards Boulevard to North B Street. This would result in the parallel segments of 5th and 7th Streets carrying greater levels of traffic under RSPU Buildout Conditions. Second, it would eliminate the planned easterly extension of South Park Street between 5th Street and 7th Street. This would result in the parallel segments of Railyards Boulevard and North B Street carrying greater levels of traffic under RSPU Buildout Conditions. The following characterizes the trade-offs between the proposed location of the MLS Stadium and new location associated with this alternative:

- Proximity to Transit: Under baseline conditions, the new light rail station would be situated along the east side of 7th Street north of Railyards Boulevard. This location would allow riders to board/alight trains without crossing 7th Street to access the proposed MLS Stadium. In contrast, the relocated stadium site would require that they cross 7th Street to access the stadium.

- North-South Streets Adjacent to Stadium: The proposed MLS Stadium would be situated along 8th and 10th Streets, which are anticipated to serve modest levels of through traffic. In contrast, the relocated site would be situated along 7th Street, which is projected to be heavily traveled. Whereas temporary event-related closures of portions of 8th and 10th Streets can likely be accommodated with little difficulty, closures of 7th Street could pose more significant circulation challenges (particularly with 6th Street no longer extending to North B Street).

- Effects on Roadways to the South: The relocated MLS Stadium would likely attract more travel along 5th Street given that this roadway would provide access (from the south) to parking located west of the relocated site, which could introduce new operational challenges along I and J Streets. In contrast, 6th and 7th Streets may experience slightly less travel, particularly if portions of Railyards Boulevard or 7th Street need to be closed to accommodate large pedestrian volumes.

- Vehicular Access from the East: A significant percentage of arriving MLS Stadium attendees would use 12th Street to access parking located within the RSP Area and the River District. The proposed location would allow traffic to use Richards Boulevard, North B Street, and 7th Street to bypass roadways fronting the stadium to access parking. In contrast, the proposed relocation of the stadium (to west of 7th Street) under Alternative 8 would cause circulation challenges to access stadium parking within the RSP area. However, it may be possible to resolve this by providing a greater proportion of RSP temporary stadium parking east of 7th Street.

- Pedestrian Access: The currently proposed MLS Stadium would draw pedestrians who access the site primarily from the west and north. The railroad tracks to the south and the lack of pedestrian connections (under baseline conditions) to the east limit travel in those directions. In contrast, the relocated stadium site under this alternative would draw pedestrian travel from all directions. By being situated in a more central location within the RSP Area, pedestrian travel would likely be more balanced in each direction. This, in turn, would likely beneficially affect the required size of sidewalks, crosswalks, need for traffic control officers, etc.

In summary, a primary drawback (as compared to the proposed MLS Stadium site) of Alternative 8 is the elimination of portions of 6th Street and South Park Street, which would place greater pressures on the parallel segments of 5th Street, 7th Street, Railyards Boulevard, and North B Street, and their intersections. The elimination of these streets would also remove part of the RSP grid and reduce the 'walkability' of the area. One of the advantages of the relocated MLS Stadium Site Alternative is the likelihood of more balanced pedestrian flows during MLS events, which could reduce the size of needed pedestrian facilities. However, this could be offset by potentially greater operational challenges associated with closing portions of adjacent streets (i.e., Railyards Boulevard and 7th Street) during MLS matches.

Relationship to Project Objectives

Alternative 8 would meet the project objectives related to building a multipurpose stadium and entertainment center that meets MLS industry standards, and that would serve as the long-term home to the Sacramento Republic FC. This alternative could also leverage the stadium to catalyze redevelopment of the RSP Area. Access to the stadium from multiple modes of transportation would also be achieved, although, as discussed above, transit and pedestrian

access would not be as safe or efficient as the proposed MLS Stadium site. Because this site is encumbered by a covenant for affordable housing, it may not achieve the RSPU objective of providing sufficient entitlements and regulatory provisions to support development of an MLS franchise.

Alternative 9: Natomas MLS Stadium

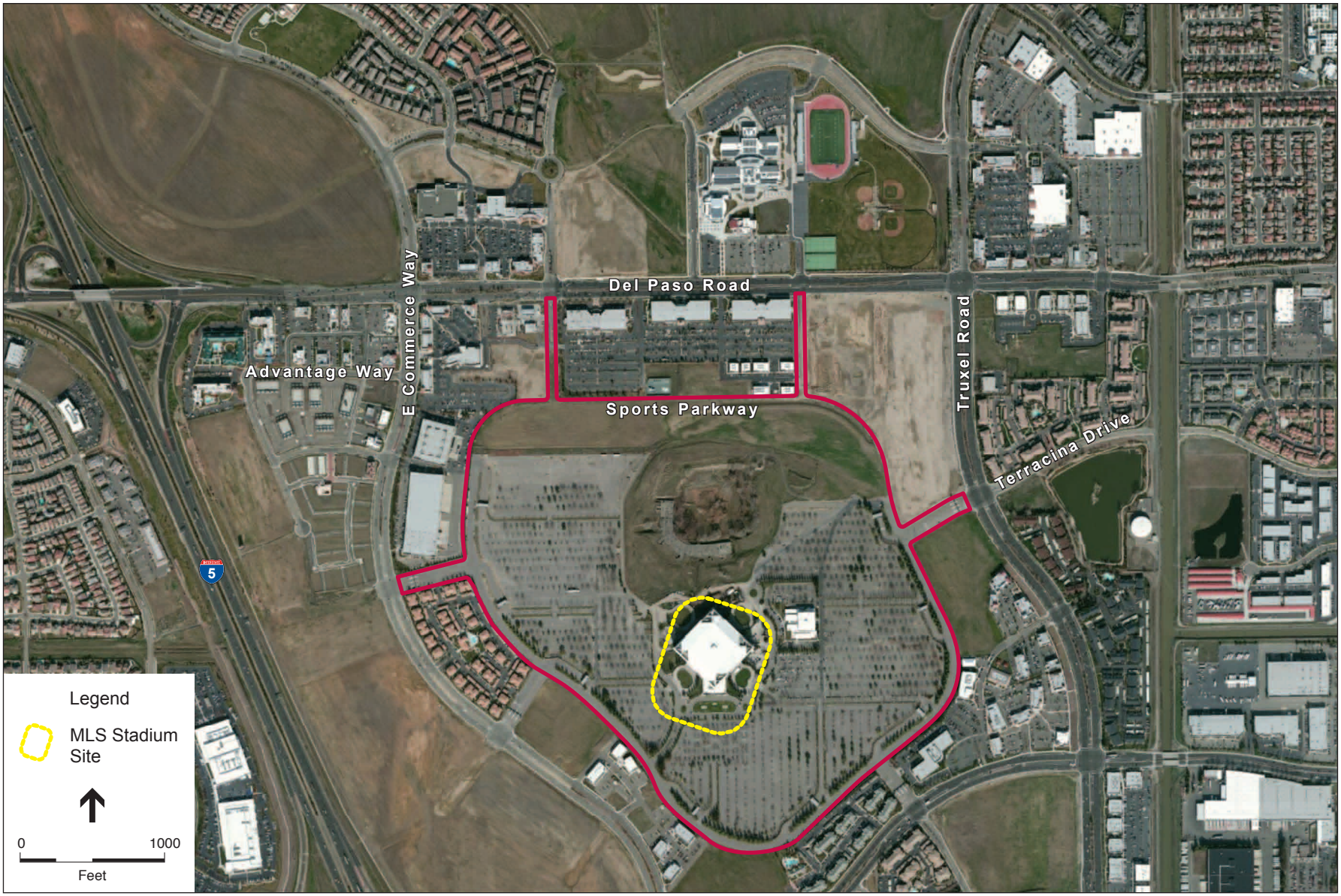
Alternative 9 assumes a 25,000-capacity stadium would be constructed at what is now the Sleep Train Arena complex located south of Del Paso Road, east of I-5, west of Truxel Road and north of Arena Boulevard in North Natomas. The Natomas MLS Stadium would be located within approximately 200 acres of vacant land and existing paved parking lot. A partially constructed and now-abandoned baseball stadium is located in the northern portion of the site. Sleep Train Arena is located in the central portion of the site. The southern portion of the site is dominated by the Sleep Train Arena surface parking lot. The Natomas MLS Stadium site is shown in **Figure 6-3**.

Perimeter access road surrounds the Natomas MLS Stadium Site on the south, west and eastern boundaries. Surrounding land uses include two-story office buildings and parking lots to the north, vacant land to the east, multifamily residential development to the southeast, vacant land and multifamily residential development to the west.

For purposes of this alternative, it is assumed that the existing Sleep Train Arena would be demolished, and replaced by the MLS Stadium with dimensions and design similar to the stadium proposed for the RSP Area (see Figure 6-3). Approximately 14 acres would be used for the stadium, which would include the same amenities as the proposed MLS Stadium. Parking would be provided on site, in the existing parking lot, which has more than 12,000 spaces. The stadium would displace only a small number of these spaces, because it would be located on the same site that the Sleep Train Arena currently occupies.

No new circulation or utilities would be required for the Natomas stadium, because it is already configured to accommodate the basketball arena. Construction activities would be similar to building a stadium in the RSP Area, except that groundwater is less prevalent at the Natomas site, so there would be less dewatering.

Under this alternative it is assumed that the proposed MLS Stadium site within the RSP Area would be developed under either the adopted 2007 RSP (if the 2016 RSPU is not adopted) or the Land Use Variant (if the RSPU is developed), as described in Alternative 6. The impacts of developing residential and commercial uses on the proposed MLS Stadium site are described in Chapter 4 under the Land Use Variant and in Alternative 6, above. Therefore, this analysis focuses on the differences between building a stadium on the proposed site in the RSP Area or at Natomas. A brief discussion is provided at the end of impacts on the RSP Area site.



SOURCE: Microsoft, 2012; ESA, 2013

Sacramento Railyards Specific Plan Update . 150286

Figure 6-3

Alternative 9 – MLS Stadium/Natomas Location

Comparative Analysis of Environmental Effects

Table 6-5 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed project and Alternative 9.

Impacts Identified as Being the Same or Similar to the Proposed Project

The Natomas ESC site is completely paved with the exception of the existing Sleep Train arena. There is no native vegetation within the project site. There are undisturbed areas in the vicinity of the unfinished baseball facility, but this area would not be disturbed by stadium construction. There are also landscaping trees in the parking lot, but these would not be heritage trees, and few would be disturbed by construction, which would occur within the area occupied by the existing Sleep Train Arena. However, if nesting birds were present in the area, they could be disturbed by construction activities. This impact would be less-than-significant with mitigation (Impacts 4.3-2 and 4.3-11).

Because the stadium under Alternative 9 would be the same size, the amount of construction and would be similar to the proposed MLS Stadium (Impacts 4.12-7 and 4.12-14), although the specific streets that would be affected would change due to the relocation. The impact would be significant, and mitigation requiring a Construction Traffic Management Plan would be needed to reduce this impact to a less-than-significant level.

The location of the MLS Stadium would not affect the demand for water or other utilities, which is based on the size of the stadium and number of events, which would be the same whether the stadium is located in the RSP Area or at the Natomas site. Because the Natomas site is located within the City, it would be served by the City for water and sewer conveyance, and by RegionalSan for wastewater treatment. Water, sewer and storm drain lines already connect to the Natomas site. These lines would need to be studied to determine whether they need to be upsized, because the stadium would have more capacity than the Sleep Train Arena. However, such infrastructure improvements would be similar to those within the RSP Area, and would not create significant impacts. The demand for water would contribute to the cumulative increase in water supply (Impact 4.13-7), which would be a significant and unavoidable impact regardless of which site the stadium uses.

Impacts Identified as Being Less Severe than the Proposed Project

The Natomas site is not considered sensitive for cultural resources, and is less likely to contain historic or prehistoric resources than the RSP site. Nonetheless, there is a possibility that unexpected archaeological resources could be discovered during excavation (Impacts 4.4-1 and 4.4-8). Mitigation would reduce the impact to a less-than-significant level under existing conditions, but the contribution to the cumulative loss of cultural resources would be significant if such resources were found. This impact would be less severe than constructing the stadium within the RSP Area, because there is less potential for discovering cultural resources.

The potential exposure to contaminated soils would also be similar, because the RSP Area site would be remediated prior to construction, and there are no known contaminated sites in proximity to the Natomas site.[2] There would be the potential to encounter unanticipated contaminants at either site, but this impact would be less than significant with mitigation. Groundwater under the Natomas site is not known to be contaminated, so construction at that location would not expose workers to contaminated groundwater or interfere with remediation efforts. Therefore, the potential exposure to hazardous materials would be less severe than under at the RSP Area site (Impact 4.8-7).

Construction noise impacts would be reduced under Alternative 9 because the distance to the nearest existing residential area would be approximately 1,000 feet, compared to approximately 550 feet from the RSP Area stadium site (Impacts 4.10-1 and 4.10-7). Due to the distance to residences at the Natomas site, it is likely that construction noise would not be significant unless pile driving took place. Construction trucks would likely pass-by residential receptors, but compliance with the City noise ordinance would ensure that this did not disrupt residents. Mitigation Measure 4.10-1(c) requires the use of "sonic" pile drivers if feasible, which would reduce this impact to a less-than-significant level. However, because the feasibility of "sonic" pile drivers is not known at this time, the impact is considered significant and unavoidable, although less severe than construction of a stadium at the RSP Area site.

There are no historic buildings near the Natomas site, and no occupied buildings close enough to be affected by vibration during project construction (Impacts 4.10-4 and 4.10-7). Therefore, this impact would be less than significant, and Mitigation Measure 4.10-5, which specifies steps to minimize the effects of vibration from construction activities, would not be required for Alternative 9.

The Natomas site does not have the density of residential uses in close proximity that the RSP Area does, so several operational impacts would be less severe. The design of the stadium would be unchanged, so it would be open over portions of the field. Field lighting could be emitted through the open areas. In addition, illuminated signs and other lighting could include animated, colorful and changing lights. There would be no structures surrounding the stadium at the Natomas site, so these lights would be clearly visible to drivers on I-5 and the residences, offices and stores in the surrounding area, which would be a significant and unavoidable impact. Stadium lighting would also be visible from the site in the RSP Area, but that site is located in a more dense and urban environment, with more residences in close proximity to the stadium, although views would be blocked by buildings in some areas. Because there are fewer sensitive receptors (e.g., residences) in proximity to the Natomas site, the impact would be less severe under Alternative 9.

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2 Envirostor, 2013. *California Department of Toxic Substance Control, DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List).* Available: http://www.envirostor.dtsc.ca.gov/public/profile_reort.asp?global_id=34240036. Accessed November 7, 2013.

Amplified noise could exceed City noise standards at sensitive receptors as far as 3,000 feet from the Stadium during nighttime events, and as far as 2,000 feet during the day. The residences located approximately 1,000 feet to the south and east of the Natomas site would therefore be subjected to excessive stadium noise during both daytime and nighttime events (Impacts 4.10-2, 4.10-3 and 4.10-9). At night, apartment buildings and residences as far east as Truxel Road, as far west as I-5 and as far south as Prosper Road could be experience noise levels above City standards. Interior noise levels could be exceeded as well. I-5 noise could mask stadium noise for residences closest to the freeway, but that effect would be diminished at areas farther from the freeway. During the day, higher noise levels are acceptable, and there would be fewer residential areas where City standards could be exceeded. Nonetheless, several apartment complexes are within 2,000 feet of the Natomas stadium site. Mitigation Measure 4.10-3 requires that the outdoor amplified sound system be designed to minimize noise exposure at offsite residences through measures such as speaker height, orientation and volume control. Even with this mitigation, it is expected that City noise standards could be exceeded at existing and future sensitive receptors. Therefore, the impact is considered significant and unavoidable, even with mitigation. Alternative 9 would not result in significant HVAC or loading dock noise, due to the distance to the nearest residences. Because fewer sensitive receptors would be located within the range of potential to noise levels in excess of City standards, the impact would be less severe under Alternative 9.

Impacts related to potential pedestrian access conflicts (Impacts 4.12-6 and 4.12-13) would be less severe under Alternative 9 because there would be fewer people walking to the stadium, and the area is less dense and is not adjacent to a light rail line. Therefore, this impact would be less than significant.

A stadium at the Natomas site would not contribute sewer flows to the City's combined sewer system (Impact 4.13-2), because a separated wastewater and drainage system already exists at the site. Therefore, there would be no impact on the CSS.

Impacts Identified as Being More Severe than the Proposed Project

Impacts stemming from ground disturbance would be similar under Alternative 9 and the proposed MLS Stadium in the RSP Area because the area to be disturbed would be similar, approximately 14 acres. However, additional emissions would result from the demolition of the Sleep Train Arena. Therefore, construction-related air emissions would be greater than constructing the stadium at the RSP Area (Impacts 4.2-2 and 4.2-8).

Operational air emissions would be similar to the RSP Area stadium, because the size of the stadium would not change. However, emissions would be expected to be higher under Alternative 9, because there are fewer opportunities to access the site without an automobile. For the RSP Area site, an estimated 10 percent of trips to and from the stadium would be via transit, bicycle or walking. Only 1 percent of trips to and from the Natomas site would be expected to use these modes. At either site, the increase in operational emission would contribute considerably to the cumulative impact on air quality (Impact 4.2-9), which would

be significant and unavoidable. Because the majority of operational air emissions result from vehicle use, Alternative 9 would be expected to have higher emission levels.

The Natomas site appears to be a mix of basin deposits and the Riverbank Formation. The Riverbank Formation is considered highly sensitive for fossils in Sacramento – the majority of identified paleontological resources in Sacramento County have been discovered within the formation. Important fossils were recovered from excavations in Sacramento County at the Arco Arena in 1989, including remains of ground sloth, dire wolf, horse, rabbit, birds, wood rat, bison, camel, coyote, antelope, deer, and mammoth, as well as clams, fish, turtles, frogs, snakes, and land plant wood, leaves, and seeds.[3] In contrast, the RSP Area stadium site is considered to have low sensitivity for paleontological resources. If the depth of excavation and pile driving exceeds prior excavations, stadium construction at the Natomas site could damage or destroy such resources, if they are present (Impacts 4.4-7 and 4.4-10). Mitigation Measure 4.4-7 would reduce these impacts to a less-than-significant level at either the Natomas site or the RSP Area site by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. For these reasons, impacts on paleontological resources would be similar at both sites.

The Natomas site is in an A99 zone, which is defined as an area protected from a 1 percent chance of flood by a federal flood protection system under construction as of June 16, 2015.[4] This is a Special Flood Hazard Area that is subject to the 100-year flood. Previously, there had been a building moratorium in the Natomas area, but with the new flood zone status, building is now allowed, although subject to certain restrictions.[5] In contrast, the proposed MLS Stadium is in an area with 500-year flood protection and no flood-related restrictions on development. Therefore, the risk of flooding would be greater at the Natomas site (Impacts 4.9-3 and 4.9-6). Under Alternative 9, mitigation may be required to ensure that flood protection at the Natomas site is adequate.

Alternative 9 would have a similar total trip generation to as the proposed MLS Stadium, so it would increase traffic at intersections and on the freeways (Impacts 4.12-1 through 4.12-3 and 4.12-8 through 4.12-10). However, because Alternative 9 would place the 25,000-capacity MLS Stadium at the existing site of Sleeptrain Arena in North Natomas (i.e., located north of I-80 and west of Truxel Road), this alternative would fundamentally change the travel characteristics of the stadium project. Whereas 10 percent of MLS match attendees (according

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3 Sacramento Area Council of Governments, 2011. *Metropolitan Transportation Plan/Sustainable Community Strategies for 2035 Draft Environmental Impact Report*. December 2011. p. 7-23.

4 Federal Emergency Management Agency, 2015. *National Flood Insurance Program, Flood Insurance Rate Map (FIRM) Sacramento County. California and Incorporated Areas, Map Number 06067C0045J,* June 16, 2015.

5 City of Sacramento Department of Utilities, 2016. *Natomas Floodplain Remapping Update.* Available: http://www.cityofsacramento.org/Utilities/Education/Flood-Ready/Maps/Natomas-Remapping, accessed April 24, 2016.

to Table 4.12-25) would walk, bicycle, or take transit to access the proposed MLS Stadium in the RSP Area, less than one percent would be expected to use these modes of travel to access an MLS Stadium in North Natomas. This percentage is based on travel observations conducted at a Sacramento Kings basketball game at the site in 2012. Furthermore, whereas existing Sleeptrain Arena has about 17,300 seats for basketball games, the proposed MLS Stadium would have 25,000 capacity. This represents a 45 percent increase in traffic over what occurs when Kings games were played at Sleeptrain Arena. The Sleeptrain Arena site can be directly accessed by two interchanges on I-5 and one interchange on Interstate 80. Field observations during Kings game reveals heavy traffic flows and queuing that can occasionally spill onto freeways during pre-event conditions. Therefore, Alternative 9 would likely have comparable, if not somewhat worse, levels of congestion and queuing in that area. Mitigation Measure 4.12-1 would be required to reduce these impacts, but the specific improvements that would be needed would differ because the affected intersections, freeway segments and offramps would be different.

Impacts Related to Development of RSP Stadium Site with Residential and Commercial Uses

As discussed above, the preceding analysis focuses on the differences between locating a stadium in the RSP Area versus the Natomas site. However, if the stadium is located at Natomas, it is reasonable to assume that the RSP stadium site would be developed with those uses identified in either the adopted RSP or the proposed RSPU Land Use Variant. The impacts of developing the RSP site with non-stadium uses would be additive to the impacts of constructing the stadium at the Natomas site. Those additional impacts are described below, based on the land use program described for Alternative 6, which assumes no stadium is constructed in the RSP Area or elsewhere.

Those impacts that result from ground disturbance and use of construction activity, such as constructed-related air emissions, exposure to contaminated soils and loss or degradation of biological and cultural resources, would be in addition to the impacts of building the stadium at the Natomas site, so total impacts would be greater than if the MLS Stadium were built at the RSP Area site.[6] Similarly, operational impacts stemming from increased traffic and activity in the RSP Area, such as traffic congestion, operational air emissions, increased light, and demand for water, would be additive. For example, the stadium would have a demand for water of 7 afy. If the stadium is located in the RSP Area, total water demand would be 7 afy. If the stadium is located at the Natomas site, the residential and commercial uses that would be located on the RSP Area site would have a water demand of 101 afy. Therefore, total water demand under Alternative 9 would be 108 afy.

[6] This assumption does not take into account emissions that could occur when the Natomas site is eventually redeveloped, because there are no proposed plans for the site at this time.

There are also impacts that would occur that would be specific to the location of residential and commercial development, as opposed to a stadium, on the RSP Area site. Development of the RSP site with residential uses could bring new residents in proximity to the railroad tracks (Impact 4.10-2) so that they would be exposed to rail noise in excess of City standards for residential uses. The RSP site is large enough to accommodate a 190-foot setback for residential uses, as required by Mitigation Measure 4.10-2, so residential units could be placed far enough from the railroad tracks to meet City standards, which would reduce this impact to a less-than-significant level.

Unlike the MLS Stadium, residential and commercial development could be developed in high-rises with highly reflective surfaces (Impacts 4.1-4 and 4.1-8). This impact would be reduced to a less-than-significant level by limiting the expanse of highly reflective glass.

If residential and/or commercial development on the stadium site were arranged in buildings that exceed 85-feet, they could have the potential to cause hazardous wind conditions for pedestrians (Impact 4.2-7). Mitigation is available to reduce this impact to a less-than-significant level through testing and design.

The residential and commercial development that would be built on the RSP stadium site would have a demand for water of approximately 101 afy in addition to the stadium's demand for water, which would contribute to the cumulative demand for water. This is a significant and unavoidable cumulative impact.

Relationship to Project Objectives

Alternative 9 could achieve the objective of developing a state-of-the-art multipurpose stadium and entertainment facility that meets MLS industry standards, and it could be that the stadium could promote family and civic events compatible with the surrounding area, but would be unable to support and catalyze redevelopment of the RSP Area if it is located in Natomas. However, Alternative 9 would not meet any of the other basic objectives of the MLS Stadium project. The Natomas site would need to be acquired in order to construct a stadium there. Even assuming that the site could be acquired, the process could substantially affect the cost and timing of the project to accommodate MLS expansion efforts. In addition, as discussed above, the Natomas site is not as conducive to travel by bike, foot and/or transit, so it would not promote access by multiple modes of transportation.

Alternative 9 would not support a number of the RSPU project objectives, such as providing a range of complementary uses that includes entertainment, promoting downtown development that is a regional draw for the City, or promoting alternative modes of transportation.

Stormwater Outfall Alternatives

Alternative 10: No Project/Stormwater Outfall

As discussed previously, an EIR must evaluate a "No Project" alternative. In the case of the Stormwater Outfall, under the No Project alternative, the outfall would not be built, and either the RSPU would use a different facility to manage stormwater, such as the cistern that was proposed in the 2007 RSP, or the RSP Area would not develop. Moving the stormwater outfall to a different location along the river would not avoid or lessen any significant impacts.

Comparative Analysis of Environmental Effects

Table 6-8 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the proposed Stormwater Outfall and Alternative 10. As indicated in the table, the impacts of the Stormwater Outfall are confined to construction-related activities, particularly grading and ground disturbance. The Stormwater Outfall construction emissions would exceed the Air District standards for particulate matter (Impacts 4.2-2 and 4.2-9), but mitigation would bring levels below District standards.

There are a number of species and habitats that could be disturbed or destroyed by project construction activities, including nesting habitat (trees) for Swainson's hawk, white-tailed kite and other protected bird species (Impacts 4.3-2 and 4.3-11), removal of riparian habitat (Impacts 4.3-7 and 4.3-16) that could provide roosting habitat for bats (Impacts 4.3-6 and 4.3-15), fill of 0.01 acres of tidal perennial stream (Impacts 4.3-7 and 4.3-16), and removal of two heritage trees (Impact 4.3-9). In addition, pile driving, cofferdam construction and dewatering, as well as other construction activities in the Sacramento River, could degrade disturb fish and degrade their aquatic habitat (Impact 4.3-3 and 4.3-12). The Stormwater Outfall is located over 1,000 feet from the purple martin colony, so it is not expected to disturb that habitat (Impact 4.3-2). All of these impacts could be reduced to a less-than-significant level with mitigation identified in Chapter 4.

Ground disturbance could also damage or destroy cultural resources, such as prehistoric archaeological resources, including human remains (Impacts 4.4-1 and 4.4-8) and paleontological resources (Impacts 4.4-7 and 4.4-10). With the exception of the cumulative impact on archaeological resources, these impacts could be reduced to less-than-significant levels with mitigation.

Grading, excavation and dewatering during Stormwater Outfall construction could result in disturbance or exposure to contaminated soils or groundwater (Impacts 4.8-1, 4.8-3, 4.8-7 and 4.8-8). In addition, construction activities could interfere with ongoing remediation efforts (Impacts 4.8-4 and 4.8-9). None of these impacts would be significant after mitigation.

Impacts Identified as Being the Same or Similar to the Proposed Project

No impacts would be the same as the proposed Stormwater Outfall if no outfall is constructed. However, if a combination of smaller outfall with other infrastructure, such as a cistern, were constructed, and the resulting area of disturbance were similar, the impacts on biological and cultural resources and the increase in air emissions would be similar to the proposed Stormwater Outfall.

Impacts Identified as Being Less Severe than the Proposed Project

If no stormwater outfall is constructed, none of the impacts identified above would occur. However, without a new stormwater outfall, it is unlikely that the RSP Area could be developed beyond existing levels. If a smaller outfall structure were constructed, then the nature of the impacts of outfall construction would be the same, but the severity would be lessened because the footprint and duration of construction would be reduced. For example, the stormwater outfall identified in the 2007 RSP was estimated to be approximately 30 to 35-feet wide, while the 2016 Stormwater Outfall would be approximately 60 feet wide, so the 2007 outfall would disturb less of the riverbank. This reduction in impacts could be offset in part by other infrastructure that would be required, such as the Cistern proposed in the 2007 RSP, as discussed above. The cistern would have been located subgrade, similar to the Stormwater Outfall pumps, and so would have a similar risk of exposing construction workers to contaminated groundwater and/or interfering with groundwater remediation (Impacts 4.8-4, 4.8-7 and 4.8-9).

Impacts Identified as Being More Severe than the Proposed Project

If a combination of outfall and cistern or similar infrastructure were constructed, some stormwater would need to be discharged to the City's combined sewer system (CSS). As discussed in Impact 4.13-2, the City's CSS has limited capacity. In the short-term, projects within the RSPU could rely on the basins to manage stormwater. However, at buildout, stormwater must be discharged either to the river or the CSS. Without the proposed Stormwater Outfall, a portion of the stormwater would need to be discharged to the CSS, which does not now and is not planned to have capacity to accommodate increases in both wastewater and stormwater. Therefore, this would be a new impact of Alternative 10.

Relationship to Project Objectives

The proposed RSPU could not move forward if no outfall were constructed, so none of the project objectives would be achieved. Any storm drainage system for the RSPU would require a connection to the Sacramento River allowing for discharge of stormwater.

6.5 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the State CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

For each significant impact of the RSPU, Table 6-3 indicates whether the impacts of the project alternatives are more or less severe than those of the RSPU. Similarly, Tables 6-4, 6-5 and 6-8 provide a comparison of the impacts of alternatives to the proposed KP Medical Center, MLS Stadium and Stormwater Outfall.

From the alternatives evaluated in this EIR, the environmentally superior alternative would be Alternative 1 – the No Project Alternative. This alternative would avoid all significant impacts associated with the all of the proposed projects.

In accordance with the CEQA Guidelines, if the No Project Alternative is identified as the environmentally superior alternation, an environmentally superior alternative must then be selected from the remaining alternatives. For each of the projects addressed in Chapter 4, an environmentally superior alternative can be identified:

- **RSPU/Land Use Variant: Reduced Density**: For the proposed RSPU, the environmentally superior alternative would be Alternative 3, Reduced Density. Alternative 3 would have a similar footprint to the proposed RSPU, but because the levels of traffic would be reduced, there would be substantial reductions in air emissions, noise, and demand for water. In particular, traffic noise would be reduced to acceptable levels along 7th Street.

- **KP Medical Center**: After a No Build alternative, similar to Alternative 1, Alternative 5 would have a similar footprint to the proposed KP Medical Center, so ground-disturbing activities would be the same. However, with the reduction of 510,000 sf of medical office uses, traffic, noise and demand for water would all be substantially reduced. Therefore, Alternative 5 would be environmentally superior.

- **MLS Stadium**: A No Build alternative, such as Alternative 1, would be environmentally superior. For the build alternatives, the determination of environmentally superior alternative for the MLS Stadium depends on which impacts are weighted most heavily. If the primary concerns are noise and light, then Alternative 9, Natomas Stadium, would be environmentally superior because it would locate the stadium at a greater distance from sensitive users. However, if the primary concerns are air emissions and use of alternative modes of transportation, then Alternative 7 would be

environmentally superior. Alternative 7 would have significant noise and lighting impacts, but they would be lessened due to the reduction in stadium size.

- **Stormwater Outfall**: As discussed previously, the No Build alternative for the Stormwater Outfall would preclude development of the RSP Area, because some form of discharge to the Sacramento River is necessary. The previous option considered in the 2007 RSP was a cistern that would discharge to the CSS combined with a smaller outfall. The smaller outfall would have the same impacts as the proposed Stormwater Outfall, although the magnitude would be reduced because of the smaller size. However, the cistern would discharge to the CSS, which does not have the capacity to accept more than minor stormwater flows. Therefore, the environmentally superior alternative would be the Stormwater Outfall as proposed.

TABLE 6-3.
COMPARISON OF RSPU ALTERNATIVES

Impact	RSPU	Alt 1: No Project/ No Build	Alt 2: No Project/ No Action	Alt 3: Reduced Density
4.1 Aesthetics, Light and Glare				
4.1-1: The implementation of the RSPU, including the potential development of large-floor plate and high-rise buildings in the RSP Area east of I-5, could alter public views.	LTS/MM	NI	LTS	LTS/MM
4.1-2: The potential development of high-rise buildings adjacent to the riverfront could conflict with the character of the riverfront between Old Sacramento and the Jibboom Street Bridge.	LTS/MM	NI	LTS	LTS/MM-
4.1-3: The proposed projects could create substantial new sources of light	SU/MM	NI	LTS/MM	SU/MM-
4.1-4: The proposed projects could create a new source of glare	LTS/MM	NI	LTS/MM	LTS/MM-
4.1-6: The proposed projects could cause an introduction of building height and mass that conflicts with the character of the Sacramento River riverfront between Old Sacramento and Discovery Park	LTS/MM	NI	LTS	LTS/MM-
4.1-8: The proposed projects could contribute to cumulative sources of glare.	LTS/MM	NI	LTS/MM	LTS/MM-
4.2 Air Quality				
4.2-2: Construction of the proposed projects could result in short-term emissions of NOx, PM10 and PM2.5.	LTS/MM	NI	LTS/MM	LTS/MM-
4.2-3: The proposed projects could result in long-term (operational) emissions of NOx, ROG, PM10, or PM2.5.	SU	NI	SU-	SU-
4.2-7: Implementation of the proposed projects could alter wind speed at ground level (pedestrian level).	LTS/MM	NI	LTS/MM	LTS/MM-
4.2-8: The proposed project could contribute to cumulative increases in short-term (construction) emissions.	LTS/MM	NI	LTS/MM	LTS/MM-
4.2-9: The proposed project could contribute to cumulative increases in long-term (operational) emissions of NOx ROG, PM10 and PM2.5.	SU	NI	SU-	SU-
4.3 Biological Resources				
4.3-2: Development of the proposed projects could result in the loss of potential nesting habitat for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	SU/MM	NI	SU/MM	SU/MM
4.3-4: Development of the proposed projects could result in removal of habitat for the Valley Elderberry Longhorn Beetle.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-6: Development of the proposed projects could result in impacts to bat species.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-7: Development of the proposed projects could result in net reduction of sensitive habitats including protected wetland habitat as defined in Section 404 of the Clean Water Act, riparian vegetation, and state jurisdictional waters/wetlands.	LTS/MM	NI	LTS/MM	LTS/MM

TABLE 6-3.
COMPARISON OF RSPU ALTERNATIVES

Impact	RSPU	Alt 1: No Project/ No Build	Alt 2: No Project/ No Action	Alt 3: Reduced Density
4.3-8: Development of the proposed projects could result in isolation or interruption of contiguous habitat which would interfere substantially with the movement of resident or migratory fish or wildlife species, migratory corridors, or impede the use of native wildlife nursery sites.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-9: Development of the proposed projects could conflict with local policies protecting trees.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-11: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative harm to, or loss of nesting habitat, for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	SU/MM	NI	SU/MM	SU/MM
4.3-12: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to cumulative impacts to special-status fish species and degradation of designated critical habitat.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-13: Implementation of the proposed project, in combination with other cumulative development, could/would contribute to the cumulative loss of habitat for the Valley Elderberry Longhorn Beetle.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-15: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative loss of habitat, or impacts to for bat species.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-16: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative loss of sensitive habitats including protected wetland habitat as defined in Section 404 of the Clean Water Act, riparian vegetation, and state jurisdictional waters/wetlands.	LTS/MM	NI	LTS/MM	LTS/MM
4.3-17: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative isolation or interruption of contiguous habitat which would interfere substantially with the movement of resident or migratory fish or wildlife species, migratory corridors, or impede the use of native wildlife nursery sites.	LTS/MM	NI	LTS/MM	LTS/MM
4.4 Cultural Resources				
4.4-1: The proposed projects could cause a substantial adverse change in the significance of an archaeological resource, including human remains.	LTS/MM	NI	LTS/MM	LTS/MM
4.4-2: The proposed projects could cause a substantial adverse change in to the Central Shops Historic District.	LTS/MM	NI	LTS/MM	LTS/MM
4.4-3: The proposed projects could cause a substantial adverse change to the Central Shops Historic District by constructing new buildings and structures surrounding the contributing elements of the district.	LTS/MM	NI	LTS/MM	LTS/MM
4.4-7: Construction of the proposed projects could damage and/or destroy paleontological resources.	LTS/MM	NI	LTS/MM	LTS/MM
4.4-8: The proposed projects could contribute to the cumulative loss or alteration of archaeological resources, including human remains.	SU/MM	NI	SU/MM	SU/MM

TABLE 6-3.
COMPARISON OF RSPU ALTERNATIVES

Impact	RSPU	Alt 1: No Project/ No Build	Alt 2: No Project/ No Action	Alt 3: Reduced Density
4.4-9: The proposed projects could contribute to the cumulative loss or alteration of historic built resources, including the Central Shops Historic District and Southern Pacific Railroad Shops, or the Alkali Flat Historic District.	LTS/MM	NI	LTS/MM	LTS/MM
4.4-10: The proposed projects would contribute to cumulative losses of paleontological resources.	LTS/MM	NI	LTS/MM	LTS/MM
4.5 Energy Demand and Conservation				
4.6 Geology, Soils, and Seismicity				
4.6-2: The proposed projects could result in damage to the historic Central Shops.	LTS/MM	NI	LTS/MM	LTS/MM
4.7 Global Climate Change				
4.8 Hazards and Hazardous Materials				
4.8-1: Construction of the proposed projects could result in the exposure of people to health risk associated with contaminated soils and debris.	LTS/MM	NI	LTS/MM	LTS/MM
4.8-3: Development of the proposed projects could expose people to existing contaminated groundwater during dewatering activities.	LTS/MM	NI	LTS/MM	LTS/MM
4.8-4: Construction of proposed project infrastructure and buildings could interfere with remediation efforts.	LTS/MM	NI	LTS/MM	LTS/MM
4.8-7: Operation of the proposed projects could result in the exposure of people to health risks associated with contaminated soils and groundwater.	LTS/MM	NI	LTS/MM	LTS/MM
4.8-8: The proposed projects in combination with development of other projects in the surrounding area known to contain, or could contain contaminated soil or groundwater, could present a hazard to construction workers if not properly managed.	LTS/MM	NI	LTS/MM	LTS/MM
4.8-9: The proposed projects could contribute to cumulative dewatering activities that could interfere with remediation of the existing South Plume and Lagoon Plume.	LTS/MM	NI	LTS/MM	LTS/MM
4.9 Hydrology and Water Quality				
4.10 Noise and Vibration				
4.10-1: Construction of the proposed projects could generate noise that would conflict with City standards.	SU/MM	NI	SU/MM	SU/MM-
4.10-2: Operations of the proposed projects could result in a substantial permanent increase in ambient exterior noise levels in the project vicinity.	SU/MM	NI	LTS/MM	SU/MM-
4.10-3: The proposed projects could result in residential interior noise levels of 45 dBA Ldn or greater caused by noise level increases due to project operation.	LTS/MM	NI	LTS/MM-	LTS/MM-

TABLE 6-3.
COMPARISON OF RSPU ALTERNATIVES

Impact	RSPU	Alt 1: No Project/ No Build	Alt 2: No Project/ No Action	Alt 3: Reduced Density
4.10-4: Construction of the proposed projects could expose existing and/or planned buildings, and persons within, to vibration that could disturb people and damage buildings.	SU/MM	NI	SU/MM	SU/MM-
4.10-5: The residential, non-residential, and mixed-use buildings constructed pursuant to the RSPU could be exposed to vibration levels due to existing rail operations and/or I-5 traffic.	LTS/MM	NI	LTS/MM	LTS/MM-
4.10-6: The proposed projects would result in exposure of people to cumulative increases in construction noise levels.	LTS/MM	NI	LTS/MM	SU/MM-
4.10-7: The proposed projects would contribute to cumulative construction that could expose existing and/or planned buildings, and persons within, to significant vibration.	SU/MM	NI	SU/MM	SU/MM-
4.10-9: Implementation of the proposed projects would contribute to cumulative increases in residential interior noise levels of 45 dBA Ldn or greater.	LTS/MM	NI	LTS/MM-	LTS/MM-
4.11 Public Services				
4.11-6: The proposed projects could result in a school located in proximity to existing hazards, specifically railroad tracks.	LTS/MM	NI	LTS/MM	LTS/MM
4.11-8: The proposed projects would increase the demand for parks and recreational facilities.	LTS/MM	NI	LTS/MM	LTS/MM-
4.11-9: The proposed projects would contribute to cumulative increases in demand on City parks and recreational facilities.	LTS/MM	NI	LTS/MM	LTS/MM-
4.12 Transportation and Circulation				
4.12-1: The proposed projects could worsen conditions at intersections in the City of Sacramento.	LTS/MM	NI	LTS/MM-	LTS/MM-
4.12-2: The proposed projects could worsen conditions on freeway facilities maintained by Caltrans.	LTS/MM	NI	LTS/MM-	LTS/MM-
4.12-3: The proposed projects could worsen vehicle queuing at off-ramps on I-5.	SU/MM	NI	SU/MM-	SU/MM-
4.12-7: The proposed projects could cause construction-related traffic impacts.	LTS/MM	NI	LTS/MM	LTS/MM-
4.12-8: The proposed projects could contribute to cumulatively unacceptable intersection operations in the City of Sacramento.	LTS/MM	NI	LTS/MM-	LTS/MM-
4.12-9: The proposed project could worsen cumulative conditions on freeway facilities maintained by Caltrans.	LTS/MM	NI	LTS/MM-	LTS/MM-
4.12-10: The proposed project could worsen vehicle queuing at off-ramps on I-5 under cumulative conditions.	SU/MM	NI	SU/MM-	SU/MM-
4.12-14: The proposed projects could cause construction-related traffic impacts under cumulative conditions.	LTS/MM	NI	LTS/MM	LTS/MM-

TABLE 6-3.
COMPARISON OF RSPU ALTERNATIVES

Impact	RSPU	Alt 1: No Project/ No Build	Alt 2: No Project/ No Action	Alt 3: Reduced Density
4.13 Utilities				
4.13-7: The proposed projects would contribute to cumulative increases in demand for water supply and treatment.	SU/MM	NI	SU/MM+	

TABLE 6-4.
COMPARISON OF KP MEDICAL CENTER ALTERNATIVES

Impact	KP Med Center	Alt 4: No Project/No KPMC	Alt 5: Reduced Med Center
4.1 Aesthetics, Light and Glare			
4.2 Air Quality			
4.2-2: Construction of the proposed projects could result in short-term emissions of NOx, PM10 and PM2.5	LTS/MM	LTS/MM	LTS/MM-
4.2-3: The proposed projects could result in long-term (operational) emissions of NOx, ROG, PM10, or PM2.5.	SU	SU	SU-
4.2-7: Implementation of the proposed projects could alter wind speed at ground level (pedestrian level).	LTS/MM	LTS/MM	LTS
4.2-8: The proposed project could contribute to cumulative increases in short-term (construction) emissions.	LTS/MM	LTS/MM	LTS/MM-
4.2-9: The proposed project could contribute to cumulative increases in long-term (operational) emissions of NOx ROG, PM10 and PM2.5.	SU/MM	SU/MM	SU/MM-
4.3 Biological Resources			
4.3-2: Development of the proposed projects could result in the loss of potential nesting habitat for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	LTS/MM	LTS/MM	LTS/MM
4.3-11: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative harm to, or loss of nesting habitat, for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	LTS/MM	LTS/MM	LTS/MM
4.4 Cultural Resources			
4.4-1: The proposed projects could cause a substantial adverse change in the significance of an archaeological resource, including human remains.	LTS/MM	LTS/MM	LTS/MM
4.4-7: Construction of the proposed projects could damage and/or destroy paleontological resources.	LTS/MM	LTS/MM	LTS/MM
4.4-8: The proposed projects could contribute to the cumulative loss or alteration of archaeological resources, including human remains.	SU/MM	SU/MM	SU/MM
4.4-10: The proposed projects would contribute to cumulative losses of paleontological resources.	LTS/MM	LTS/MM	LTS/MM
4.5 Energy Demand and Conservation			
4.6 Geology, Soils, and Seismicity			
4.7 Global Climate Change			
4.8 Hazards and Hazardous Materials			
4.8-7: Operation of the proposed projects could result in the exposure of people to health risks associated with contaminated soils and groundwater.	LTS/MM	LTS/MM	LTS/MM

TABLE 6-4.
COMPARISON OF KP MEDICAL CENTER ALTERNATIVES

Impact	KP Med Center	Alt 4: No Project/No KPMC	Alt 5: Reduced Med Center
4.9 Hydrology and Water Quality			
4.10 Noise and Vibration			
4.10-1: Construction of the proposed projects could generate noise that would conflict with City standards.	SU/MM	SU/MM	SU/MM-
4.10-2: Operations of the proposed projects could result in a substantial permanent increase in ambient exterior noise levels in the project vicinity.	SU/MM	SU/MM	SU/MM-
4.10-4: Construction of the proposed projects could expose existing and/or planned buildings, and persons within, to vibration that could disturb people and damage buildings.	SU/MM	SU/MM	SU/MM-
4.10-6: The proposed projects would result in exposure of people to cumulative increases in construction noise levels.	LTS/MM	LTS/MM	LTS/MM-
4.10-7: The proposed projects would contribute to cumulative construction that could expose existing and/or planned buildings, and persons within, to significant vibration.	SU/MM	SU/MM	SU/MM-
4.11 Public Services			
4.12 Transportation and Circulation			
4.12-1: The proposed projects could worsen conditions at intersections in the City of Sacramento.	LTS/MM	LTS/MM	LTS/MM-
4.12-2: The proposed projects could worsen conditions on freeway facilities maintained by Caltrans.	LTS/MM	LTS/MM	LTS/MM-
4.12-3: The proposed projects could worsen vehicle queuing at off-ramps on I-5.	SU/MM	SU/MM	SU/MM-
4.12-7: The proposed projects could cause construction-related traffic impacts.	LTS/MM	LTS/MM	LTS/MM-
4.12-8: The proposed projects could contribute to cumulatively unacceptable intersection operations in the City of Sacramento.	LTS/MM	LTS/MM	LTS/MM-
4.12-9: The proposed projects could worsen cumulative conditions on freeway facilities maintained by Caltrans.	LTS/MM	LTS/MM	LTS/MM-
4.12-10: The proposed projects could worsen vehicle queuing at off-ramps on I-5 under cumulative conditions.	SU/MM	SU/MM	SU/MM-
4.12-14: The proposed projects could cause construction-related traffic impacts under cumulative conditions.	LTS/MM	LTS/MM	LTS/MM-
4.13 Utilities			
4.13-7: The proposed projects would contribute to cumulative increases in demand for water supply and treatment.	SU/MM	SU/MM+	SU/MM-

TABLE 6-5.
COMPARISON OF MLS STADIUM ALTERNATIVES

Impact	Proposed MLS Stadium	Alt 6: No Project	Alt 7: Smaller Stadium	Alt 8: Relocated Stadium in Railyards	Alt 9: Natomas Stadium
4.1 Aesthetics, Light and Glare					
4.1-3: The proposed projects could create substantial new sources of light	SU/MM	LTS/MM	SU/MM-	SU/MM-	SU/MM-
4.1-4: The proposed projects could create a new source of glare	NI	LTS/MM	NI	LTS/MM	LTS/MM
4.1-8: The proposed projects could contribute to cumulative sources of glare.	NI	LTS/MM	NI	LTS/MM	LTS/MM
4.2 Air Quality					
4.2-1: The proposed projects could conflict with or obstruct implementation of an applicable air quality plan.	LTS/MM	LTS/MM	LTS/MM-	LTS/MM	LTS/MM+
4.2-2: Construction of the proposed projects could result in short-term emissions of NOx, PM10 and PM2.5	LTS/MM	LTS/MM	LTS/MM-	LTS/MM	LTS/MM+
4.2-3: The proposed projects could result in long-term (operational) emissions of NOx, ROG, PM10, or PM2.5.	SU	SU	SU-	SU	SU
4.2-7: Implementation of the proposed projects could alter wind speed at ground level (pedestrian level).	LTS	LTS/MM	LTS	LTS	LTS
4.2-8: The proposed projects could contribute to cumulative increases in short-term (construction) emissions.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM+
4.2-9: The proposed projects could contribute to cumulative increases in long-term (operational) emissions of NOx ROG, PM10 and PM2.5.	SU	SU-	SU-	SU	SU+
4.3 Biological Resources					
4.3-2: Development of the proposed projects could result in the loss of potential nesting habitat for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	SU/MM	SU/MM	SU/MM	SU/MM	LTS/MM
4.3-11: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative harm to, or loss of nesting habitat, for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM
4.4 Cultural Resources					
4.4-1: The proposed projects could cause a substantial adverse change in the significance of an archaeological resource, including human remains.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM-
4.4-7: Construction of the proposed projects could damage and/or destroy paleontological resources.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM+

TABLE 6-5.
COMPARISON OF MLS STADIUM ALTERNATIVES

Impact	Proposed MLS Stadium	Alt 6: No Project	Alt 7: Smaller Stadium	Alt 8: Relocated Stadium in Railyards	Alt 9: Natomas Stadium
4.4-8: The proposed projects could contribute to the cumulative loss or alteration of archaeological resources, including human remains.	SU/MM	SU/MM	SU/MM	SU/MM	SU/MM-
4.4-10: The Proposed projects would contribute to cumulative losses of paleontological resources.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM
4.5 Energy Demand and Conservation					
4.6 Geology, Soils, and Seismicity					
4.7 Global Climate Change					
4.8 Hazards and Hazardous Materials					
4.8-7: Operation of the proposed projects could result in the exposure of people to health risks associated with contaminated soils and groundwater.	LTS/MM	LTS/MM	LTS/MM	LTS/MM	LTS/MM
4.9 Hydrology and Water Quality					
4.10 Noise and Vibration					
4.10-1: Construction of the proposed projects could generate noise that would conflict with City standards.	SU/MM	SU/MM	SU/MM-	SU/MM-	SU/MM-
4.10-2: Operations of the proposed projects could result in a substantial permanent increase in ambient exterior noise levels in the project vicinity.	SU/MM	LTS/MM	SU/MM-	SU/MM-	SU/MM-
4.10-3: The proposed projects could result in residential interior noise levels of 45 dBA Ldn or greater caused by noise level increases due to project operation.	LTS/MM	LTS/MM-	LTS/MM-	LTS/MM-	LTS/MM-
4.10-4: Construction of the proposed projects could expose existing and/or planned buildings, and persons within, to vibration that could disturb people and damage buildings.	SU/MM	SU/MM	SU/MM-	SU/MM-	LTS
4.10-6: The proposed projects would result in exposure of people to cumulative increases in construction noise levels.	LTS/MM	LTS/MM	LTS/MM-	LTS/MM-	LTS/MM
4.10-7: The proposed projects would contribute to cumulative construction that could expose existing and/or planned buildings, and persons within, to significant vibration.	SU/MM	SU/MM	SU/MM-	SU/MM-	SU/MM-
4.10-9: Implementation of the proposed projects would contribute to cumulative increases in residential interior noise levels of 45 dBA Ldn or greater.	LTS/MM	LTS/MM-	LTS/MM-	LTS/MM-	LTS

TABLE 6-5.
COMPARISON OF MLS STADIUM ALTERNATIVES

Impact	Proposed MLS Stadium	Alt 6: No Project	Alt 7: Smaller Stadium	Alt 8: Relocated Stadium in Railyards	Alt 9: Natomas Stadium
4.11 Public Services					
4.12 Transportation and Circulation					
4.12-1: The proposed projects could worsen conditions at intersections in the City of Sacramento.	LTS/MM	LTS/MM+	LTS/MM-	LTS/MM+	LTS/MM+
4.12-2: The proposed projects could worsen conditions on freeway facilities maintained by Caltrans.	LTS	LTS/MM	LTS	LTS	LTS/MM
4.12-3: The proposed projects could worsen vehicle queuing at off-ramps on I-5.	SU/MM	SU/MM	SU/MM-	SU/MM	SU/MM+
4.12-6: The proposed projects could adversely affect existing or planned pedestrian facilities or fail to provide for access for pedestrians.	LTS/MM	LTS	LTS/MM-	LTS/MM+	LTS/MM+
4.12-7: The proposed projects could cause construction-related traffic impacts.	LTS/MM	LTS/MM	LTS/MM-	LTS/MM	LTS/MM
4.12-8: The proposed projects could contribute to cumulatively unacceptable intersection operations in the City of Sacramento.	LTS/MM	LTS/MM+	LTS/MM-	LTS/MM+	LTS/MM+
4.12-9: The proposed project could worsen cumulative conditions on freeway facilities maintained by Caltrans.	LTS	LTS/MM	LTS	LTS	LTS/MM
4.12-10: The proposed projects could worsen vehicle queuing at off-ramps on I-5 under cumulative conditions.	SU/MM	SU/MM+	SU/MM-	SU/MM+	SU/MM+
4.12-13: The proposed projects could adversely affect existing or planned pedestrian facilities or fail to provide for access for pedestrians.	LTS/MM	LTS/MM+	LTS/MM-	LTS/MM+	LTS/MM+
4.12-14: The proposed projects could cause construction-related traffic impacts under cumulative conditions.	LTS/MM	LTS/MM+	LTS/MM-	LTS/MM	LTS/MM
4.13 Utilities					
4.13-7: The Proposed projects would contribute to cumulative increases in demand for water supply and treatment.	SU/MM	SU/MM+	SU/MM-	SU/MM	SU/MM+

TABLE 6-8.
COMPARISON OF STORMWATER OUTFALL ALTERNATIVES

Impact	Stormwater Outfall	Alt 11: No Project	
		No Outfall	No Action
4.1 Aesthetics, Light and Glare			
4.2 Air Quality			
4.2-2: Construction of the proposed projects could result in short-term emissions of NOx, PM10 and PM2.5.	LTS/MM	NI	LTS/MM-
4.2-8: The proposed project could contribute to cumulative increases in short-term (construction) emissions.	LTS/MM	NI	LTS/MM-
4.2-9: The proposed project could contribute to cumulative increases in long-term (operational) emissions of NOx ROG, PM10 and PM2.5.	SU/MM	NI	SU/MM-
4.3 Biological Resources			
4.3-2: Development of the proposed projects could result in the loss of potential nesting habitat for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	SU/MM	NI	SU/MM-
4.3-3: The proposed projects could result in impacts to special-status fish species and degradation of designated critical habitat.	LTS/MM	NI	LTS/MM-
4.3-6: Development of the proposed projects could result in impacts to bat species.	LTS/MM	NI	LTS/MM-
4.3-7: Development of the proposed projects could result in net reduction of sensitive habitats including protected wetland habitat as defined in Section 404 of the Clean Water Act, riparian vegetation, and state jurisdictional waters/wetlands.	LTS/MM	NI	LTS/MM-
4.3-9: Development of the proposed projects could conflict with local policies protecting trees.	LTS/MM	NI	LTS/MM-
4.3-11: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative harm to, or loss of nesting habitat, for Swainson's hawk, white-tailed kite, purple martin, and other sensitive and/or protected bird species.	SU/MM	NI	SU/MM-
4.3-12: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to cumulative impacts to special-status fish species and degradation of designated critical habitat.	LTS/MM	NI	LTS/MM-
4.3-15: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative loss of habitat, or impacts to for bat species.	LTS/MM	NI	LTS/MM-
4.3-16: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative loss of sensitive habitats including protected wetland habitat as defined in Section 404 of the Clean Water Act, riparian vegetation, and state jurisdictional waters/wetlands.	LTS/MM	NI	LTS/MM-
4.3-17: Implementation of the proposed projects, in combination with other cumulative development, could/would contribute to the cumulative isolation or interruption of contiguous habitat which would interfere substantially with the movement of resident or migratory fish or wildlife species, migratory corridors, or impede the use of native wildlife nursery sites.	LTS/MM	NI	LTS/MM-

TABLE 6-8.
COMPARISON OF STORMWATER OUTFALL ALTERNATIVES

Impact	Stormwater Outfall	Alt 11: No Project	
		No Outfall	No Action
4.4 Cultural Resources			
4.4-1: The proposed projects could cause a substantial adverse change in the significance of an archaeological resource, including human remains.	LTS/MM	NI	LTS/MM-
4.4-7: Construction of the proposed projects could damage and/or destroy paleontological resources.	LTS/MM	NI	LTS/MM-
4.4-8: The proposed projects could contribute to the cumulative loss or alteration of archaeological resources, including human remains.	SU/MM	NI	LTS/MM-
4.4-10: The proposed projects would contribute to cumulative losses of paleontological resources.	LTS/MM	NI	LTS/MM-
4.5 Energy Demand and Conservation			
4.6 Geology, Soils, and Seismicity			
4.7 Global Climate Change			
4.8 Hazards and Hazardous Materials			
4.8-1: Construction of the proposed projects could result in the exposure of people to health risk associated with contaminated soils and debris.	LTS/MM	NI	LTS/MM-
4.8-3: Development of the proposed projects could expose people to existing contaminated groundwater during dewatering activities.	LTS/MM	NI	LTS/MM
4.8-4: Construction of proposed project infrastructure and buildings could interfere with remediation efforts.	LTS/MM	NI	LTS/MM
4.8-7: Operation of the proposed projects could result in the exposure of people to health risks associated with contaminated soils and groundwater.	LTS/MM	NI	LTS/MM-
4.8-8: The proposed projects in combination with development of other projects in the surrounding area known to contain, or could contain contaminated soil or groundwater, could present a hazard to construction workers if not properly managed.	LTS/MM	NI	LTS/MM
4.8-9: The proposed projects could contribute to cumulative dewatering activities that could interfere with remediation of the existing South Plume and Lagoon Plume.	LTS/MM	NI	LTS/MM
4.9 Hydrology and Water Quality			
4.10 Noise and Vibration			
4.11 Public Services			
4.12 Transportation and Circulation			
4.13 Utilities			